

## EUROPEAN COMMUNITY COMMENTS

### On the Report of the electronic Working Group on the GSFA PART III colours and appendix III 1, 2 and 3

#### Codex document CX/FA 07/39/9 (Part 2)

#### PART III COLOURS

##### **Recommendation 1 - Food Categories in Which the Use of Colours is Technologically Justified**

The eWG recommends that the CCFA discuss the list of food categories for which the use of colours is justified (Appendix III), with a view toward reaching consensus and using the list as a working document in its future discussion of food additive sweeteners.

The European Community (EC) agrees with the “horizontal approach to be taken with regard to the GSFA provisions for colours. However, The EC is of the opinion that there is a significant number of food categories to which colours are proposed to be used. In some cases the EC questions the need for the use of colours and in some cases the use could mislead the consumer. Therefore in these cases we suggest a more restricted use of food colours. In particular, EC questions the use of colours in basic foods, such as Bread-type products, pasta etc which are widely consumed and therefore could contribute significantly to the intake of colours.

<b>APPENDIX III</b>			
<b>GSFA Categories in which the use of one or more colours is justified</b>			
<b>FCS No.</b>	<b>Title</b>	<b>Justification</b>	<b>European Commission comments</b>
01.1.2	Dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	Include because the CCMP is revising the standard for fermented milk drinks that will likely contain provisions for colors.	Support the recommendation, but excluding chocolate milk. Need for chocolate milk is questioned; This use could mislead the consumer.
01.3.2	Beverage whiteners	Include because there are adopted provisions for colors in these GSFA food categories	Need questioned
01.4.4	Cream analogues		Need questioned
01.5.2	Milk and cream powder analogues		Need questioned
01.6.1	Unripened cheese	Include because CX STANs C-31, A6, 221 and the draft mozzarella standard contain provisions for colors	Need questioned in particular because rind is not expected to be formed in unripened cheese
01.6.2	Ripened cheese		The use of colours in ripened cheese should be limited to a few colours only and for specific types of ripened cheese e.g. INS 121 for red marbled cheese
01.6.2.1	Ripened cheese, includes rind		The use of colours in ripened cheese should be limited to a few colours only and for specific types of ripened cheese e.g. INS 121 for red marbled cheese
01.6.2.2	Rind of ripened cheese		Agree
01.6.2.3	Cheese powder (for reconstitution; e.g., for cheese sauces)	Include because there are adopted provisions for colors in this GSFA food category	Agree
01.6.4	Processed cheese	Include because CX STANs A8a, b & c contains provisions for colors that apply to these food categories	
01.6.4.1	Plain processed cheese		Agree with limited use of colours
01.6.4.2	Flavoured processed cheese,		Agree

### APPENDIX III

#### GSFA Categories in which the use of one or more colours is justified

	including containing fruit, vegetables, meat, etc.		
01.6.5	Cheese analogues		Agree
01.7	Dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	Include because there are provisions for colors adopted for this GSFA food category	Agree
02.1.3	Lard, tallow, fish oil, and other animal fats	Include because CX STAN 19 contains provisions for colors that apply to this food category	Technological need questioned. This use could mislead the consumer.
02.2.1	Emulsions containing at least 80% fat	Add at request of European Commission	Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.2.1.1	Butter and concentrated butter	Include because CX Stan 01 contains provisions for colors that apply to this food category	Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.2.1.2	Margarine and similar products	Include because CX STAN 32 contains provisions for colors and there are adopted provisions for colors in these GSFA food categories	Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.2.1.3	Blends of butter and margarine		Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.2.2	Emulsions containing less than 80% fat		Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.3	Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions		Only limited use to vegetable carotenes (INS 160a <sub>ii</sub> ) of the proposed colours above
02.4	Fat-based desserts excluding dairy-based dessert products of food category 01.7		Agree
03.0	Edible ices, including sherbet and sorbet		Agree
04.1.1.2	Surface-treated fresh fruit	Include with Note 4 <sup>1</sup> and 16 <sup>2</sup>	Technological need questioned. This use could mislead the consumer.
04.1.2.2	Dried fruit	Include because of the following justification: due to the effect of temperature during processing and storage affecting the discoloration of the dried fruit. Dried fruit will lose original natural flesh color in processing and aging	Technological need questioned as well the justification provided. SO <sub>2</sub> is already permitted on dried fruit and can stabilise colours.
04.1.2.3	Fruit in vinegar, oil, or brine	Include because there are adopted provisions for colors in this GSFA food category	Agree
04.1.2.4	Canned or bottled (pasteurized) fruit	Include because CX STANs 60, 61, 61, 78, 99, 159, 242 all contain provisions for colors that apply to this food category	Need questioned. This use could mislead the consumer.
04.1.2.5	Jams, jellies, marmelades	Include because CX STANs 79 and 80 contain provisions for colors and there are adopted provisions for colors in these GSFA food categories	Agree, but only certain colours
04.1.2.6	Fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5		Agree
04.1.2.7	Candied fruit		Agree
04.1.2.8	Fruit preparations, including pulp, purees, fruit toppings and coconut milk		Agree
04.1.2.9	Fruit-based desserts, incl. fruit-flavoured water-based desserts		Agree
04.1.2.10	Fermented fruit products		Agree
04.1.2.11	Fruit fillings for pastries		Agree
04.1.2.12	Cooked fruit		Technological need questioned.
04.2.1.2	Surface-treated fresh vegetables	Include with Note 4 and 16	Question the practical application of this

<sup>1</sup> **Note 4** For decoration, stamping, marking or branding the product.

<sup>2</sup> **Note 16** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

### APPENDIX III

#### GSFA Categories in which the use of one or more colours is justified

	(including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds		on these vegetables. The use should be limited to the coating for vegetables only
04.2.2.2	Dried vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	Include because of the following justification: due to the effect of temperature during processing and storage affecting the discoloration of the dried fruit. Dried fruit will lose original natural flesh color in processing and aging	Only dried potato granules and flakes Question the justification provided, many of these are basic foods, and some are already permitted SO2 on them, which can stabilise the colour.
04.2.2.3	Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soy sauce	Include because CX STANs 55, 58, 81, and 115 contains provisions for colors and here are adopted provisions for colors in these GSFA food categories	Agree, but certain colours only
04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		Agree for processed mushy and garden peas (canned only)
04.2.2.5	Vegetable, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)		Technological need questioned.
04.2.2.6	Vegetable, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5		Agree with the exception of tomato paste and tomato-based sauces (see also codex standard for processed tomato concentrates codex STAN 57-1981)
04.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food category 12.10		Agree
04.2.2.8	Cooked or fried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds		Technological need questioned. The use could mislead the consumer.
05.1.2	Cocoa mixes (syrups)		Technological need questioned. The use could mislead the consumer.
05.1.3	Cocoa-based spreads, incl. fillings	Technological need questioned. The use could mislead the consumer.	
05.1.4	Cocoa and chocolate products	Technological need questioned. The use could mislead the consumer.	
05.1.5	Imitation chocolate, chocolate substitute products	Agree	
05.2	Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3, and 05.4	Agree	
05.2.1	Hard candy	Agree	
05.2.2	Soft candy	Agree	
05.2.3	Nougats and marzipans	Agree	
05.3	Chewing gum	Agree	
05.4	Decorations (e.g., for fine bakery wares), toppings (non-fruit), and sweet sauces	Agree	

### APPENDIX III

#### GSFA Categories in which the use of one or more colours is justified

06.3	Breakfast cereals, including rolled oats		Rolled oats are a basic food. Technological need questioned. Basic food with wide consumption that would increase intake of colours
06.4.3	Pre-cooked pastas and noodles and like products	Include because CX STAN 249 (Instant Noodles) contains color provisions	EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use in instant noodles only, if this is in accordance with CODEX STAN 249-2006
06.5	Cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	Include because there are adopted provisions for colors in these GSFA food categories	Agree
06.6	Batters (e.g., for breading or batters for fish or poultry)		Agree
06.7	Pre-cooked or processed rice products, including rice cakes (Oriental type only)	Include at request of the European Commission	If no other interest, EC does not support
06.8	Soybean products (excluding soybean products of food category 12.9 and fermented soybean products of food category 12.10)		If no other interest, EC does not support
07.1.2	Crackers, excluding sweet crackers	Include because there are adopted provisions for colors in these GSFA food categories	Technological need questioned. Basic food with wide consumption that would increase intake of colours
07.1.4	Bread-type products, including bread stuffing and bread crumbs		Technological need questioned. Basic food with wide consumption that would increase intake of colours
07.2	Fine bakery wares (sweet, salty, savoury) and mixes		Agree
07.2.1	Cakes, cookies and pies (e.g., fruit-filled or custard types)		Agree
07.2.2	Other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)		Agree
07.2.3	Mixes for fine bakery wares (e.g., cakes, pancakes)		Agree
08.1	Fresh meat, poultry and game	Include with Note 4	The use should be limited in glaze, coatings or decorations or surface treatment only
08.1.1	Fresh meat, poultry and game, whole pieces or cuts	Include with Note 4	The use should be limited in glaze, coatings or decorations or surface treatment only
08.1.2	Fresh meat, poultry and game, comminuted	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2	Processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2.1	Non-heat treated processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2.1.1	Cured (including salted) non-heat treated processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2.1.2	Cured (including salted) and dried non-heat treated processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2.1.3	Fermented non-heat treated processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.2.2	Heat-treated processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only

### APPENDIX III

#### GSFA Categories in which the use of one or more colours is justified

08.2.3	Frozen processed meat, poultry, and game products in whole pieces or cuts	Include with Note 16	The use should be limited in glaze, coatings or decorations or surface treatment only
08.3	Processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.1	Non-heat treated processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.1.1	Cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.1.2	Cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.1.3	Fermented non-heat treated processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.2	Heat-treated processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.3.3	Frozen processed comminuted meat, poultry, and game products	Include with Note 16	Agree, but only certain colours
08.4	Edible casings (e.g., sausage casings)	Include with Note 16	Agree, but only certain colours
09.1	Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	Include with Note 16	Technological need questioned for the broad food category of fresh untreated fish. Such use could mislead the consumer. It should therefore be limited as specified in the sub-categories below.
09.1.1	Fresh fish	Include with Note 16	The use should be limited to "fish roe only"
09.1.2	Fresh mollusks, crustaceans and echinoderms	Include with Note 16	Technological need questioned for these products. The use could mislead the consumer.
09.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	Include because there are adopted provisions for colors in this GSFA food category	The use should be limited to certain products only as specified in the subcategories below
09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	Include with Note 95 <sup>3</sup>	Agree
09.2.2	Frozen battered fish, fish fillets and fish products, including mollusks, crustaceans, and echinoderms	Include with Note 16	The use should be limited to batter/coating only and to certain colours only. Codex Standard CX/STAN 166-1989 also provides for limited use of colours
09.2.3	Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	Include with Note X <sup>4</sup>	The use should be limited to "fish roe" and "surimi" only.
09.2.4	Cooked and/or fried fish and fish products, including mollusks, crustaceans, and echinoderms	Include because there are adopted provisions for colors in this GSFA food category	Agree, but for limited use in certain products only
09.2.4.1	Cooked fish and fish products	Include with Note 95	Agree
09.2.4.2	Cooked mollusks, crustaceans, and echinoderms	Include because there are adopted provisions for colors in this GSFA food category	Agree
09.2.4.3	Fried fish and fish products, including mollusks, crustaceans, and echinoderms	Include with Note 16	The use should be limited to "fish roe" and "surimi" only.
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	Include because there are adopted provisions for colors in these GSFA food categories	Agree

<sup>3</sup> **Note 95** For use in surimi and fish roe products only

<sup>4</sup> **Note X** For use in surimi only.

