

**European Community Position Paper for the  
CODEX COMMITTEE ON FOOD ADDITIVES  
AND CONTAMINANTS**

**Beijing, People's Republic of China, 20-24 March 2000**

**Agenda items 6, 7 and 8  
CX/FAC 00/5, CX/FAC 00/9, CL 1999/15 FAC**

The European Community has examined the documents concerning the preparation of the 32<sup>nd</sup> session of the Codex Committee on Food Additives and Contaminants (CCFAC) and, in particular, the documents:

- Agenda item 6: Endorsement and/or revision of maximum levels for food additives in Codex standards (CX/FAC 00/5)
- Agenda item 7: The Draft Codex General Standard for Food Additives Draft Tables 1, 2 and 3 (including Annex to Table 3) (CL 1999/15 FAC)
- Agenda item 8: Discussion paper on the Use of Colours in Foods (CX/FAC 00/9)

The European Community makes the following comments.

**Agenda item 6 - CX/FAC 00/5: Endorsement and/or revision of maximum levels for food additives in Codex standards**

Following the request of the 31<sup>st</sup> CCFAC, Canada has provided a technological justification for the use of pimaricin (natamycin, INS 235) in sliced, cut, shredded or grated cheese.

The European Community thinks that use of pimaricin should be as limited as possible due to its low acceptable daily intake (ADI 0-0.3 mg/kg) and its possible effects on resistance of moulds. Therefore, we oppose the use of natamycin in sliced, cut, shredded or grated cheese.

The conclusion of JECFA on the clinically significant microbial resistance or cross-resistance dates from 1976. Since then new information should exist either to contradict the conclusion or to support it. Therefore, we would propose that JECFA re-evaluate the safety of pimaricin.

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## **Agenda item 7 - CL 1999/15 FAC: The Draft Codex General Standard for Food Additives - Draft Tables 1, 2 and 3 (including Annex to Table 3)**

### **1. Table 1**

The European Community, in an earlier answer to the circular letter (CL 1999/15 FAC), made detailed comments on the proposed use of additives listed both in Table 1 and Appendix 1. In addition, we would like to make the following comments:

#### Provisions on Table 3 additives that may be used in foodstuffs listed in the Annex to Table 3

The 31<sup>st</sup> CCFAC decided to include in Table 1 and Table 2 provisions for the use of food additives listed in Table 3, in foods listed in the Annex to Table 3.

It is understandable that there is an intention to reduce the volume of the GSFA to a minimum, but, unfortunately, the outcome in this case is far from clear. Table 1 was, earlier, strictly for food additives with numerical ADIs. Now it also contains information on certain Table 3 additives. It is not immediately clear when the use of an additive in Table 1 is strictly limited to categories mentioned or whether the GMP-use in foodstuffs in general with certain exceptions is possible.

Therefore, we would recommend

either to list the uses of Table 3 additives only in Table 2, in which case under each food category it would be possible to see all the additives that can be used,

or to create a separate table where the use of additives listed in Table 3 is governed for the foodstuffs listed in the Annex to Table 3.

#### Sulphites

JECFA re-evaluated sulphites in its 51<sup>st</sup> meeting and reaffirmed the group ADI of 0.7 mg/kg bw. In addition, JECFA reiterated its earlier recommendation that, when a suitable alternative method of preservation exists, its use should be encouraged, particularly in those applications in which the use of sulphites may lead to high levels of acute exposure and which have most commonly been associated with life-threatening adverse reactions.

The European Community thinks that the current proposals for the use of sulphites in foodstuffs are too liberal and that any proposed use should be studied carefully, both as to the need for use and to the maximum levels allocated.

#### Pastas and noodles (category 6.4)

Many uses of colours and other food additives are proposed in the draft GSFA for dry and fresh pasta. However, the European Community would like to question the technological need for additives in these products. In the European Community, where the highest amount of pasta products is consumed per capita in the world, the use of additives is totally forbidden in dry pasta and the use of other additives in fresh pasta

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is very restricted. This is because all technological and sensorial needs can be fulfilled by using very few additives in fresh pasta and in the fillings of filled pasta.

