

## 2013 Electronic Working Group (e-WG) on the General Standard for Food Additives (GSFA)

### First Circular

1. The 45<sup>th</sup> Session of the Codex Committee on Food Additives (CCFA) agreed to establish an e-WG to develop:<sup>1</sup>
  - i) recommendations for the entry in the GSFA on proposals for new food additive provisions in food category 16.0 (Prepared foods);
  - ii) recommendations for the entry in the GSFA of new proposals and revision of existing provisions, contained in CX/FA 13/45/12 and in FA 45/CRDs 6 and 12, except for those provisions in food category 14.2.3 (Grape wines) and its sub-categories, and those provisions for aspartame (INS 951) and aspartame-acesulfame salts (INS 962);
  - iii) proposals for the provisions in Table 1 and 2 of the GSFA of Table 3 food additives with “acidity regulator” function, which were held at the 45<sup>th</sup> Session, for their use for technological function other than as acidity regulators; and
  - iv) Proposals for consideration of the provisions in Table 1 and 2 of Table 3 food additives with functions other than “emulsifier, thickener, stabilizer,” “colour,” and “sweetener”.

### **Points i) and ii): Proposals on New Provisions for Inclusion in, and Revision of Existing Provisions of, the GSFA**

#### Background:

2. The 44<sup>th</sup> CCFA forwarded a revised title and descriptor for food category 16.0 to the Codex Alimentarius Commission for adoption at Step 8.<sup>2</sup> As a result of this revision, the Committee also recommended revocation or discontinuation of all provisions currently in food category 16.0.<sup>3</sup> The 44<sup>th</sup> CCFA also issued a Circular Letter (CL 2012/5-FA, Part B, point 9) requesting proposals for new provisions for the use of food additives in this food category in order to populate food category 16.0 with provisions appropriate to the revised title and descriptor.<sup>4</sup>
3. The 44<sup>th</sup> CCFA issued a Circular Letter (CL 2012/5-FA, Part B, point 10) requesting proposals for new or revised provisions for the GSFA to be submitted according to the *Procedure for Consideration of the Entry and Review of Food Additive Provisions in the General Standard for Food Additives*.<sup>5</sup>
4. Due to time constraints, the 45<sup>th</sup> CCFA was unable to discuss the proposals for new provisions for inclusion in food category 16.0 nor the proposals for new additive provisions and revisions of existing provisions of the GSFA. As a result, the Committee agreed to request that the e-WG on the GSFA prepare recommendations for the entry of the new provisions and revision of the existing provisions of the GSFA.<sup>6</sup>

#### Working Document

5. The first circular for proposals on new provisions for and revision of existing provisions of the GSFA is presented in two parts. Part I contains proposals for new provisions for inclusion in the GSFA at Step 2, submitted in response to CL 2012/5-FA, Part B, points 9 and 10, as well as comments on those proposals.<sup>7</sup> Part II contains proposals for revision or revocation of existing provisions in the GSFA,

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<sup>1</sup> REP 12/FA para. 103.

<sup>2</sup> REP 12/FA para. 114 and Appendix X.

<sup>3</sup> REP 12/FA para. 114 and Appendix VII and VII.

<sup>4</sup> REP 12/FA, para. 115.

<sup>5</sup> REP 12/FA, para. 87.

<sup>6</sup> REP 12/FA, para. 100.

<sup>7</sup> CX/FA 13/45/11, CX/FA 13/45/12, FA/45 CRD 6, and FA/45 CRD 12.

submitted in response to CL 2012/5-FA, Part B, point 10.<sup>8</sup> Both parts are presented in the format of Table 1 of the GSFA (the information is presented alphabetically by food additive name).

### Request for Comments

6. For Part I of the working document, the e-WG is invited to comment on the inclusion of the new provisions in the GSFA at Step 2. These comments will be used by the physical working group (p-WG) on the GSFA to the 46<sup>th</sup> CCFA to formulate a recommendation to the Committee for inclusion into the GSFA at Step 2. Should the Committee agree with a recommendation for inclusion in the GSFA at Step 2, the provision will be maintained in the GSFA at Step 2 and circulated for full comment at Step 3 at a future date as the Committee's agenda permits. Should the Committee agree that insufficient information was provided to support inclusion of the provision into the GSFA at Step 2, the Committee will stop work on the proposed provision.

7. For Part II of the working document, the e-WG is invited to comment on the proposed revision of provisions currently in the Step process of the GSFA and revocation or revision of currently adopted provisions. These comments will be used by the p-WG to the 46<sup>th</sup> CCFA to formulate a recommendation to the Committee for inclusion in an Annex that will be maintained until such time that the Committee circulates the recommendation on the existing provision for comment. Should the Committee agree with inclusion of the recommendation in an Annex, the recommendation for revision or revocation will be maintained for consideration until the Committee circulates the provision for comment at a later date. Should the Committee agree that not enough information has been provided to support maintaining the proposal for revision or revocation, the Committee will stop work on the proposal.