### APPENDIX III

#### GSFA Categories in which the use of one or more colours is justified

09.3	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms		The use should be limited to certain products only (see below)
09.3.1	Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	Include with Note 16	The use should be limited in glaze and coatings.
09.3.2	Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine		The use should be limited in glaze and coatings.
09.3.3	Salmon substitutes, caviar, and other fish roe products	Include because there are adopted provisions for colors in this GSFA food category	Agree
09.3.4	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	Include because there are adopted provisions for colors in this GSFA food category	Agree
09.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	Include with Note 95	Agree
10.1	Fresh eggs	Include with Note 4	Agree
10.2	Egg products	Include because there are adopted provisions for colors in these GSFA food categories	These are basic foods. Technological need questioned.
10.2.1	Liquid egg products		These are basic foods. Technological need questioned.
10.2.2	Frozen egg products		These are basic foods. Technological need questioned.
10.2.3	Dried and/or heat coagulated egg products		These are basic foods. Technological need questioned.
10.3	Preserved eggs, including alkaline, salted, and canned eggs	Include with Note 4 (For decoration stamping, marking or branding the product)	Agree
10.4	Egg-based desserts (e.g., custard)		Agree
11.3	Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	Include because there are adopted provisions for colors in this GSFA food category	Technological need questioned.
11.4	Other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)		Technological need questioned.
12.2.2	Seasonings and condiments	Include because CS STAN 117 contains provisions for colors and there are adopted provisions for colors in this GSFA food category	Agree
12.3	Vinegars		Agree, but certain colours only
12.4	Mustards		Agree
12.5	Soups and broths		Agree
12.5.1	Ready-to-eat soups and broths, including canned, bottled, and frozen		Agree
12.5.2	Mixes for soups and broths		Agree
12.6	Sauces and like products		Agree
12.6.1	Emulsified sauces (e.g., mayonnaise, salad dressing)		Agree
12.6.2	Non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)		Agree
12.6.3	Mixes for sauces and gravies		Agree
12.6.4	Clear sauces (e.g., fish sauce)		Agree
12.7	Salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa-and nut-based spreads of food categories		Agree

APPENDIX III			
GSFA Categories in which the use of one or more colours is justified			
	04.2.2.5 and 05.1.3		
12.9	Protein products	Include upon request of European Commission and New Zealand	If no other interest, EC does not support
12.9.1	Soybean protein products		If no other interest, EC does not support
12.9.1.1	Soybean beverage		If no other interest, EC does not support
12.9.1.2	Soybean milk film		If no other interest, EC does not support
12.9.1.3	Other soybean protein products (including non-fermented soy sauce)		If no other interest, EC does not support
12.9.2	Fresh bean curd (tofu)		If no other interest, EC does not support
12.9.3	Semi-dehydrated bean curd		If no other interest, EC does not support
12.9.3.1	Thick gravy-stewed semi-dehydrated bean curd		If no other interest, EC does not support
12.9.3.2	Deep fried semi-dehydrated bean curd		If no other interest, EC does not support
12.9.3.3	Semi-dehydrated bean curd, other than food categories 12.9.3.1 and 12.9.3.2		If no other interest, EC does not support
12.9.4	Dehydrated bean curd (kori tofu)		If no other interest, EC does not support
12.9.5	Other protein products		If no other interest, EC does not support
12.10	Fermented soybean products		If no other interest, EC does not support
12.10.1	Fermented soybeans (e.g., natto)		If no other interest, EC does not support
12.10.2	Fermented soybean curd (soybean cheese)		If no other interest, EC does not support
12.10.3	Fermented soybean paste (e.g., miso)		If no other interest, EC does not support
12.10.4	Fermented soy sauce	If no other interest, EC does not support	
13.3	Dietetic foods intended for special medical purposes (excluding products of food category 13.1)	Include because there are adopted provisions for colors in this GSFA food category	Agree
13.4	Dietetic formulae for slimming purposes and weight reduction		Agree
13.5	Dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1-13.4 and 13.6		Agree
13.6	Food supplements		Agree
14.1.4	Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks		Agree
14.1.4.1	Carbonated water-based flavoured drinks		Agree
14.1.4.2	Non-carbonated water-based flavoured drinks, including punches and ades		Agree
14.1.4.3	Concentrates (liquid or solid) for water-based flavoured drinks	Agree	
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	Include based on the following justifications. 1) Caramel colour, flavours and caffeine are dried on maltodextrin, which is added to dried coffee, in order to make an extended mix which is used as a coffee substitute in Russia (e.g. by the Russian military). 2) This category includes canned coffees that are served hot. The use of caramel color is technologically justified in such products due to a specific manufacturing method (retort sterilization) that may change the color during processing. Caramel color is added to	Only for coffee substitutes.

<b>APPENDIX III</b>			
<b>GSFA Categories in which the use of one or more colours is justified</b>			
		provide a consistent color of the product that is expected by consumers. Such coffees are widely marketed in Japan.	
14.2.1	Beer and malt beverages	Include because there are adopted provisions for colors in this GSFA food category	Agree, but certain colours only
14.2.2	Cider and perry		Agree, but certain colours only
14.2.3.3	Fortified grape wine, grape liquor wine, and sweet grape wine		The technological need is questioned. The use could mislead the consumer
14.2.4	Wines (other than grape)		Agree
14.2.6	Distilled spirituous beverages containing more than 15% alcohol		Agree
14.2.7	Aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low-alcoholic refreshers)		Agree
15.0	Ready-to-eat savouries		Agree
15.1	Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)		Agree
15.2	Processed nuts, including coated nuts and nut mixtures (with e.g., dried fruit)		Agree
15.3	Snacks - fish based		Agree
16.0	Composite foods - foods that could not be placed in categories 01 - 15		The technological need is questioned. Justification should be provided why the carry over wouldn't be sufficient

**Recommendation 2 - Food Categories in Which the Use of Colors is Technologically Justified**

The eWG recommends that the CCFA establish as a principle that all provisions for the use of colours in GSFA food categories 04.1.1, 04.2.1, 08.1, 09.1 et. seq. should include Notes 4 and 16.

The EC agrees with this recommendation 2. However, the EC considers that the use of colours and food additives in general for marking, stamping, decoration, glazes or coatings should be considered separately for these applications. In this regard, the EC would support consideration of the options for listing food additives in such applications, as suggested in the discussion paper submitted by Canada last year.

## ALLURA RED AC (INS 129)

1. The 25<sup>th</sup> JECFA (1981) assigned an ADI of 7 mg/kg bw/d for allura red AC.

### Recommendation 1 – Allura Red AC, INS 129

The eWG recommends that the 39<sup>th</sup> CCFA **discontinue** further work on the following food additive provisions for allura red AC in the GSFA.

## EC agrees with recommendation 1

### Recommendation 2 - Allura Red AC, INS 129

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for allura red AC in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	EC comments
01.6.2.2	rind of ripened cheese	100	mg/kg		Agree
01.6.4	processed cheese	200	mg/kg		Lower to 100 mg/kg
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	300	mg/kg		Support at 150 mg/kg.
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	<b>300</b>	<b>mg/kg</b>		EC opposes such use could mislead the consumer
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	300	mg/kg		Support at 150 mg/kg. ADI
03.0	edible ices, including sherbet and sorbet	300	mg/kg		Support at 150 mg/kg.
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		
04.1.2.5	jams, jellies and marmelades	300	mg/kg		The Codex standard on jam and jellies contains the use of several colours but no the use of Allure Red AC. Discontinue
04.1.2.7	candied fruit	300	mg/kg		Suggested 200 mg/kg
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	300	mg/kg		
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	300	mg/kg		Suggested 150 mg/kg
04.1.2.11	fruit fillings for pastries	<b>300</b>	<b>mg/kg</b>		Suggested 200 mg/kg
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	<b>300</b>	<b>mg/kg</b>		Technological need questioned discontinue
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	200	mg/kg		The Codex standard on this category contains no use of colours Technological need questioned Discontinue
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg		Support with the exception of tomato paste and tomato-based sauces

<b>Recommendation 2 - Allura Red AC, INS 129</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for allura red AC in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
05.1.3	cocoa-based spreads, including fillings	300	mg/kg		The Codex standard on this category contains no use of colours. Additionally technological need is questioned. This use could mislead the consumer. Discontinue
05.1.4	cocoa and chocolate products	300	mg/kg		The Codex standard on this category contains no use of colours. Additionally technological need is questioned. This use could mislead the consumer. Discontinue
05.1.5	imitation chocolate, chocolate substitute products	300	mg/kg		
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	<b>300</b>	<b>mg/kg</b>		
05.3	chewing gum	<b>300</b>	<b>mg/kg</b>		
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>300</b>	<b>mg/kg</b>		
06.2	flours and starches (including soybean powder)	<b>300</b>	<b>mg/kg</b>		Discontinue Moreover, the use in this category is not compatible with several Codex Standards on flours (e.g. wheat flour, whole maize (corn) meal, pearl millet flour, sorghum flour) which do not contain any use of colours.
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	300	mg/kg		Suggested 150 mg/kg
07.1.2	crackers, excluding sweet crackers	300	mg/kg		Discontinue Basic food with wide consumption which would increase intake
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	300	mg/kg		Discontinue Basic food with wide consumption which would increase intake
07.2.1	cakes, cookies and pies (e.g., fruit-filled or custard types)	<b>300</b>	<b>mg/kg</b>		Suggested 200 mg/kg
07.2.2	other fine bakery products (e.g., doughnuts, sweet rolls, scones, and muffins)	300	mg/kg		Suggested 200 mg/kg
07.2.3	mixes for fine bakery wares (e.g., cakes, pancakes)	300	mg/kg		Suggested 200 mg/kg
08.4	edible casings (e.g., sausage casings)	<b>300</b>	<b>mg/kg</b>	Note 16	
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 95	
09.2.4.1	cooked fish and fish products	<b>300</b>	<b>mg/kg</b>		With Note 95
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 22	
09.3.3	salmon substitutes, caviar, and other fish roe products	<b>300</b>	<b>mg/kg</b>		
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories	<b>300</b>	<b>mg/kg</b>		Suggested 100 mg

<b>Recommendation 2 - Allura Red AC, INS 129</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for allura red AC in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
	09.3.1 - 09.3.3				
10.1	fresh eggs	100	mg/kg	Note 4	
10.4	egg-based desserts (e.g., custard)	300	mg/kg		Suggested 150 mg
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		
12.2.2	seasonings and condiments	<b>300</b>	<b>mg/kg</b>		
12.4	mustards	300	mg/kg		
12.5	soups and broths	300	mg/kg		Suggested 50 mg/kg
12.6	sauces and like products	<b>300</b>	<b>mg/kg</b>		Should not be used in tomato based sauces
12.9.5	other protein products	100	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		
13.6	food supplements	300	mg/kg		
<b>14.1.4</b>	<b>Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks</b>	<b>100</b>	<b>mg/kg</b>	<b>Note 127<sup>5</sup></b>	
14.2.2	cider and perry	200	mg/kg		
14.2.4	wines (other than grape)	200	mg/kg		
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		Suggested 200 mg
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		Suggested 100 mg
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		
16.0	composite foods - foods that could not be placed in categories 01 - 15	<b>300</b>	<b>mg/kg</b>		Discontinue The technological need is questioned. Justification must be provided why the carry over wouldn't be sufficient

<b>Recommendation 3 - Allura Red AC, INS 129</b>					
<b>Comments are requested</b> on the following food additive provisions for allura red AC in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.6.1	unripened cheese	200	mg/kg	Note 3 <sup>b</sup>	Technological need questioned. Rind is not expected to be formed in unripened cheese

<sup>5</sup> **Note 127:** As served to the consumer

<b>Recommendation 3 - Allura Red AC, INS 129</b>					
<b>Comments are requested</b> on the following food additive provisions for allura red AC in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.6.5	cheese analogues	300	mg/kg	Note 3	Suggested 100 mg/kg except when rind is not expected to be formed
08.3.2	heat-treated processed comminuted meat, poultry, and game products	25	mg/kg		Ok for use only in burger meat with a minimum vegetable and/or cereal content of 4 %
14.1.5	<b>Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa</b>	<b>100</b>	<b>mg/kg</b>		Technological need questioned

### BRILLIANT BLUE FCF (INS 133)

<b>Recommendation 1 – Brilliant Blue FCF, INS 133</b>						
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for brilliant blue FCF in the GSFA.						
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>	<b>Comments</b>	<b>EC Comments</b>	<b>Justification provided to eWG</b>	
04.1.1.2	surface-treated fresh fruit	500	mg/kg	Note 16 <sup>7</sup>	EC agrees with recommendation 1	

### EC agrees with recommendation 1

<b>Recommendation 2 - Brilliant Blue FCF, INS 133</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for brilliant blue FCF in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>	<b>Comments</b>	<b>EC Comments</b>	
01.6.5	cheese analogues	<b>100</b>	<b>mg/kg</b>	Note 3	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	<b>100</b>	<b>mg/kg</b>		
04.1.2.7	candied fruit	<b>100</b>	<b>mg/kg</b>		
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	<b>100</b>	<b>mg/kg</b>		
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	<b>100</b>	<b>mg/kg</b>	Agree except for tomato sauce. Add note 92	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	<b>100</b>	<b>mg/kg</b>	Note 92 <sup>8</sup>	
05.1.5	imitation chocolate, chocolate	100	mg/kg		

<sup>6</sup> **Note 3:** Surface treatment.