To clarify the use of additives in dry and fresh pasta, we would like to propose the following change to the categorisation of pasta and noodles (Annex B of GSFA):

- 6.4. Pasta and noodles
  - 6.4.1. Pasta
    - 6.4.1.1. Dry pasta
    - 6.4.1.2. Fresh pasta
  - 6.4.2. Noodles

## Wine

In its 23<sup>rd</sup> session, Codex Alimentarius Commission decided to remove provisions for the use of certain food additives (alpha-amylase, dimethyl dicarbonate, polymethylsiloxane and polyvinylpyrrolidone) in wines. This was in view of the previous agreement of CCFAC to collaborate with the Office international de la vigne et du vin (OIV).

Therefore, we think that the technological justification for the use of food additives in wine should be in line with the OIV norms. Additives not needed for wine making should be removed from the GSFA.

## Work of the ad hoc working group

As regards the detailed evaluation of the proposed usage and maximum levels for additives in the form of an ad hoc working group (so-called quality control group), the European Community recommends that the work should be continued with those additives that have not been examined in this respect yet. However, this preparatory work does not in anyway replace the importance of devoting sufficient time for discussions on food additive provisions within the CCFAC.

## **2. Annex to Table 3**

The Annex to Table 3 lays down a list of foodstuffs that are considered to be basic foodstuffs consumed regularly by all age groups or especially by infants. Yeast (category 12.8) is currently included in the Annex. However, in yeast many additives listed in Table 3 are commonly used, such as ascorbic acid, carbon dioxide, nitrogen, and nitrous oxide. As yeast is merely an ingredient in bread, not a basic foodstuff, and without prejudice to the carry-over, we would like to propose that yeast is removed from the Annex to Table 3.

## **Agenda item 8 - CX/FAC 00/9 Discussion paper on the Use of Colours in Foods**

The European Community would like to thank Denmark for its efforts on revising the discussion paper on the use of colours in foods.

The European Community is of the opinion that the use of colours has to fulfil the criteria laid down in the Preamble, as for any other food additive. Special attention

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should be given to ensuring that the technological need for use does not result in the misleading of consumers on the freshness of products. Furthermore, colours should not be used in basic foodstuffs, such as unprocessed foodstuffs.

Most of the provisions for colours are contained in Table 1, as most colours have a numerical ADI. Therefore, it should be possible to verify that the allocated use of colours complies with all the principles for the use of an additive.

In Table 3 four colours are listed: beet red (INS 162), calcium carbonate (INS 170i), caramel colour class I (INS 150a) and titanium dioxide (INS 171). The use of these colours is already prohibited or limited in the foodstuffs listed in the Annex to Table three. Therefore, instead of creating a new negative list (option A in the document) just for foodstuffs in relation to the use of colours,

- either these colours should be removed from Table 3 altogether and transferred to Table 1, which would enable their permitted uses to be described more precisely in Table 1,
- or the Annex to Table 3 should be further developed.

In the discussion paper, several other options for further action are proposed. Option B suggests that CCFAC could adopt a policy that the use of colours in basic food and other foods that are consumed in large amounts should not be endorsed. We believe that CCFAC already has such a policy as any use of an additive can be endorsed only if it is safe. Foods that contain additives and are consumed in large amounts would be the ones to contribute most to the daily intake of additives, which would have to be within the limits of the acceptable daily intake of the additive.

As for the option E, it does not limit itself to colours but applies to all additives. Sulphites have already been recognised by JECFA to cause allergic reactions and, therefore, the Codex Committee on Food Labelling (CCFL) has endorsed special labelling rules for sulphites. So, before option F can be fulfilled, the information from JECFA should exist on this question in order for CCFL to consider it.

We could agree with the option D, that the Preamble should be extended with additional criteria to ensure that foodstuffs like those listed in Annex to Table 3 are not coloured and to ensure that consumers are not misled, but while elaborating such criteria it should be kept in mind that consumers can as well be misled by the use of other additives.

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