8. In responding to Parts I and II, the e-WG should keep in mind the following:

- All comments should adhere to the *Procedures for consideration of entry and review of food additive provisions in the General Standard for Food Additives (GSFA)*<sup>9</sup>. In particular, comments should focus on whether information has been provided to fulfill the criteria for justifying the use of a food additive as described in Section 3.2 of the Preamble to the GSFA. Comments containing only a recommendation of inclusion or stop work with no justification will be given low priority.
- Please respond by adding your comments to the provided Word document, rather than as separate documents. Space has been designated in the working documents for e-WG members to provide comment. Please utilize the designated fields so that all responses will be organized in a similar manner. If more space is needed for your comment, please summarize your comment in the designated field and provide further detail as an attachment. This will allow ease of collation for the second circular.
- Please include all members of the e-WG on your e-mail transmitting your comments.

### **Points iii) and iv): Proposals for the Provisions in Table 1 and 2 of the GSFA of Table 3 Food Additives for their Use for Technological Function other than “acidity regulator”, “emulsifier, thickener, stabilizer,” “colour,” and “sweetener”.**

#### Background

9. The p-WG on the GSFA for the 45<sup>th</sup> CCFA reached consensus on the horizontal approach for the use of Table 3 additives with “acidity regulator” function in food categories listed in the Annex to Table 3 of the GSFA.<sup>10</sup> This p-WG then considered proposals for provisions for Table 3 additives with acidity regulator function in the context of this horizontal approach and recommended that when acidity regulators are not justified in a food category, provisions for Table 3 food additives with functions in addition to acidity regulator should be held at their current step in the GSFA.<sup>11</sup>

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<sup>8</sup> CX/FA 13/45/12, FA/45 CRD 6, and FA/45 CRD 12.

<sup>9</sup> Codex Procedural Manual, 21<sup>st</sup> Ed. (2013), Section II: Elaboration of Codex Standards and Related Texts, p. 55.

<sup>10</sup> FA45/CRD 2 Appendix IV.

<sup>11</sup> FA 45/CRD 2, Appendix VI.

10. The 45<sup>th</sup> CCFA agreed that the e-WG on the GSFA for the 46<sup>th</sup> CCFA should prepare proposals for provisions for Table 3 food additives with functions in addition to acidity regulator for their use for technological function other than as acidity regulators.<sup>1</sup> The 45<sup>th</sup> CCFA also tasked this e-WG to prepare proposals on the remaining provisions in Tables 1 and 2 of the GSFA for Table 3 additives, with the exception of those with the technological function “emulsifier, thickener, stabilizer” (which will be discussed by the p-WG for the 46<sup>th</sup> CCFA), and those with the technological function “colour” and “sweetener” (which will be affected by the discussion of the eWG on Note 161).<sup>1</sup>

### Working Documents

11. The first circular for proposals for the provisions in Table 1 and 2 of the GSFA of Table 3 food additives for their use for technological function other than “acidity regulator”, “emulsifier, thickener, stabilizer”, “colour”, and “sweetener” is presented in the format of the food categories listed in the Annex to Table 3. The hierarchical nature of the food category system is reflected by including subcategories affected by the listing of a parent food category in the Annex. Information on corresponding Codex commodity standards and the use of food additives in those commodity standards is provided for each food category.

12. To facilitate the discussion of the e-WG, initial proposals have been made for each provision (adopt, adopt with revision, discontinue, discontinue and move to subcategories as appropriate). In determining these initial recommendations priority was given to alignment with corresponding Codex commodity standards.

a) Consideration of provisions for specific additives with “emulsifier, thickener, stabilizer” function:

The e-WG on the GSFA for the 45<sup>th</sup> CCFA prepared recommendations for provisions in Tables 1 and 2 for food additives listed in Table 3 with “emulsifier, stabilizer, thickener” function.<sup>12</sup> The e-WG only considered provisions for those additives listed in Appendix X of Rep 11/FA. Due to time constraints, the p-WG on the GSFA for the 45<sup>th</sup> CCFA and the Committee were unable to discuss all of these recommendations. Therefore, the Committee agreed to request that p-WG on the GSFA for the 46<sup>th</sup> CCFA consider the remaining recommendations.<sup>13</sup> During compilation of the first circular for the current e-WG it was noted that provisions for several Table 3 additives with “emulsifier, stabilizer, thickener” function were not considered by the e-WG on the GSFA for the 45<sup>th</sup> CCFA as those additives were not listed in Appendix X of Rep 11/FA. The first circular recommends that these provisions be forwarded to the p-WG on the GSFA for the 46<sup>th</sup> CCFA for consideration during its discussion of Table 3 additives with “emulsifier, stabilizer, thickener” function.<sup>14</sup>

b) Consideration of provisions for specific additives for use as acidity regulators