<sup>7</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>8</sup> **Note 92:** Excluding tomato-based sauces

<b>Recommendation 2 - Brilliant Blue FCF, INS 133</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for brilliant blue FCF in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
	substitute products				
08.0	meat and meat products, including poultry and game	100	mg/kg	Note 4 <sup>9</sup> 16	
09.2.4.1	cooked fish and fish products	100	mg/kg	Note 95 <sup>10</sup> ,	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	100	mg/kg		
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	Note 22 <sup>11</sup>	
12.2.2	seasonings and condiments	100	mg/kg		
12.4	mustards	100	mg/kg		
12.5	soups and broths	50	mg/kg		
12.6	sauces and like products	100	mg/kg		
12.9.5	other protein products	100	mg/kg		

### **CANTHAXANTHIN (INS 161g)**

**The EC considers that the use of Canthaxanthin should be further restricted because of the very low ADI of this substance.**

**The European Scientific Committee on Food has allocated the same ADI to canthaxantin (0.03 mg/kg b.w) as JECFA. The major concern the Committee has on the use of canthaxantin is the formation of retinal crystalline deposit (Report of the Scientific Committee for Food. 43rd series). Due to this safety concern, the only permitted use in the EC is in *traditional French sausage (Saucisse de Strasbourg)* and therefore the European Community supports discontinuation of the work on all specific provisions.**

### **CARAMEL COLOUR, CLASS III (INS 150c)**

2. The 29<sup>th</sup> JECFA (1985) assigned an ADI of 200 mg/kg bw/d for caramel colour class III.

<b>Recommendation 1 – Caramel Colour Class III, INS 150c</b> The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for caramel colour class III in the GSFA.
---

### **The European community agrees with recommendation 1.**

<b>Recommendation 2 - Caramel Colour Class III, INS 150c</b> The eWG recommends that the 39 <sup>th</sup> CCFA <b>revoke</b> the following adopted food additive provisions for caramel colour class III in the GSFA.
--

### **The European community agrees with recommendation 2.**

<sup>9</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>10</sup> **Note 95:** For use in surimi and fish roe products only

<sup>11</sup> **Note 22:** For use in smoked fish products only.

**Recommendation 3 - Caramel Colour Class III, INS 150c**

The eWG recommends that the 39<sup>th</sup> CCFA adopt the following food additive provisions for caramel colour class III in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg	Note 52 <sup>12</sup>	The maximum level seems to be high for a drink. (a child of 20 kg b.w. would reach the ADI of 200 mg/kg b.w. consuming 100 ml of the product).
01.3.2	beverage whiteners	1000	mg/kg		EC does not support. Need questioned
01.4.3	clotted cream (plain)	5000	mg/kg		
01.5.2	milk and cream powder analogues	5000	mg/kg		EC does not support
01.6.1	unripened cheese	50000	mg/kg		Need questioned rind is not expected to be formed in unripened cheese.
01.6.2	ripened cheese	50000	mg/kg		
01.6.4	processed cheese	50000	mg/kg		
01.6.5	cheese analogues	50000	mg/kg		
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		The maximum level seems to be high. (a child of 20 kg b.w. would reach the ADI of 200 mg/kg b.w. consuming 100 g of the product)
01.8.1	whey and whey products, excluding whey cheeses	50000	mg/kg		The maximum level seems to be high. (a child of 20 kg b.w. would reach the ADI of 200 mg/kg b.w. consuming 100 g of the product) Moreover, the technological need is questioned.
02.1.2	vegetable oils and fats	20000	mg/kg		EC doesn't agree with this provision because CX STAN 19 prohibits the use of colors in vegetable oils.
02.1.3	lard, tallow, fish oil, and other animal fats	20000	mg/kg		EC does not support. The use could mislead the consumer.
02.2.1	blends of butter and margarine	20000	mg/kg		EC does not support
02.2.2	emulsions containing less than 80% fat	<b>500</b>	<b>mg/kg</b>		EC does not support
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	20000	mg/kg		EC does not support
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		
04.1.2	processed fruit	<b>50,000</b>	<b>mg/kg</b>		EC doesn't agree because some subcategories (as 4.1.2.1) are not expected to contain colours. Moreover, the maximal level seems to be too high in this large category.
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	<b>50,000</b>	<b>mg/kg</b>		EC doesn't agree because some subcategories (4.2.2.1) are not expected to contain colours. Moreover, the maximal level seems to be too high in this large category.
05.1.5	imitation chocolate, chocolate substitute products	<b>50,000</b>	<b>mg/kg</b>		

<sup>12</sup> **Note 52:** Excluding chocolate milk

**Recommendation 3 - Caramel Colour Class III, INS 150c**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for caramel colour class III in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
06.3	breakfast cereals, including rolled oats	50000	mg/kg	<b>Note AA</b> <sup>13</sup>	The maximal level is high
06.4.2	dried pastas and noodles and like products	50000	mg/kg		EC doesn't agree because there is no technological need in pastas. A note excluding pastas is required.
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use in instant noodles only, if this is in accordance with CODEX STAN 249-2006
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000	mg/kg		
06.6	batters (e.g., for breading or batters for fish or poultry)	50000	mg/kg		
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000	mg/kg		
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		EC disagrees. This is a basic foodstuff with wide consumption that would increase intake. The use could mislead the consumer.
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		EC disagrees. This is a basic foodstuff with wide consumption that would increase intake. The use could mislead the consumer.
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		EC disagrees. This is a basic foodstuff with wide consumption that would increase intake. The use could mislead the consumer.
07.1.5	steamed breads and buns	50000	mg/kg		EC doesn't agree with this provision.
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		EC doesn't agree with this provision and a note excluding the mixes for breads of the category 7.1.1 is required.
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000	mg/kg		
08.0	meat and meat products, including poultry and game		GMP	<b>Note 3</b> <sup>14</sup> <b>Note 4</b> <sup>15</sup> <b>16</b> <sup>16</sup>	
09.1	fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	<b>Note 4</b> &16	
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		EC wants to add note 95.
09.4	fully preserved,	30000	mg/kg	<b>Note 95</b> <sup>17</sup>	

<sup>13</sup> **Note AA:** Excluding rolled oats.

<sup>14</sup> **Note 3:** Surface treatment.

<sup>15</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>16</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

**Recommendation 3 - Caramel Colour Class III, INS 150c**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for caramel colour class III in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
	including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms				
10.1	fresh eggs	20000	mg/kg	Note 4 <sup>18</sup>	
10.2	egg products	20000	mg/kg		EC doesn't agree the use could mislead the consumer. Egg soups would be covered by category 12.5
10.3	dried and/or heat coagulated egg products	20000	mg/kg		EC wants to add note 4.
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		EC doesn't agree
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		The technological need is questioned.
<b>12.2.2</b>	<b>seasonings and condiments</b>	<b>50000</b>	<b>mg/kg</b>		
12.3	vinegars	10000 0	mg/kg		
12.4	mustards	10000 0	mg/kg		
12.5	soups and broths	10000 0	mg/kg		
12.6	sauces and like products	10000 0	mg/kg		
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	10000 0	mg/kg		
12.9.1	soybean protein products	10000 0	mg/kg		
12.9.3	semi-dehydrated bean curd	80000	mg/kg		
12.9.5	other protein products	10000 0	mg/kg		
12.10	fermented soybean products	10000 0	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		
13.5	dietetic foods (e.g., supplementary foods for	20000	mg/kg		

<sup>17</sup> **Note 95** For use in surimi and fish roe products only.

<sup>18</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<b>Recommendation 3 - Caramel Colour Class III, INS 150c</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for caramel colour class III in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
	dietary use) excluding products of food categories 13.1 - 13.4 and 13.6				
13.6	food supplements	20000	mg/kg		
14.1.3.2	vegetable nectar	50000	mg/kg		EC considers that these products are very similar to fruit nectars and doesn't support this provision.
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg	Note 127 <sup>19</sup>	EC considers that these products are very similar to fruit nectars and doesn't support this provision.
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		The maximal level seems to be high for a drink. (A child of 20 kg b.w. would reach the ADI consuming 100 ml of the product).
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	10000	mg/kg		Technological need in coffee, tea and herbal infusion is questioned Moreover, technological need of this maximum level in the other products is also questioned..
14.2.2	<b>cider and perry</b>	<b>1000</b>	<b>mg/kg</b>		
14.2.4	<b>wines (other than grape)</b>	<b>1000</b>	<b>mg/kg</b>		
14.2.5	mead	<b>1000</b>	<b>mg/kg</b>		
15.0	ready-to-eat savouries	10000	mg/kg		

<b>Recommendation 4 - Caramel Colour Class III, INS 150c</b>					
<b>Comments are requested</b> on the following food additive provisions for caramel colour class III in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>Step</b>
01.4.4	cream analogues	5000	mg/kg		3
05.1.2	cocoa mixes (syrups)		GMP		6
05.1.4	cocoa and chocolate products		GMP		
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		3

**[EC supports Recommendation 4 to request more info on technological need.](#)**

<sup>19</sup> **Note 127:** As served to the consumer.

### CARAMEL COLOUR, CLASS IV (INS 150d)

3. The 29<sup>th</sup> JECFA (1985) assigned an ADI of 200 mg/kg bw/d for caramel colour class IV.

#### Recommendation 1 – Caramel Colour Class IV, INS 150d

The eWG recommends that the 39<sup>th</sup> CCFA **discontinue** further work on the following food additive provisions for caramel colour class IV in the GSFA.

### The European community agrees with Recommendation 1.

#### Recommendation 2 - Caramel Colour Class IV, INS 150d

The eWG recommends that the 39<sup>th</sup> CCFA **revoke** the following adopted food additive provisions for caramel colour class IV in the GSFA.

### The European community agrees with Recommendation 2.

#### Recommendation 3 - Caramel Colour Class IV, INS 150d

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for caramel colour class IV in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	EC Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50000	mg/kg	Note 52 <sup>20</sup>	The maximal level seems to be high for a drink. (A child of 20 kg b.w. would reach the ADI consuming 100 ml of the product).
01.3.2	beverage whiteners	1000	mg/kg		EC does not support. Need questioned
01.4.4	cream analogues	5000	mg/kg		EC does not support
01.5.2	milk and cream powder analogues	5000	mg/kg		EC does not support
01.6.1	unripened cheese	50000	mg/kg		Need questioned rind is not expected to be formed in unripened cheese.
01.6.2	ripened cheese	50000	mg/kg		
01.6.4	processed cheese	50000	mg/kg		
01.6.5	cheese analogues	50000	mg/kg		
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50000	mg/kg		The maximal level seems to be high for a drink. (A child of 20 kg b.w. would reach the ADI consuming 100 g of the product).
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	20000	mg/kg		
03.0	edible ices, including sherbet and sorbet	30000	mg/kg		
04.2.2	processed vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	50,000	mg/kg	Note 92 <sup>21</sup>	EC doesn't agree because some subcategories (4.2.2.1) are not expected to contain colours. Moreover, the maximal level is high for this large category.
05.1.5	imitation chocolate, chocolate substitute products	50,000	mg/kg		The maximal level is high.
06.3	breakfast cereals,	50000	mg/kg	Note AA <sup>22</sup>	

<sup>20</sup> Note 52: Excluding chocolate milk

<sup>21</sup> Note 92: Excluding tomato-based sauces

**Recommendation 3 - Caramel Colour Class IV, INS 150d**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for caramel colour class IV in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
	including rolled oats				
06.4.3	pre-cooked pastas and noodles and like products	50000	mg/kg		<a href="#">EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use in instant noodles only, if this is in accordance with CODEX STAN 249-2006</a>
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	50000	mg/kg		
06.6	batters (e.g., for breading or batters for fish or poultry)	50000	mg/kg		
06.7	pre-cooked or processed rice products, including rice cakes (Oriental type only)	50000	mg/kg		
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	50000	mg/kg		<a href="#">EC disagrees, staple food with high consumption.</a>
07.1.6	mixes for breads and ordinary bakery wares	50000	mg/kg		<a href="#">Ec doesn't agree with this provision and a note excluding the mixes for breads of the category 7.1.1 is required.</a>
07.2	fine bakery wares (sweet, salty, savoury) and mixes	50000	mg/kg		
08.0	meat and meat products, including poultry and game		GMP	<b>Notes 3<sup>23</sup> 4<sup>24</sup> &amp; 16<sup>25</sup></b>	
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	<b>Note 95<sup>26</sup></b>	
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg	<b>Note 95</b>	
10.1	fresh eggs	20000	mg/kg	Note 4 <sup>27</sup>	
10.4	egg-based desserts (e.g., custard)	20000	mg/kg		
<b>12.2.2</b>	<b>seasonings and condiments</b>	<b>10000</b>	<b>mg/kg</b>		
12.3	vinegars	10000	mg/kg		
12.4	mustards	10000	mg/kg		
12.5	soups and broths	10000	mg/kg		<a href="#">Proposed level is high. A 60kg person would reach the ADI with 120 g of soup.</a>

<sup>22</sup> **Note AA:** Excluding rolled oats.

