



**Food and Agriculture  
Organization of the  
United Nations**



**World Health  
Organization**

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

**Agenda Item 3(b)**

**CX/FA 17/49/4 add. 1**

February 2017

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Forty-ninth Session

Macao SAR, China, 20-24 March 2017

### PROPOSED DRAFT SPECIFICATIONS FOR THE IDENTITY AND PURITY OF FOOD ADDITIVES ARISING FROM THE 82ND JECFA MEETING

(Comments at Step 3)

Comments of Brazil, European Union and EFEMA

#### Brazil

Brazil supports reviewing the specifications designated as “Full” for the food additives listed in Annex 1 of CX/FA 17/49/4 and the recommendation of their adoption by the Commission as Codex Specifications.

#### European Union

**Recommendation to review the specifications designated as “Full” for the food additives listed in Annex 1 part a**

#### ***Food additives***

The EU would like to thank JECFA for preparing the draft specifications arising from the 82<sup>nd</sup> JECFA meeting. The EU supports the adoption of the specifications as drafted except for lutein esters from *Tagetes erecta* and pectins.

For lutein esters from *Tagetes erecta* (INS 161b (iii)) and pectins (INS 440) the EU noticed that the specifications contain references to secondary food additives (INS 161b (iii): “*Usually food grade antioxidants are added to stabilize the product*”; INS 440: “*Sulfur dioxide may be added as a preservative; pectins may be mixed with suitable food-grade buffer salts required for pH control*”).

The EU would like to remind that at the last CCFA session the decision how to address secondary additives was taken as follows: the Committee agreed to continue with the current practice to address the use of secondary additives by using notes within the current GSFA food category system (REP16/FA, para 136).

Therefore, the EU considers that the text which might be perceived as allowing the use of secondary additives via specifications is not appropriate and shall be removed.

#### ***Food flavourings***

The EU noticed that some substances have a FLAVIS number which is not included in the draft specifications. The EU suggests including the following FLAVIS numbers in the specifications:

JECFA No	Name of the substance	FLAVIS No
2216	9-Decen-2-one	07.262
2218	1,5-Octadien-3-ol	10.057
2230	2,5-Dimethyl-3(2H)-furanone	13.119
2231	2,5-Dimethyl-4-ethoxy-3(2H)-furanone	13.117
2123	Glutamyl-valyl-glycine	17.038

**European Food Emulsifiers Manufacturers Association (EFEMA)**

I am writing to you on behalf the European Food Emulsifier Manufacturers Association (EFEMA) with regard to the revision of the specifications for Citric and fatty acid esters of glycerol, also known as CITREM (INS 472c), and especially the maximum level established for lead in, when this food emulsifier is used for infant formula.

Indeed, we understand that at its 82<sup>nd</sup> meeting, the Joint FAO/WHO Expert Committee on Food Additives (JECFA)<sup>1</sup> established a specific maximum limit for lead of **0,5 mg/kg** when CITREM is used in infant formula. This is also reflected in the CX/FA 17/49/3<sup>2</sup> document on page 3, more precisely:

*“11. For the 82<sup>nd</sup> JECFA meeting, data were requested on the levels of lead present in CITREM, pectin and starch sodium octenyl succinate for use in infant formula, and data was received on levels of lead in CITREM and pectin, but not for starch sodium octenyl succinate. The 82<sup>nd</sup> JECFA evaluated the data presented for levels of lead in 12 non-consecutive lots of CITREM. The levels of lead were below 0.1 mg/kg, the limit of quantification of the method (inductively coupled plasma optical emission spectrometry), demonstrating that the lead level of 0.5 mg/kg proposed by the 79<sup>th</sup> JECFA was achievable for CITREM used in infant formula. **The current limit of 2 mg/kg for lead in the CITREM specifications monograph was maintained for general use, and a limit of 0.5 mg/kg was included for use in infant formula**”.*

However, we noted that the working document CX/FA 17/49/4 document<sup>3</sup> refers to the FAO JECFA MONOGRAPHS 19<sup>4</sup>, in which the specifications for CITREM (INS 472 c) read:

*“Lead (Vol. 4) Not more than 2 mg/kg. (**Not more than 0.1 mg/kg** for use in infant formula and formula for special medical purposes intended for infants)”.*

We would therefore suggest that the JECFA Monograph for CITREM (INS 472c) is slightly amended to indicate the specific maximum limit for lead of **“Not more than 0.5mg/kg for use in infant formula and formula for special medical purposes intended for infants”**.

---

<sup>1</sup> See <http://www.fao.org/3/a-bl839e.pdf>

<sup>2</sup> See [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-49%252FWD%252Ffa49\\_03e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-49%252FWD%252Ffa49_03e.pdf)

<sup>3</sup> See [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-49%252FWD%252Ffa49\\_04e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-711-49%252FWD%252Ffa49_04e.pdf)

<sup>4</sup> See <http://www.fao.org/documents/card/en/c/a6fe72dc-82fb-437c-81cc-bc4d739043a5/>