The 45<sup>th</sup> CCFA reached decisions on the majority of provisions for the use of Table 3 additives as acidity regulators.<sup>15</sup> However, during compilation of the first circular for the current e-WG it was determined that several provisions for specific additives for use as acidity regulators were either not considered by the 45<sup>th</sup> Session of the CCFA, or the decision of the 45<sup>th</sup> CCFA was not consistent with existing Codex commodity standards. Recommendations for these provisions for the use of the additive as an acidity regulator have been compiled in the Appendix document to the first circular. Specifically:

-Subcategories of Food Category 09.2 (Processed fish and fish products, including mollusks, crustaceans, and echinoderms): The 45<sup>th</sup> CCFA reached consensus that, although the use of acidity regulators was not generally justified in food category 09.2, the use of acidity regulators in several of its subcategories is generally justified.<sup>10</sup> Due to the hierarchical nature of the food category system, the 45<sup>th</sup> CCFA then considered whether provisions for additives with acidity regulator function only from food category 09.2 should be adopted in the corresponding subcategories to food category 09.2 where acidity regulators were

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<sup>12</sup> CX/FA 13/45/7.

<sup>13</sup> REP 13/FA, para. 85

<sup>14</sup> REP 13/FA, para. 104

<sup>15</sup> REP 13/FA, paras. 69 – 74.

justified. The 45<sup>th</sup> CCFA also held provisions in food category 09.2 for additives with functional effects in addition to acidity regulator for consideration of these additional functional effects in the parent food category (09.2). As such, the use of these additives as acidity regulators in the corresponding subcategories to food category 09.2 was not considered by the 45<sup>th</sup> CCFA. Should the current e-WG determine that these additives with functional effects in addition to acidity regulator are not used for these additional function effects in either food category 09.2 or its subcategories, the use of these food additives as acidity regulators in the subcategories of food category 09.2 would still need to be considered. Recommendations for the use of these additives as acidity regulators in the subcategories of food category 09.2 have been compiled in the Appendix document to the first circular;

-Omission of Citric acid (INS 330) and Lactic acid, L-, D-, and DL- (INS 270) from Food Categories 13.1.1 (Infant formulae) and 13.1.3 (Formulae for special medical purposes for infants): The e-WG on the GSFA for the 45<sup>th</sup> CCFA noted that both citric acid and lactic acid are listed in the corresponding Codex commodity standards for food categories 13.1.1 and 13.1.3 and recommended that the provisions for these additives in those food categories currently in the Step process be forwarded for adoption at Step 8. However, these provisions were inadvertently omitted from the report of the p-WG and the 45<sup>th</sup> CCFA.<sup>16</sup> As such these provisions remain in the Step process of the GSFA. Both the first circular and the Appendix document to the first circular contains recommendations that these provisions be forwarded for adoption at Step 8.

- Error of comparison of Food Category 13.2 (Complementary foods for infants and young children) with corresponding Codex commodity standards (provisions for Sodium lactate (INS 325) and Tricalcium citrate (INS 333(iii)): The p-WG on the GSFA to the 45<sup>th</sup> CCFA attempted to align the provisions for acidity regulators in food category 13.2 with the corresponding commodity standards.<sup>17</sup> The 45<sup>th</sup> CCFA agreed with this alignment proposal, including the discontinuation of food additive provisions for sodium lactate and tricalcium citrate in food category 13.2.<sup>18</sup> During the compilation of this first circular it was noted that provisions for sodium lactate and tricalcium citrate are, in-fact, included in one of the commodity standards corresponding to food category 13.2. As such these provisions are included in the Appendix document to the first circular with a recommendation that they be adopted at Step 8 in the GSFA in accordance with the corresponding Codex commodity standard.

13. The following conventions were used to prepare the working documents:

- Subcategories not listed in the Annex to Table 3, but affected by the listing of the parent food category in the Annex to Table 3 are indicated by underlining the food category number of the affected subcategory.
- When the initial recommendation is that a food additive provision be moved from a parent food category to a subcategory, the original provision in the parent food category will be indicated with ~~strikethrough~~ font and the new provision in the subcategory will be in **bolded** font with no Step indicated in the "Step/Adopted" column
- Provisions for additives with “emulsifier, thickener, stabilizer” function are coded **green**.
- Provisions for additives with “acidity regulator” function where the initial recommendation (for the use of the additive as an acidity regulator) refers to the Appendix document are coded **red**.
- In the Appendix document, those provisions for sodium lactate and tricalcium citrate that are being reintroduced and are not in the Step process in the GSFA are indicated with **underlined and bolded** font with no Step indicated in the "Step/Adopted" column.

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<sup>16</sup> FA 45/CRD 2, Appendix I, Part B.