<sup>23</sup> **Note 3:** Surface treatment.

<sup>24</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>25</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>26</sup> **Note 95:** For use in surimi and fish roe products only.

<sup>27</sup> **Note 4:** For decoration, stamping, marking or branding the product.

**Recommendation 3 - Caramel Colour Class IV, INS 150d**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for caramel colour class IV in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
12.6	sauces and like products	10000 0	mg/kg		
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	10000 0	mg/kg		
12.9.1	soybean protein products	10000 0	mg/kg		
12.9.3	semi-dehydrated bean curd	80000	mg/kg		
12.9.5	other protein products	10000 0	mg/kg		
12.10	fermented soybean products	10000 0	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	20000	mg/kg		
13.4	dietetic formulae for slimming purposes and weight reduction	20000	mg/kg		
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	20000	mg/kg		
13.6	food supplements	20000	mg/kg		
14.1.4	water-based flavoured drinks, including "sport," "energy" or "electrolyte" drinks and particulated drinks	50000	mg/kg		The maximal level seems to be high for a drink. (A child of 20 kg b.w. would reach the ADI consuming 100 ml of the product).
<b>14.2.2</b>	<b>cider and perry</b>	<b>1000</b>	<b>mg/kg</b>		
<b>14.2.4</b>	<b>wines (other than grape)</b>	<b>1000</b>	<b>mg/kg</b>		
<b>14.2.5</b>	<b>mead</b>	<b>1000</b>	<b>mg/kg</b>		
15.0	ready-to-eat savouries	10,00 0	mg/kg		
16.0	composite foods - foods that could not be placed in categories 01 - 15	20000	mg/kg		EC opposes. Foodstuffs should be always clearly defined.

**Recommendation 4 - Caramel Colour Class IV, INS 150c**

**Comments are requested** on the following food additive provisions for caramel colour class IV in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>Step</b>
04.1.2	processed fruit	80000	mg/kg		3

<b>Recommendation 4 - Caramel Colour Class IV, INS 150c</b>					
<b>Comments are requested</b> on the following food additive provisions for caramel colour class IV in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>Step</b>
05.1.2	cocoa mixes (syrups)		GMP		6
05.1.3	cocoa-based spreads, including fillings		GMP		adopted
05.1.4	cocoa and chocolate products		GMP		6
06.4.2	dried pastas and noodles and like products	50000	mg/kg		3
07.1.2	crackers, excluding sweet crackers	50000	mg/kg		3
07.1.4	bread-type products, including bread stuffing and bread crumbs	50000	mg/kg		3
07.1.5	steamed breads and buns	50000	mg/kg		3
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30000	mg/kg		3
10.2	egg products	20000	mg/kg		3
10.3	dried and/or heat coagulated egg products	20000	mg/kg		3
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	50000	mg/kg		3
11.6	table-top sweeteners, including those containing high-intensity sweeteners	50000	mg/kg		3
14.1.2.2	vegetable juice	50000	mg/kg		3
14.1.2.4	concentrates for vegetable juice	50000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.2	vegetable nectar	50000	mg/kg		3
14.1.3.4	concentrates for vegetable nectar	50000	mg/kg	Justification of technological need is requested. Use could mislead consumers	3
14.1.5	coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	100000	mg/kg		3

**[EC supports Recommendation 4 for request of additional information.](#)**

## CARMINES (INS 120)

4. The 28<sup>th</sup> CAC has adopted several provisions in the GSFA for the use of carmines.

5. At the 55<sup>th</sup> meeting of the JECFA, (2000), the 1982 ADI of 0-5 mg/kg bw/d for carmines, as ammonium carmine or the equivalent of calcium, potassium and sodium salts was maintained.

<b>Recommendation 1 – Carmines, INS 120</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for carmines in the GSFA.					
Food Cat No.	Food Category	Max Level	Comments	EC Comments	Justification provided to eWG

### EC agrees with recommendation 1

<b>Recommendation 2 - Carmines, INS 120</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for carmines in the GSFA.					
Food Cat No.	Food Category	Max Level	Comments	EC Comments	
01.6.5	cheese analogues	100 mg/kg	Note 3 <sup>28</sup> , & BB <sup>29</sup>	EC agrees	
02.2.1.3	blends of butter and margarine	500 mg/kg	Note BB	EC doesn't agree	
02.2.2	emulsions containing less than 80% fat	500 mg/kg	Note BB	EC doesn't agree	
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	500 mg/kg	Note BB	EC doesn't agree	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	500 mg/kg	Note BB	EC doesn't agree	
05.3	chewing gum	500 mg/kg	Note BB	Support at a level of 300 mg/kg	
06.4.2	dried pastas and noodles and like products	100 mg/kg		The technological need is questioned. Dried pasta is a basic food and this use could mislead the consumer	
06.4.3	pre-cooked pastas and noodles and like products	100 mg/kg		EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use <u>in instant noodles only</u> , if this is in accordance with CODEX STAN 249-2006	
07.1	bread and ordinary bakery wares	500 mg/kg		Use in bread could mislead the consumer. Basic foods, such as bread, with wide consumption could increase significantly the intake of this colour	
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	100 mg/kg	Note 85 <sup>30</sup> -Note 95 <sup>31</sup>		
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500 mg/kg	Note 16 <sup>32</sup> & 95		
09.2.4.3	fried fish and fish products, including mollusks,	500 mg/kg	Note 16 & 95		

<sup>28</sup> Note 3: Surface treatment.

<sup>29</sup> Note BB: Expressed as carminic acid.

<sup>30</sup> Note 85: Excluding use in surimi and fish roe products at 500 mg/kg.

<sup>31</sup> Note 95: For use in surimi and fish roe products only.

<sup>32</sup> Note 16: For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<b>Recommendation 2 - Carmines, INS 120</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for carmines in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC Comments</b>
	crustaceans, and echinoderms				
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	<b>100</b>	<b>mg/kg</b>	<b>Note BB</b>	
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg	<b>Note BB</b>	Use in beer may mislead the consumer.

### CAROTENES, VEGETABLE (INS 160aii)

6. The 28<sup>th</sup> CAC has adopted several provisions in the GSFA for the use of vegetable carotenes.

7. The 41<sup>st</sup> JECFA (1993) determined vegetable carotenes to be acceptable for use as a colour, provided the level of use does not exceed the level normally found in vegetables.

<b>Recommendation 1 – Carotenes, Vegetable, INS 160aii</b>
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for vegetable carotenes in the GSFA.

### EC agrees with recommendation 1

<b>Recommendation 2 - Carotenes, Vegetable, INS 160aii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>revoke</b> the following adopted food additive provisions for vegetable carotenes in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>Justification provided to eWG</b>
02.2.1.2	margarine and similar products	25	mg/kg		See recommendation 3

### EC agrees with recommendation 2

<b>Recommendation 3 - Carotenes, Vegetable, INS 160aii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for vegetable carotenes in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
02.2.1.2	margarine and similar products	<b>30</b>	<b>mg/kg</b>	<b>Note CC<sup>33</sup></b>	
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg	<b>Note CC</b>	
04.1.2.11	fruit fillings for pastries	100	mg/kg	<b>Note CC</b>	
05.1.3	cocoa-based spreads, including fillings	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	The Codex standard on this category contains no use of colours. Additionally technological need is questioned. This use could mislead the consumer. Discontinue
05.1.4	cocoa and chocolate products	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	The Codex standard on this category contains no use of colours. Additionally technological need is questioned. This use could mislead the consumer. Discontinue

<sup>33</sup> **Note CC:** Expressed as beta-carotene.

<b>Recommendation 3 - Carotenes, Vegetable, INS 160ai</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for vegetable carotenes in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
06.4.3	pre-cooked pastas and noodles and like products	1000	mg/kg		EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use <u>in instant noodles only</u> , if this is in accordance with CODEX STAN 249-2006
09.1.1	fresh fish	<b>100</b>	<b>mg/kg</b>	Note 4 <sup>34</sup> , 16 <sup>35</sup> , 50 <sup>36</sup> <b>Note CC</b>	
09.2.4.1	cooked fish and fish products	1000	mg/kg	<b>Note 95</b>	
12.2.2	seasoning and condiments	500	mg/kg		
12.10.3	fermented soybean paste (e.g., miso)	<b>1000</b>	<b>mg/kg</b>		
14.1.2.2	vegetable juice	2000	mg/kg		Discontinue Technological need is questioned. This use could mislead the consumer.
14.1.2.4	concentrates for vegetable juice	2000	mg/kg	<b>Note 127<sup>37</sup></b>	Discontinue Technological need is questioned. This use could mislead the consumer.
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	20000	mg/kg		
16.0	composite foods - foods that could not be placed in categories 01 - 15	1000	mg/kg		Discontinue The technological need is questioned. Justification should be provided why the carry over wouldn't be sufficient. In addition foodstuffs should be clearly described.

<b>Recommendation 4 – Carotenes, Vegetable, INS 160ai</b>					
<b>Comments are requested</b> on the following food additive provisions for carotenes in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
<b>01.4.4</b>	<b>Cream analogues</b>	<b>20</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	200	mg/kg		Technological need questioned only dried potato granules and flakes
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	1320	mg/kg		In line with EC
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and	200	mg/kg		Technological need questioned The Codex standard on this category contains no use of colours processed mushy and garden peas only

<sup>34</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>35</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>36</sup> **Note 50:** For use in fish roe only.

<sup>37</sup> **Note 127:** As served to the consumer

<b>Recommendation 4 – Carotenes, Vegetable, INS 160aii</b>					
<b>Comments are requested</b> on the following food additive provisions for carotenes in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	legumes, and aloe vera), and seaweeds				
05.1.2	Cocoa mixes (syrups)	100	mg/kg	<b>Note CC</b>	Technological need is questioned. This use could mislead the consumer.
05.1.5	Imitation chocolate, chocolate substitute products	100	mg/kg	<b>Note CC</b>	The EC could support this provision.
06.4.2	dried pastas and noodles and like products	1000	mg/kg		Technological need is questioned. This is a basic food with wide consumption.
07.1.6	mixes for breads and ordinary bakery wares	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need is questioned. This is a basic food with wide consumption
08.1.2	fresh meat, poultry, and game, comminuted	20	mg/kg	Note 4 <sup>38</sup> , 16 <sup>39</sup> & 117 <sup>40</sup>	
<b>11.3</b>	<b>Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3</b>	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	<b>Doesn't support. Use could mislead the consumer</b>
14.1.3.2	vegetable nectar	2000	mg/kg		Justification of technological need is requested. Use could mislead consumers
14.1.3.4	concentrates for vegetable nectar	1000	mg/kg		Justification of technological need is requested. Use could mislead consumers
<b>15.3</b>	<b>Snacks - fish based</b>	<b>100</b>	<b>mg/kg</b>		<b>EC could support this provision</b>

<sup>38</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>39</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>40</sup> **Note 117:** Except for use in loganiza (fresh, uncured sausage) at 1000 mg/kg.

## CAROTENOIDS ((INS 160ai, 160aii, 160e, 160f)

### Recommendation 1 – Carotenoids, INS 160ai, 160aii, 160e, 160f

The eWG recommends that the 39<sup>th</sup> CCFA **discontinue** further work on the following food additive provisions for carotenoids in the GSFA.

### EC agrees with recommendation 1

### Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for carotenoids in the GSFA.

Food Cat No.	Food Category	Max Level		Comments	EC comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	150	mg/kg	Note 52 <sup>41</sup>	
01.3.2	beverage whiteners	100	mg/kg	Note CC <sup>42</sup>	Discontinue Technological need is questioned
01.4	cream (plain) and the like	20	mg/kg	Note CC	Discontinue Technological need questioned
01.5.2	milk and cream powder analogues	100	mg/kg	Note CC	Discontinue Technological need is questioned
01.6.1	unripened cheese	100	mg/kg	Note CC	Discontinue Technological need is questioned in particular because rind is not expected to be formed in unripened cheese
01.6.2.1	ripened cheese, includes rind	100	mg/kg	Note CC	
01.6.2.2	rind of ripened cheese	500	mg/kg	Note CC	
01.6.2.3	cheese powder (for reconstitution; e.g., for cheese sauces)	100	mg/kg	Note CC	
01.6.4	processed cheese	100	mg/kg	Note CC	
01.6.5	cheese analogues	200	mg/kg	Note CC	
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50	mg/kg	Note CC	
02.2.1.2	margarine and similar products	25	mg/kg	Note CC	
02.2.1.3	blends of butter and margarine	100	mg/kg	Note CC	
02.2.2	emulsions containing less than 80% fat	25	mg/kg	Note CC	
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	200	mg/kg	Note CC	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	150	mg/kg	Note CC	
03.0	edible ices, including sherbet and sorbet	200	mg/kg	Note CC	
04.1.2.3	fruit in vinegar, oil, or brine	1000	mg/kg		
04.1.2.5	jams, jellies and marmelades	200	mg/kg		
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		
04.1.2.7	candied fruit	200	mg/kg		
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg	Note CC	

<sup>41</sup> Note 52: Excluding chocolate milk

<sup>42</sup> Note CC: Expressed as beta-carotene.

<b>Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for carotenoids in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg		
04.1.2.11	fruit fillings for pastries	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
04.2.1.2	surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	500	mg/kg	<b>Note 4<sup>43</sup>, &amp;1644</b>	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	
05.1.2	cocoa mixes (syrups)	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned. The use could mislead the consumer
05.1.3	cocoa-based spreads, including fillings	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned. The use could mislead the consumer
05.1.4	cocoa and chocolate products	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned. The use could mislead the consumer
05.1.5	imitation chocolate, chocolate substitute products	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
05.3	chewing gum	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
06.3	breakfast cereals, including rolled oats	200	mg/kg		
06.4.3	pre-cooked pastas and noodles and like products	1200	mg/kg	<b>Note CC</b>	<a href="#">EC does not agree</a> with the use of colours in pre-cooked pastas. However, could agree with the use <a href="#">in instant noodles only</a> , if this is in accordance with CODEX STAN 249-2006
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	150	mg/kg	<b>Note CC</b>	
06.6	batters (e.g., for breading or batters for fish or poultry)	500	mg/kg		
07.2	fine bakery wares (sweet, salty, savoury) and mixes	<b>100</b>	<b>mg/kg</b>	<b>Note CC</b>	
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	100	mg/kg	<b>Note 118<sup>45</sup></b>	Glazes and coatings only.

<sup>43</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>44</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>45</sup> **Note 118:** Except for use in tocino (fresh, cured sausage) at 1000 mg/kg.

<b>Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for carotenoids in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	20	mg/kg		Glazes and coatings only.
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	20	mg/kg		Glazes and coatings only.
08.3.2	heat-treated processed comminuted meat, poultry, and game products	20	mg/kg		Glazes and coatings only.
09.1.1	Fresh fish	300	mg/kg	<b>Notes 50<sup>46</sup></b>	
09.2	processed fish and fish products, including mollusks, crustaceans, and echinoderms	<b>100</b>	<b>mg/kg</b>	<b>Note 95<sup>47</sup> &amp; CC</b>	
09.3	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	<b>100</b>	<b>mg/kg</b>	<b>Note 95, &amp; CC</b>	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	<b>100</b>	<b>mg/kg</b>	<b>Note 95, &amp; CC</b>	
10.1	fresh eggs	1000	mg/kg	Note 4 <sup>48</sup>	
10.2	egg products	1000	mg/kg		Discontinue Technological need questioned
10.4	egg-based desserts (e.g., custard)	150	mg/kg		
12.2.2	seasonings and condiments	500	mg/kg		
12.4	mustards	300	mg/kg		
12.5	soups and broths	300	mg/kg		
12.6	sauces and like products	500	mg/kg		
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	
12.9.5	other protein products	100	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg	<b>Note CC</b>	
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg	<b>Note CC</b>	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg	<b>Note CC</b>	
13.6	food supplements	300	mg/kg	<b>Note CC</b>	
14.1.3.2	vegetable nectar	100	mg/kg	<b>Note CC</b>	Doesn't support the use could mislead the consumer
14.1.3.4	concentrates for vegetable nectar	100	mg/kg	<b>Note CC &amp; 127<sup>49</sup></b>	Doesn't support the use could mislead the consumer
14.1.4	water-based flavoured drinks, including "sport," "energy," or	100	mg/kg		

<sup>46</sup> **Note 50:** For use in fish roe only

<sup>47</sup> **Note 95:** For use in surimi and fish roe products only.

<sup>48</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>49</sup> **Note 127:** As served to the consumer

<b>Recommendation 2 - Carotenoids, INS 160ai, 160aii, 160e, 160f</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for carotenoids in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
	"electrolyte" drinks and particulated drinks				
14.2.2	cider and perry	200	mg/kg	<b>Note CC</b>	
14.2.4	wines (other than grape)	200	mg/kg		
14.2.6	distilled spirituous beverages containing more than 15% alcohol	200	mg/kg		
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	100	mg/kg	<b>Note CC</b>	
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg	<b>Note CC</b>	

<b>Recommendation 3 - Carotenoids, INS 160ai, 160aii, 160e, 160f</b>					
<b>Comments are requested</b> on the following food additive provisions for carotenoids in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
<b>01.4.4</b>	<b>Cream analogues</b>	<b>20</b>	<b>mg/kg</b>		Technological need questioned
02.1.2	vegetable oils and fats	1000	mg/kg		Technological need questioned. The use could mislead the consumer
02.1.3	lard, tallow, fish oil, and other animal fats	1000	mg/kg		Technological need questioned. The use could mislead the consumer
04.1.2.4	canned or bottled (pasteurized) fruit	200	mg/kg		Technological need questioned. The use could mislead the consumer Only for red fruits preserves
04.2.2.2	dried vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	1000	mg/kg		Technological need questioned this use could mislead the consumer only dried potato granules and flakes
04.2.2.4	canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned this use could mislead the consumer Most Codex standards on canned vegetables contain no use of colours only processed mushy and garden peas
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	Technological need questioned this use could mislead the consumer
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	<b>50</b>	<b>mg/kg</b>	<b>Note CC</b>	

<b>Recommendation 3 - Carotenoids, INS 160ai, 160aii, 160e, 160f</b>					
<b>Comments are requested</b> on the following food additive provisions for carotenoids in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max Level</b>		<b>Comments</b>	<b>EC comments</b>
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	50	mg/kg	Note CC	
07.1.1	bread and rolls	35	mg/kg		Doesn't support. Technological need questioned These products are broadly consumed
07.1.2	crackers, excluding sweet crackers	1000	mg/kg		Doesn't support. Technological need questioned These products are broadly consumed
07.1.3	other ordinary bakery products (e.g., bagels, pita, English muffins)	1000	mg/kg		Doesn't support. Technological need questioned These products are broadly consumed
07.1.4	bread-type products, including bread stuffing and bread crumbs	1000	mg/kg	Note 116 <sup>50</sup>	Doesn't support. Technological need questioned These products are broadly consumed
07.1.5	steamed breads and buns	1000	mg/kg		Doesn't support. Technological need questioned These products are broadly consumed
07.1.6	mixes for breads and ordinary bakery wares		GMP		Doesn't support. Technological need questioned These products are broadly consumed
08.1.2	fresh meat, poultry, and game, comminuted	100	mg/kg	Note 117 <sup>51</sup> & 4 <sup>52</sup> , 16 <sup>53</sup>	
08.4	<b>Edible casings (e.g., sausage casings)</b>	100	mg/kg	Note CC	
09.1.2	<b>Fresh mollusks, crustaceans and echinoderms</b>	100	mg/kg	Note 4, 16 & CC	Doesn't support. Technological need questioned such use could mislead consumer
11.3	<b>Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3</b>	50	mg/kg		Doesn't support. Technological need questioned
11.4	<b>Other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)</b>	50	mg/kg		Doesn't support. Technological need questioned
11.6	<b>table-top sweeteners, including those containing high-intensity sweeteners</b>	300,	mg/kg		Doesn't support. The use could mislead the consumer.
14.2.1	<b>Beer and malt beverages</b>	200	mg/kg		
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		Justification should be provided why the carry over wouldn't be sufficient. In addition all foodstuffs should be clearly defined

<sup>50</sup> **Note 116:** For use in doughs only.

<sup>51</sup> **Note 117:** Except for use in loganiza (fresh, uncured sausage) at 1000 mg/kg.

<sup>52</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>53</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

## CHLOROPHYLL, COPPER COMPLEXES (INS 141i & 141ii)

8. The 28<sup>th</sup> CAC has adopted several provisions in the GSFA for the use of chlorophylls, copper complexes.

9. The 13<sup>th</sup> JECFA (1969) assigned an ADI of 15 mg/kg bw/d for chlorophylls, copper complexes (141i & 141ii).

### Recommendation 1 – Chlorophyll, Copper Complexes, INS 141i, 141ii

The eWG recommends that the 39<sup>th</sup> CCFA **discontinue** further work on the following food additive provisions for copper complexes of chlorophyll in the GSFA.

### [The European Community agrees with Recommendation 1.](#)

### Recommendation 2 - Chlorophyll, Copper Complexes, INS 141i, 141ii

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for copper complexes of chlorophyll in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	EC COMMENTS
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50	mg/kg	Note 52 <sup>54</sup>	
01.6.1	unripened cheese	50	mg/kg		Technological need is questioned in particular because rind is not expected to be formed in unripened cheese. The proposed level is higher than in STAN 221 (15 mg/kg)
01.6.2.1	ripened cheese, includes rind	15	mg/kg		EC supports the use of this colour only in Sage Derby Cheese and rind.
01.6.2.2	rind of ripened cheese	75	mg/kg		
01.6.2.3	cheese powder (for reconstitution; e.g., for cheese sauces)	50	mg/kg		
01.6.4.2	<b>Flavoured processed cheese, including containing fruit, vegetables, meat, etc.</b>	<b>50</b>	<b>mg/kg</b>		EC supports this provision.
01.6.5	cheese analogues	50	mg/kg		
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	200	mg/kg		
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	500	mg/kg		EC supports this provision.
03.0	edible ices, including sherbet and sorbet	500	mg/kg		EC supports this provision.
04.1.2.5	jams, jellies and marmelades	200	mg/kg		EC supports this provision.
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	150	mg/kg		EC supports this provision.
04.1.2.7	candied fruit	250	mg/kg		EC supports this provision.

<sup>54</sup> Note 52: Excluding chocolate milk

**Recommendation 2 - Chlorophyll, Copper Complexes, INS 141i, 141ii**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for copper complexes of chlorophyll in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC COMMENTS</b>
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	150	mg/kg	Note 62 <sup>55</sup>	<a href="#">EC supports this provision.</a>
05.2.1	hard candy	700	mg/kg		<a href="#">EC supports this provision.</a>
05.2.2	soft candy	100	mg/kg		<a href="#">EC supports this provision.</a>
05.2.3	nougats and marzipans	100	mg/kg		<a href="#">EC supports this provision.</a>
05.3	chewing gum	700	mg/kg		<a href="#">EC supports this provision.</a>
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg		<a href="#">EC supports this provision.</a>
06.4.3	pre-cooked pastas and noodles and like products	100	mg/kg		<a href="#">EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use <u>in instant noodles only</u>, if this is in accordance with CODEX STAN 249-2006</a>
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	75	mg/kg		<a href="#">EC supports this provision.</a>
07.2	fine bakery wares (sweet, salty, savoury) and mixes	75	mg/kg		<a href="#">EC supports this provision.</a>
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	40	mg/kg	<b>Note 95<sup>56</sup></b>	<a href="#">EC supports this provision.</a>
09.2.4.1	cooked fish and fish products	30	mg/kg	<b>Note 62 &amp; 95</b>	<a href="#">EC supports this provision.</a>
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	40	mg/kg	<b>Note 62 &amp; 95</b>	<a href="#">EC supports this provision.</a>
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	mg/kg		
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	40	mg/kg	<b>Note 16</b>	<a href="#">EC supports this provision.</a>
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	40	mg/kg	<b>Note 16</b>	<a href="#">EC supports this provision.</a>
09.3.3	salmon substitutes,	200	mg/kg		<a href="#">EC supports this provision.</a>

<sup>55</sup> **Note 62:** As copper.

<sup>56</sup> **Note 95:** For use in surimi and fish roe products only.

<b>Recommendation 2 - Chlorophyll, Copper Complexes, INS 141i, 141ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for copper complexes of chlorophyll in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC COMMENTS</b>
	caviar, and other fish roe products				
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	75	mg/kg	<b>Note 95</b>	EC supports this provision.
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	<b>Note 95</b>	EC supports this provision.
10.4	egg-based desserts (e.g., custard)	300	mg/kg	Note 2 <sup>57</sup>	EC supports this provision.
12.2.2	seasonings and condiments	<b>500</b>	<b>mg/kg</b>		EC supports this provision.
12.4	mustards	<b>500</b>	<b>mg/kg</b>		EC supports this provision.
<b>12.5</b>	<b>soups and broths</b>	<b>400</b>	<b>mg/kg</b>	<b>Note 127<sup>58</sup></b>	EC supports this provision.
12.6	sauces and like products	100	mg/kg		EC supports this provision.
13.6	food supplements	<b>500</b>	<b>mg/kg</b>	<b>Note 3<sup>59</sup></b>	EC supports this provision.
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg		EC supports this provision.
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	350	mg/kg		EC supports this provision.
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		EC supports this provision.

<b>Recommendation 3 - Chlorophyll, Copper Complexes, INS 141i, 141ii</b>					
<b>Comments are requested</b> on the following food additive provisions for copper complexes of chlorophyll in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
<b>04.2.1.2</b>	<b>Surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses</b>		<b>GMP</b>	<b>Notes 4<sup>60</sup> &amp; 16<sup>61</sup></b>	

<sup>57</sup> **Note 2:** On dry ingredient, dry weight, dry mix or concentrate basis.

<sup>58</sup> **Note 127** As served to the consumer.

<sup>59</sup> **Note 3:** Surface treatment

<b>Recommendation 3 - Chlorophyll, Copper Complexes, INS 141i, 141ii</b>					
<b>Comments are requested</b> on the following food additive provisions for copper complexes of chlorophyll in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	<b>and legumes, and aloe vera), seaweeds, and nuts and seeds</b>				
05.1.2	cocoa mixes (syrups)	6.4	mg/kg	Note 62	Doesn't support. The use could mislead the consumer.
05.1.3	cocoa-based spreads, including fillings	6.4	mg/kg	Note 62	Doesn't support. The use could mislead the consumer
05.1.4	cocoa and chocolate products	700	mg/kg		Doesn't support. The use could mislead the consumer
05.1.5	imitation chocolate, chocolate substitute products	700	mg/kg		6
07.1.4	bread-type products, including bread stuffing and bread crumbs	6.4	mg/kg	Note 62	This is a basic food and the use will increase the intake of the colour. Moreover, this use could mislead the consumer ----
14.1.5	<b>Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa</b>				<b>Disagree.</b>
15.3	<b>Snacks –fish based</b>	<b>350</b>	<b>mg/kg</b>		

**EC supports Recommendation 3 for request of information.**

**ERYTHROSINE (INS 127)**

**Due to the very low ADI, in the EC the permitted uses of erythrosine are restricted to cocktail cherries and candied cherries at 200 mg/kg and Bigarreaux cherries in syrup and in cocktails at 150 mg/kg. Therefore the EC supports discontinuation of the work on all specific provisions**

**FAST GREEN FCF (INS 143)**

10. The 30<sup>th</sup> JECFA (1986) assigned an ADI of 25 mg/kg bw/d for fast green FCF.

<b>Recommendation 1 – Fast Green FCF, INS 143</b> The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for fast green FCF in the GSFA.
--

**The European Community agrees with Recommendation 1. However, EC opposes the use of Fast Green in the wider category 07.0, which covers highly consumed staple foods, but could support the use in category 7.2 fine bakery wares only**

<b>Recommendation 2 – Fast Green FCF, INS 143</b>						
The eWG recommends that the 39 <sup>th</sup> CCFA <b>revoke</b> the following food additive provisions for fast green FCF in the GSFA.						
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>	<b>Justification provided to eWG</b>
07.1.1	bread and rolls	100	mg/kg			Consequential effect if recommendation 3 for category 07.0 is endorsed.
07.2	fine bakery wares (sweet, salty, savoury) and mixes	100	mg/kg			

<sup>60</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>61</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

**EC opposes the use of Fast Green in the wider category 07.0, which covers highly consumed staple foods, but could support the use in category 7.2 fine bakery wares only**

<b>Recommendation 3 - Fast Green FCF, INS 143</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for fast green FCF in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	100	mg/kg		EC agree
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	100	mg/kg		EC agree
04.1.2.7	candied fruit	100	mg/kg		EC agree
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	100	mg/kg		EC agree
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	100	mg/kg		EC agree
04.1.2.11	fruit fillings for pastries	100	mg/kg		EC agree
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	<b>100</b>	<b>mg/kg</b>		
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	100	mg/kg		EC agree
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	100	mg/kg		EC agrees
06.4.2	dried pastas and noodles and like products	100	mg/kg		<b>EC opposes the use in this staple food with high consumption.</b>
06.4.3	pre-cooked pastas and noodles and like products	<b>300</b>	<b>mg/kg</b>		EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use <u>in instant noodles only</u> , if this is in accordance with CODEX STAN 249-2006
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	100	mg/kg		EC agrees
07.0	bakery wares	100	mg/kg		EC opposes in wider category could support in category 7.2 fine bakery wares only
08.1	fresh meat, poultry, and game	100	mg/kg	Notes 3 <sup>62</sup> , 4 <sup>63</sup> , & 16 <sup>64</sup>	Glazes and coatings only
08.2	processed meat, poultry, and game products in whole pieces or cuts	100	mg/kg	Notes 3 & 4	Glazes and coatings only
08.4	edible casings (e.g., sausage casings)	100	mg/kg	Notes 3 & 4	EC agrees
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	100	mg/kg	<b>Note 95<sup>65</sup></b>	EC agrees

<sup>62</sup> **Note 3:** Surface treatment.

<sup>63</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>64</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<b>Recommendation 3 - Fast Green FCF, INS 143</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for fast green FCF in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
10.4	egg-based desserts (e.g., custard)	100	mg/kg		EC agrees
12.2.2	seasonings and condiments	100	mg/kg		EC agrees
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	100	mg/kg		EC agrees
13.6	food supplements	<b>600</b>	<b>mg/kg</b>		EC agrees

### GRAPE SKIN EXTRACT (INS 163ii)

11. The 26<sup>th</sup> JECFA (1982) assigned an ADI of 2.5 mg/kg bw/d for grape skin extract.

<b>Recommendation 1 – Grape Skin Extracts, INS 163ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for grape skin extracts in the GSFA.					

### EC agrees with recommendation 1

<b>Recommendation 2 - Grape Skin Extracts, INS 163ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for grape skin extracts in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments</b>
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	<b>150</b>	<b>mg/kg</b>	Note 52 <sup>65</sup> , & DD <sup>67</sup>	
01.6.2.2	rind of ripened cheese	1000	mg/kg		
01.6.4.2	flavoured processed cheese, including containing fruit, vegetables, meat, etc.	1000	mg/kg		
01.6.5	cheese analogues	1000	mg/kg		
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	<b>200</b>	<b>mg/kg</b>	Note DD	
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	<b>200</b>	<b>mg/kg</b>	Note DD	
03.0	edible ices, including sherbet and sorbet	<b>100</b>	<b>mg/kg</b>	Note DD	
04.1.1.2	surface-treated fresh fruit		GMP	Notes 4 <sup>68</sup> & 16 <sup>69</sup>	
04.1.2.3	fruit in vinegar, oil, or brine	1500	mg/kg		
04.1.2.5	jams, jellies and marmelades	<b>500</b>	<b>mg/kg</b>	Note DD	
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg	Note DD	
04.1.2.7	candied fruit	1500	mg/kg		
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	<b>500</b>	<b>mg/kg</b>	Note DD	
04.1.2.9	fruit-based desserts, including	<b>500</b>	<b>mg/kg</b>	Note DD	

<sup>65</sup> **Note 95** For use in surimi and fish roe products only.

<sup>66</sup> **Note 52:** Excluding chocolate milk

<sup>67</sup> **Note DD:** Expressed as anthocyanin.

<sup>68</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<sup>69</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

**Recommendation 2 - Grape Skin Extracts, INS 163ii**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for grape skin extracts in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments</b>
	fruit-flavoured water-based desserts				
04.1.2.10	fermented fruit products	<b>500</b>	<b>mg/kg</b>	<b>Note DD</b>	
04.1.2.11	fruit fillings for pastries	<b>500</b>	<b>mg/kg</b>	<b>Note DD</b>	
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	<b>100</b>	<b>mg/kg</b>	<b>Note DD</b>	
04.2.2.5	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads (e.g., peanut butter)	<b>100</b>	<b>mg/kg</b>	<b>Note DD</b>	
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	<b>100</b>	<b>mg/kg</b>	<b>Note DD</b>	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	<b>100</b>	<b>mg/kg</b>	<b>Note DD</b>	
05.1.5	imitation chocolate, chocolate substitute products	<b>200</b>	<b>mg/kg</b>	<b>Note DD</b>	
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	<b>500</b>	<b>mg/kg</b>	<b>Note DD</b>	
05.3	chewing gum	500	mg/kg	<b>Note DD</b>	
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>500</b>	<b>mg/kg</b>	<b>Note DD</b>	
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	<b>200</b>	<b>mg/kg</b>	<b>Note DD</b>	
08.2	processed meat, poultry, and game products in whole pieces or cuts	5000	mg/kg		Add note 16
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	5000	mg/kg		Glazes and coatings only.
08.4	edible casings (e.g., sausage casings)	5000	mg/kg		
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	<b>Note 16</b>	Use in frozen battered fish and fish fillets may mislead the consumer

**Recommendation 2 - Grape Skin Extracts, INS 163ii**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for grape skin extracts in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments</b>
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms		GMP	Note 16 & 95 <sup>70</sup>	
09.2.4.1	cooked fish and fish products	500	mg/kg	<b>Note 95</b>	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	1000	mg/kg		
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Note 16 & 95	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	1000	mg/kg	Note 22 <sup>71</sup>	
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	500	mg/kg	Note 16	
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	1500	mg/kg	Note 16	
09.3.3	salmon substitutes, caviar, and other fish roe products	1500	mg/kg		
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	1500	mg/kg	Note 16	
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	1500	mg/kg	<b>Note 16</b>	
10.4	egg-based desserts (e.g., custard)	<b>200</b>	<b>mg/kg</b>	<b>Note DD</b>	
<b>12.2.2</b>	<b>Seasonings and condiments</b>	<b>1500</b>	<b>mg/kg</b>		
12.4	mustards	<b>200</b>	<b>mg/kg</b>	<b>Note DD</b>	
12.5	soups and broths	<b>500</b>	<b>mg/kg</b>	<b>Note DD</b>	
12.6.1	emulsified sauces (e.g., mayonnaise, salad dressing)	<b>300</b>	<b>mg/kg</b>	<b>Note DD</b>	
12.6.2	non-emulsified sauces (e.g., ketchup, cheese sauce, cream sauce, brown gravy)	<b>300</b>	<b>mg/kg</b>	<b>Note DD</b>	
12.6.3	mixes for sauces and gravies	<b>300</b>	<b>mg/kg</b>	<b>Note DD</b>	
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	1500	mg/kg		
12.9.5	other protein products	500	mg/kg		

<sup>70</sup> **Note 95** For use in surimi and fish roe products only.

<sup>71</sup> **Note 22:** For use in smoked fish products only.

<b>Recommendation 2 - Grape Skin Extracts, INS 163ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for grape skin extracts in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments</b>
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	250	mg/kg	Note DD	
13.4	dietetic formulae for slimming purposes and weight reduction	250	mg/kg	Note DD	
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	250	mg/kg	Note DD	
13.6	food supplements	250	mg/kg	Note DD	
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	300	mg/kg	Note DD	
14.2.1	beer and malt beverages	300	mg/kg	Note DD	Justification of technological need is requested. Use could mislead consumers
14.2.2	cider and perry	300	mg/kg	Note DD	
14.2.4	wines (other than grape)	300	mg/kg	Note DD	
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg	Note DD	Justification of technological need is requested. Use could mislead consumers
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	300	mg/kg	Note DD	
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	500	mg/kg	Note DD	
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	300	mg/kg	Note DD	

## INDIGOTINE (INS 132)

12. The 18<sup>th</sup> JECFA (1974) assigned an ADI of 5 mg/kg bw/d for indigotine.

<b>Recommendation 1 – Indigotine, INS 132</b>
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for indigotine in the GSFA.

## EC agrees with recommendation 1

<b>Recommendation 2 - Indigotine, INS 132</b>
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for indigotine in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	mg/kg	<b>Note 52<sup>72</sup></b>	Suggested 100 mg. Level is sufficient
01.6.2.2	rind of ripened cheese	100	mg/kg		
01.6.5	cheese analogues	200	mg/kg	Note 3	100 mg/kg sufficient
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	<b>150</b>	<b>mg/kg</b>		
02.1.3	lard, tallow, fish oil, and other animal fats	<b>300</b>	<b>mg/kg</b>		Discontinue Technological need questioned. Use could mislead the consumer
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		Doesn't support
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	<b>150</b>	<b>mg/kg</b>		
03.0	edible ices, including sherbet and sorbet	<b>150</b>	<b>mg/kg</b>		
04.1.2.5	jams, jellies and marmelades	<b>300</b>	<b>mg/kg</b>		Does not support
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	<b>300</b>	<b>mg/kg</b>		
04.1.2.7	candied fruit	200	mg/kg		
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	<b>150</b>	<b>mg/kg</b>		
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	<b>150</b>	<b>mg/kg</b>		
04.1.2.11	fruit fillings for pastries	<b>150</b>	<b>mg/kg</b>		
04.2.2.3	vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce	<b>150</b>	<b>mg/kg</b>		Does not support
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	200	mg/kg	<b>Note 92<sup>73</sup></b>	
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	<b>300</b>	<b>mg/kg</b>		
05.1.5	imitation chocolate, chocolate substitute products	<b>300</b>	<b>mg/kg</b>		
05.2	confectionery including hard	<b>300</b>	<b>mg/kg</b>		

<sup>72</sup> **Note 52:** Excluding chocolate milk

<sup>73</sup> **Note 92:** Excluding tomato-based products

<b>Recommendation 2 - Indigotine, INS 132</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for indigotine in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4				
05.3	chewing gum	300	mg/kg		
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>300</b>	<b>mg/kg</b>		
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	<b>150</b>	<b>mg/kg</b>		
<b>07.2</b>	<b>Fine bakery wares (sweet, salty, savoury) and mixes</b>	<b>200</b>	<b>mg/kg</b>		
09.1.1	fresh fish	300	mg/kg	Note 50 <sup>74</sup> & 16 <sup>75</sup>	
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 95 <sup>76</sup>	
09.2.4.1	cooked fish and fish products	<b>300</b>	<b>mg/kg</b>	<b>Note 95</b>	
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg	<b>Note 16</b>	
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 22 <sup>77</sup>	
09.3.3	salmon substitutes, caviar, and other fish roe products	<b>300</b>	<b>mg/kg</b>		
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	<b>300</b>	<b>mg/kg</b>		For fish roe and surimi only Suggested 100 mg
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>		For fish roe and surimi only
10.1	fresh eggs	300	mg/kg	Note 4 <sup>78</sup>	
10.4	egg-based desserts (e.g., custard)	300	mg/kg		Support at 150 mg/kg. Level sufficient for the technological need.
12.2.2	seasonings and condiments	<b>300</b>	<b>mg/kg</b>		
12.4	mustards	300	mg/kg		
12.5	soups and broths	<b>50</b>	<b>mg/kg</b>		
12.6	sauces and like products	<b>300</b>	<b>mg/kg</b>		
12.9.5	other protein products	100	mg/kg		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories	300	mg/kg		

<sup>74</sup> **Note 50:** For use in fish roe only.

<sup>75</sup> **Note 16** For use in glaze, coatings or decorations for fruit, vegetables, nut or fish.

<sup>76</sup> **Note 95:** For use in surimi and fish roe products only.

<sup>77</sup> **Note 22:** For use in smoked fish products only.

<sup>78</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<b>Recommendation 2 - Indigotine, INS 132</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for indigotine in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	13.1-13.4 and 13.6				
13.6	food supplements	300	mg/kg		
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	<b>100</b>	<b>mg/kg</b>		
14.2.2	cider and perry	200	mg/kg		
14.2.4	wines (other than grape)	200	mg/kg		
14.2.6	distilled spirituous beverages containing more than 15% alcohol	300	mg/kg		
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	<b>200</b>	<b>mg/kg</b>		
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		

<b>Recommendation 3 - Indigotine, INS 132</b>					
<b>Comments are requested</b> on the following food additive provisions for indigotine in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
<b>01.6.4.2</b>	<b>Flavoured processed cheese, including containing fruit, vegetables, meat, etc.</b>	<b>100</b>	<b>mg/kg</b>		<b>In line with EC</b>
11.3	sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3	300	mg/kg		Doesn't support. Use could mislead the consumer.
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	300	mg/kg		Doesn't support. Use could mislead the consumer.
11.6	table-top sweeteners, including those containing high-intensity sweeteners	300	mg/kg		Doesn't support. Use could mislead the consumer.
<b>14.1.5</b>	<b>Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa</b>				Doesn't support. Use could mislead the consumer.

### **IRON OXIDES (INS 172i, 172ii, 172iii)**

<b>Recommendation 1 – Iron Oxides, INS 172i, 172ii, 172iii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for iron oxides in the GSFA.					

### **EC agrees with recommendation 1**

<b>Recommendation 2 - Iron Oxides, INS 172i, 172ii, 172iii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for iron oxides in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.6.1	unripened cheese		GMP		<b>Need questioned rind is not</b>

<b>Recommendation 2 - Iron Oxides, INS 172i, 172ii, 172iii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for iron oxides in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
					expected to be formed in unripened cheese
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	<b>300</b>	<b>mg/kg</b>	<b>Note 92<sup>79</sup></b>	Agree
05.3	chewing gum	10.000	mg/kg		
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	50	mg/kg		
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	<b>50</b>	<b>mg/kg</b>		
10.4	egg-based desserts (e.g., custard)		GMP		
12.4	mustards		GMP		
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3		GMP		
12.9.5	other protein products		GMP		
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)		GMP		
13.4	dietetic formulae for slimming purposes and weight reduction		GMP		
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6		GMP		
13.6	food supplements	<b>7500</b>	<b>mg/kg</b>	<b>Note 3<sup>80</sup></b>	
14.1.3.2	vegetable nectar	<b>100</b>	<b>mg/kg</b>		Justification of technological need is requested. Use could mislead consumers
14.1.3.4	concentrates for vegetable nectar	<b>100</b>	<b>mg/kg</b>	<b>Note 127<sup>81</sup></b>	Justification of technological need is requested. Use could mislead consumers

<sup>79</sup> **Note 92:** Excluding tomato-based sauces

<sup>80</sup> **Note 3:** Surface treatment

<sup>81</sup> **Note 127:** As served to the consumer.

**PONCEAU 4R (INS 124)**

13. The 26<sup>th</sup> JECFA (1982) assigned an ADI of 4 mg/kg bw/d for ponceau 4R.

**Recommendation 1 – Ponceau 4R, INS 124**

The eWG recommends that the 39<sup>th</sup> CCFA **discontinue** further work on the following food additive provisions for ponceau 4R in the GSFA.

**The European Community agrees to discontinue work on the provisions under recommendation 1.**

**Recommendation 2 - Ponceau 4R, INS 124**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for ponceau 4R in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	150	mg/kg		EC support level of 50 mg/kg because of intake considerations*
01.6.2.2	rind of ripened cheese	100	mg/kg		EC agree
<b>01.6.4.2</b>	<b>Flavoured processed cheese, including containing fruit, vegetables, meat, etc.</b>	<b>100</b>	<b>mg/kg</b>		<b>EC agree</b>
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	<b>50</b>	<b>mg/kg</b>		EC agree
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	<b>50</b>	<b>mg/kg</b>		EC Agree
03.0	edible ices, including sherbet and sorbet	<b>50</b>	<b>mg/kg</b>		EC agree
04.1.2.5	jams, jellies and marmelades	<b>100</b>	<b>mg/kg</b>		EC agree
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	500	mg/kg		
04.1.2.7	candied fruit	200	mg/kg		EC agree
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	<b>50</b>	<b>mg/kg</b>		
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	<b>50</b>	<b>mg/kg</b>		EC agree
04.1.2.11	fruit fillings for pastries	<b>50</b>	<b>mg/kg</b>		EC agrees
05.1.5	imitation chocolate, chocolate substitute products	<b>50</b>	<b>mg/kg</b>		EC agree
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	<b>50</b>	<b>mg/kg</b>		EC agree
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>50</b>	<b>mg/kg</b>		EC agree
06.5	cereal and starch based desserts (e.g., rice	<b>50</b>	<b>mg/kg</b>		EC agree

**Recommendation 2 - Ponceau 4R, INS 124**

The eWG recommends that the 39<sup>th</sup> CCFA **adopt** the following food additive provisions for ponceau 4R in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	pudding, tapioca pudding)				
08.4	edible casings (e.g., sausage casings)	500	mg/kg	Note 16 <sup>82</sup>	EC agree
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16	Glazes and coatings only
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	Note 16 & 95 <sup>83</sup>	EC agree
09.2.4.1	cooked fish and fish products	500	mg/kg	<b>Note 95</b>	EC agree
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		EC agree
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	<b>100</b>	<b>mg/kg</b>	Note 22 <sup>84</sup>	EC agree
09.3.3	salmon substitutes, caviar, and other fish roe products	500	mg/kg		EC agree
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	<b>100</b>	<b>mg/kg</b>		EC agree
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg		EC agree
10.4	egg-based desserts (e.g., custard)	<b>50</b>	<b>mg/kg</b>		EC agree
12.2.2	seasonings and condiments	500	mg/kg		EC agree
12.4	mustards	300	mg/kg		EC agree
12.5	soups and broths	<b>50</b>	<b>mg/kg</b>		EC agree
12.6	sauces and like products	<b>50</b>	<b>mg/kg</b>		EC agree
12.7	salads (e.g., macaroni salad, potato salad) and sandwich spreads excluding cocoa- and nut-based spreads of food categories 04.2.2.5 and 05.1.3	200	mg/kg		
12.9.5	other protein products	100	mg/kg		EC agree
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		EC agree
13.5	dietetic foods (e.g., supplementary foods for	300	mg/kg		EC agree

<sup>82</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

<sup>83</sup> **Note 95:** For use in surimi and fish roe products only

<sup>84</sup> **Note 22:** For use in smoked fish products only.

<b>Recommendation 2 - Ponceau 4R, INS 124</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for ponceau 4R in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	dietary use) excluding products of food categories 13.1 - 13.4 and 13.6				
13.6	food supplements	300	mg/kg		EC agree
14.1.4	water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	50	mg/kg		EC agree
14.2.2	cider and perry	200	mg/kg		EC agree
14.2.6	distilled spirituous beverages containing more than 15% alcohol	200	mg/kg		EC agree
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		EC agree
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		EC agree
15.2	processed nuts, including covered nuts and nut mixtures (with e.g., dried fruit)	100	mg/kg		EC agree

<b>Recommendation 3 - Ponceau 4R, INS 124</b>					
<b>Comments are requested</b> on the following food additive provisions for ponceau 4R in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
01.6.1	unripened cheese	100	mg/kg	Note 3 <sup>85</sup>	Support request for technological justification
01.6.5	cheese analogues	100	mg/kg	Note 3	Support request for technological justification
04.1.2.4	canned or bottled (pasteurized) fruit	300	mg/kg		EC opposes
04.2.2.7	fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10	500	mg/kg		EC opposes
05.3	chewing gum	300	mg/kg		
07.0	bakery wares	200	mg/kg		Oppose in wider category 07.2 would be acceptable
09.1.2	fresh mollusks, crustaceans, and echinoderms	500	mg/kg	Notes 4 <sup>86</sup> & 16	Glazes and coatings only
10.1	fresh eggs	500	mg/kg	Note 4	EC supports
11.4	other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)	200	mg/kg		EC opposes
11.6	table-top sweeteners, including those containing	200	mg/kg		EC opposes

<sup>85</sup> **Note 3:** Surface treatment.

<sup>86</sup> **Note 4:** For decoration, stamping, marking or branding the product.

<b>Recommendation 3 - Ponceau 4R, INS 124</b>					
<b>Comments are requested</b> on the following food additive provisions for ponceau 4R in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC comments</b>
	high-intensity sweeteners				
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		EC supports
14.2.4	wines (other than grape)	200	mg/kg		EC supports if needed in products within this category
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		EC oppose – Foodstuffs should always be clearly defined

**\* For the higher use levels (150mg/kg) proposed in categories 1.1.2 the EC notes that a 15kg child would have to consume the following volumes of soft drink coloured at the corresponding level to reach the ADI:**

<b>Colour level mg/l</b>	<b>Volume soft drink consumed to reach ADI</b>
<b>300</b>	<b>200ml</b>
<b>200</b>	<b>300ml</b>
<b>100</b>	<b>600ml</b>
<b>50</b>	<b>1200ml</b>

#### **RIBOFLAVINS (INS 101i, 101ii)**

14. The 28<sup>th</sup> CAC has adopted several provisions in the GSFA for the use of riboflavins.

15. The 51<sup>st</sup> JECFA assigned a group ADI for synthetic riboflavin (101i) and riboflavin-5'-phosphate (101ii) of 0.5 mg/kg bw/d.

<b>Recommendation 1 – Riboflavins, INS 101i, 101ii</b>	
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for riboflavins in the GSFA.	

#### **EC supports Recommendation 1.**

<b>Recommendation 2 - Riboflavins, INS 101i, 101ii</b>						
The eWG recommends that the 39 <sup>th</sup> CCFA <b>revoke</b> the following food additive provisions for riboflavins in the GSFA.						
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>Justification provided to eWG</b>	
12.5.1	ready-to-eat soups and broths, including canned, bottled, and frozen	200	mg/kg		Superseded by 12.5 at 400 mg/kg from commodity standard. See recommendation 3	
12.5.2	mixes for soups and broths	150	mg/kg			

#### **EC supports Recommendation 2.**

<b>Recommendation 3 - Riboflavins, INS 101i, 101ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for riboflavins in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC COMMENTS</b>
02.3	fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions	300	mg/kg		EC supports this provision.

<b>Recommendation 3 - Riboflavins, INS 101i, 101ii</b>					
The eWG recommends that the 39 <sup>th</sup> CCFA <b>adopt</b> the following food additive provisions for riboflavins in the GSFA.					
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC COMMENTS</b>
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	300	mg/kg	<b>Note 92</b> <sup>87</sup>	
<b>08.2</b>	<b>Processed meat, poultry, and game products in whole pieces or cuts</b>	<b>1000</b>	<b>mg/kg</b>		EC supports this provision. only with <b>note 16</b>
<b>08.3</b>	<b>Processed comminuted meat, poultry, and game products</b>	<b>1000</b>	<b>mg/kg</b>		EC supports this provision. only with <b>note 16</b>
<b>08.4</b>	<b>Edible casings (e.g., sausage casings)</b>	<b>1000</b>	<b>mg/kg</b>		EC supports this provision. only with <b>note 16</b>
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	<b>1000</b>	<b>mg/kg</b>	Note 95 <sup>88</sup>	EC supports this provision.
09.2.4.1	cooked fish and fish products	300	mg/kg	<b>Note 95</b>	EC supports this provision.
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	300	mg/kg		
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	mg/kg	<b>Note 95</b>	EC supports this provision.
14.1.3.2	vegetable nectar	300	mg/kg		EC doesn't support this provision and questions the technological need.
14.1.3.4	concentrates for vegetable nectar	300	mg/kg	<b>Note 127</b> <sup>89</sup>	EC doesn't support this provision and questions the technological need.

### SUNSET YELLOW FCF, INS 110

16. The 26<sup>th</sup> JECFA (1982) assigned a group ADI of 2.5 mg/kg bw/d for sunset yellow FCF.

<b>Recommendation 1 – Sunset Yellow FCF, INS 110</b>						
The eWG recommends that the 39 <sup>th</sup> CCFA <b>discontinue</b> further work on the following food additive provisions for sunset yellow FCF in the GSFA.						
<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments (Backup if needed)</b>	<b>Justification provided to eWG</b>

**The European Community agrees to discontinue work on the provisions under recommendation 1.**

<sup>87</sup> **Note 92:** Excluding tomato-based sauces

<sup>88</sup> **Note 95:** For use in surimi and fish roe products only.

<sup>89</sup> **Note 127:** As served to the consumer

**Recommendation 2 - Sunset Yellow FCF, INS 110**

The eWG recommends that the 39<sup>th</sup> CCFA adopt the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	EC Comments
01.1.2	dairy-based drinks, flavoured and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	50	mg/kg	Note 52 <sup>90</sup>	EC agree
01.6.1	unripened cheese	300	mg/kg	Note 3 <sup>91</sup>	EC oppose
01.6.2.2	rind of ripened cheese	100	mg/kg		EC agree
01.6.4.2	<b>Flavoured processed cheese, including containing fruit, vegetables, meat etc</b>	100	mg/kg		EC agree
01.6.5	cheese analogues	300	mg/kg	Note 3	EC agree
01.7	dairy-based desserts (e.g., pudding, fruit or flavoured yoghurt)	50	mg/kg		EC agree
02.1.3	lard, tallow, fish oil, and other animal fats	300	mg/kg		EC oppose as such use could mislead the consumer
02.4	fat-based desserts excluding dairy-based dessert products of food category 01.7	50	mg/kg		EC agree
03.0	edible ices, including sherbet and sorbet	50	mg/kg		EC agree
04.1.2.5	jams, jellies and marmelades	300	mg/kg		EC supports a level of 100 mg/kg (codex standard has a level of 200 mg/kg Eventually a footnote limiting to singly or in combination needs to be added.
04.1.2.6	fruit-based spreads (e.g., chutney) excluding products of food category 04.1.2.5	300	mg/kg		
04.1.2.7	candied fruit	200	mg/kg		EC agree
04.1.2.8	fruit preparations, including pulp, purees, fruit toppings and coconut milk	300	mg/kg		
04.1.2.9	fruit-based desserts, including fruit-flavoured water-based desserts	50	mg/kg		EC agree
04.1.2.11	fruit fillings for pastries	300	mg/kg		Support at 200 mg/kg
04.2.1.2	surface-treated fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds	300	mg/kg	Note 4 <sup>92</sup> &16	Glazes and coatings only
04.2.2.6	vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed pulps and preparations (e.g., vegetable desserts and sauces, candied vegetables) other than food category 04.2.2.5	50	mg/kg		
04.2.2.7	fermented vegetable	200	mg/kg	Note 92 <sup>93</sup>	

<sup>90</sup> **Note 52:** Excluding chocolate milk

<sup>91</sup> **Note 3:** Surface treatment.

<sup>92</sup> **Note 4:** For decoration, stamping, marking or branding the product.

**Recommendation 2 - Sunset Yellow FCF, INS 110**

The eWG recommends that the 39<sup>th</sup> CCFA adopt the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	EC Comments
	(including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed products, excluding fermented soybean products of food category 12.10				
05.1.5	imitation chocolate, chocolate substitute products	<b>300</b>	<b>mg/kg</b>		EC supports a level of 50 mg/kg because of intake considerations
05.2	confectionery including hard and soft candy, nougat, etc. other than food categories 05.1, 05.3 and 05.4	<b>300</b>	<b>mg/kg</b>		EC supports a level of 50 mg/kg because of intake considerations
05.3	chewing gum	300	mg/kg		EC supports a level of 50 mg/kg because of intake considerations
05.4	decorations (e.g., for fine bakery wares), toppings (non-fruit) and sweet sauces	<b>300</b>	<b>mg/kg</b>		EC support
06.3	breakfast cereals, including rolled oats	<b>300</b>	<b>mg/kg</b>		EC opposes
06.4.3	pre-cooked pastas and noodles and like products	300	mg/kg		EC does not agree with the use of colours in pre-cooked pastas. However, could agree with the use <u>in instant noodles only</u> , if this is in accordance with CODEX STAN 249-2006
06.5	cereal and starch based desserts (e.g., rice pudding, tapioca pudding)	<b>50</b>	<b>mg/kg</b>		EC Agree
07.0	bakery wares	<b>200</b>	<b>mg/kg</b>		EC opposes in wider category support in category 7.2 fine bakery wares only
08.1	fresh meat, poultry, and game	<b>300</b>	<b>mg/kg</b>	Notes 4 & 16 <sup>94</sup>	Glazes and coatings only
08.2	processed meat, poultry, and game products in whole pieces or cuts	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
08.3.1.1	cured (including salted) non-heat treated processed comminuted meat, poultry, and game products	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
08.3.1.2	cured (including salted) and dried non-heat treated processed comminuted meat, poultry, and game products	135	mg/kg		Glazes and coatings only add footnote
08.3.1.3	fermented non-heat treated processed comminuted meat, poultry, and game products	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
08.3.2	heat-treated processed comminuted meat, poultry, and game products	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
08.3.3	frozen processed comminuted meat, poultry, and game products	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only

<sup>93</sup> **Note 92:** Excluding tomato-based products

<sup>94</sup> **Note 16:** For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.

**Recommendation 2 - Sunset Yellow FCF, INS 110**

The eWG recommends that the 39<sup>th</sup> CCFA adopt the following food additive provisions for sunset yellow FCF in the GSFA.

<b>Food Cat No.</b>	<b>Food Category</b>	<b>Max</b>	<b>Level</b>	<b>Comments</b>	<b>EC Comments</b>
08.4	edible casings (e.g., sausage casings)	<b>300</b>	<b>mg/kg</b>	Note 16	EC agree
09.1.1	fresh fish	300	mg/kg	Notes 4, 16 & 50 <sup>95</sup>	Glazes and coatings only
09.1.2	fresh mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Notes 4 & 16	Glazes and coatings only
09.2.1	frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 95 <sup>96</sup>	Glazes and coatings only
09.2.2	frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
09.2.3	frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 16 & 95	Glazes and coatings only
09.2.4.1	cooked fish and fish products	<b>300</b>	<b>mg/kg</b>	Note 95	EC agree
09.2.4.2	cooked mollusks, crustaceans, and echinoderms	250	mg/kg		EC agree
09.2.4.3	fried fish and fish products, including mollusks, crustaceans, and echinoderms	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
09.2.5	smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	<b>100</b>	<b>mg/kg</b>	Note 22 <sup>97</sup>	EC agree
09.3.1	fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
09.3.2	fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	<b>300</b>	<b>mg/kg</b>	Note 16	Glazes and coatings only
09.3.3	salmon substitutes, caviar, and other fish roe products	<b>300</b>	<b>mg/kg</b>		Support
09.3.4	semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	<b>300</b>	<b>mg/kg</b>		Support at 100 mg/kg
09.4	fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and	<b>300</b>	<b>mg/kg</b>	Note 95	EC agree

<sup>95</sup> **Note 50:** For use in fish roe only.

<sup>96</sup> **Note 95:** For use in surimi and fish roe products only.

<sup>97</sup> **Note 22:** For use in smoked fish products only.

**Recommendation 2 - Sunset Yellow FCF, INS 110**

The eWG recommends that the 39<sup>th</sup> CCFA adopt the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	EC Comments
	echinoderms				
10.1	fresh eggs		GMP	Note 4 <sup>98</sup>	EC agrees
10.4	egg-based desserts (e.g., custard)	50	mg/kg		EC agrees
12.2.2	seasonings and condiments	300	mg/kg		EC agrees
12.4	mustards	300	mg/kg		EC agrees
12.5	soups and broths	50	mg/kg		EC agrees
12.6	sauces and like products	300	mg/kg		EC agrees although should not be used in tomato based sauces
12.9.5	other protein products	200	mg/kg		Support at 100 mg/kg
13.3	dietetic foods intended for special medical purposes (excluding products of food category 13.1)	50	mg/kg		EC agrees
13.4	dietetic formulae for slimming purposes and weight reduction	50	mg/kg		EC agrees
13.5	dietetic foods (e.g., supplementary foods for dietary use) excluding products of food categories 13.1 - 13.4 and 13.6	300	mg/kg		EC agrees
13.6	food supplements	300	mg/kg		EC agrees
14.2.2	cider and perry	200	mg/kg		EC agrees
14.2.4	wines (other than grape)	200	mg/kg		EC Agrees
14.2.6	distilled spirituous beverages containing more than 15% alcohol	200	mg/kg		EC agrees
14.2.7	aromatized alcoholic beverages (e.g., beer, wine and spirituous cooler-type beverages, low alcoholic refreshers)	200	mg/kg		EC agrees
15.1	snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)	200	mg/kg		EC agrees

**Recommendation 3 - Sunset Yellow FCF, INS 110**

**Comments are requested** on the following food additive provisions for sunset yellow FCF in the GSFA.

Food Cat No.	Food Category	Max	Level	Comments	EC comments
01.6.4.1	Plain processed cheese	200	mg/kg		
14.1.4.1	carbonated water-based flavoured drinks	300	mg/kg		EC considers the level of 50 ppm is appropriate because of intake considerations
14.1.4.2	non-carbonated water-based flavoured drinks, including punches and ades	300	mg/kg		EC considers the level of 50 ppm is appropriate because of intake considerations
14.1.4.3	concentrates (liquid or solid) for water-based flavoured drinks	391	mg/kg		EC considers the level of 300 ppm is appropriate because of intake considerations (assuming that this is based on a concentrate intended to be diluted 5:1)
16.0	composite foods - foods that could not be placed in categories 01 - 15	500	mg/kg		EC oppose – Foodstuffs should always be clearly defined

<sup>98</sup> **Note 4:** For decoration, stamping, marking or branding the product.

For the higher use levels proposed in categories 14.1.4.1 and 14.1.4.2 the EC notes that a 15kg child would have to consume the following volumes of soft drink coloured at the corresponding level to reach the ADI

<b>Colour level mg/l</b>	<b>Volume soft drink consumed to reach ADI</b>
<b>300</b>	<b>125ml</b>
<b>200</b>	<b>187.5ml</b>
<b>100</b>	<b>375ml</b>
<b>50</b>	<b>750ml</b>