<sup>17</sup> REP 13/FA para. 72.

<sup>18</sup> REP 13/FA paras. 73-74.

## Request for Comments

14. The e-WG is invited to comment on the initial proposals presented in this first circular. Please provide comment and justification even if you agree with the initial proposal. Please keep the following in mind when providing comment:

- All comments should adhere to the *Procedures for consideration of entry and review of food additive provisions in the General Standard for Food Additives (GSFA)*<sup>9</sup>, in particular, in providing technological justification. Section 3.2 of the Preamble to the GSFA establishes the criteria for justifying the use of a food additive. Comments containing only a recommendation of adopt or discontinuation with no justification will be given low priority.
- Please respond by adding your comments to the Excel spreadsheets, rather than as separate documents. Space has been designated in the working documents for e-WG members to provide comment. Please utilize the designated fields so that all responses will be organized in a similar manner. If more space is needed for your comment, please summarize your comment in the designated field and provide further detail as an attachment. This will allow ease of collation for the second circular.
- Please include all members of the e-WG on your e-mail transmitting your comments.

## New Provisions for Inclusion in, and Revision of Existing Provisions of, the GSFA

This document includes New Proposals for Food Category 16.0 (Prepared foods) and New Proposals and Revision of Existing GSFA Provisions Included in CX/FA 13/45/12, and in FA 45/CRDs 6 and 12, except for those provisions in food category 14.2.3 (Grape wines) and its sub-categories, and those provisions for aspartame (INS 951) and aspartame-acesulfame salts (INS 962) <sup>[1]</sup>

### **PART I: New Proposals (including those for Food Category 16.0) for Inclusion in the GSFA at Step 2**

The following food additive provisions are **proposed for inclusion in the GSFA at Step 2**. If included in the GSFA at Step 2, the provision will be circulated for full comment at Step 3 at a future date as the CCFA agenda permits

Acetic and fatty acid esters of glycerol (INS 472a)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		EFEMA, IFAC: as thickener	

Acetylated distarch adipate (INS 1422)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		ICGMA: For use as thickener	
06.4.2	Dried pastas and noodles and like products	GMP		ICGMA: For use as thickener	

Acetylated distarch phosphate (INS 1414)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		ICGMA: For use as thickener	
06.4.2	Dried pastas and noodles and like products	GMP		ICGMA: For use as thickener	

Aluminium sulfate (INS 520)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>

Aluminium sulfate (INS 520)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
10.2.1	Liquid egg products	100	Note 6	<p><b>ICGMA:</b> As emulsifier - Protein Coagulation Suppressant (Crystallization inhibitor.) The aluminum binds with egg proteins to help maintain protein solubility during the pasteurization/heating process.</p> <p><b>Thailand:</b> The use of aluminium-containing food additives should be decreased. Therefore, Thailand proposes to <b>stop work on this draft provision.</b></p> <p><b>Indonesia:</b> Does not agree with this proposal. The use of aluminium-containing foods should be limited.</p>	
10.2.2	Frozen egg products	100	Note 6		

Note 6: As aluminium

Ammonium hydroxide (INS 527)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
04.1.1.2	Surface treated fresh fish	GMP		<p><b>Brazil:</b> Brazil agrees that the use of acidity regulators in this FC is generally not justified. However, INS 527 ammonium hydroxide is necessary for the surface treatment of fresh fruits. The use is concomitant with glazing agents, especially waxes, which there are several authorized for this subcategory. The technological function "carrier" could be added to INS 527. Brazil will make the proposal for addition of the function "carrier" to INS 527 within the INS eWG, and would like to propose its provision for food category 04.1.1.2 at the maximum use level of GMP.</p>	

Annatto extracts, bixin-based (INS 160b(i))					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
16.0	Prepared foods	200	Note 8	<p><b>ICGMA:</b> Restore yellow color to the prepared food. Color additives are used to standardize the color of the food product or to impart a yellow color to the food. Color for microwavable meal (e.g., beef ravioli in tomato and meat sauce; chicken and noodle composite food; chicken flavored rice and vegetable products; spinach and cheese ravioli).</p> <p><b>India:</b> Any food additive provisions in food category 16 need to be included in respect of the specific prepared food and not in general</p>	

Annatto extracts, bixin-based (INS 160b(i))					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
				<p>which, otherwise, would become permitted in all prepared foods. Therefore, we propose that the proposal for inclusion of annatto extracts in food category 16 be linked to the specific prepared foods for which they were proposed.</p> <p><b>African Union:</b> We support the proposed list of food additives for use in the prepared foods category and evaluation of the proposed MLs. We will consider MLs after JECFA has made evaluation and recommendations. More scientific data is needed to justify the proposed MLs.</p>	

Note 8: As bixin.

Annatto extracts, norbixin-based (INS 160b(ii))					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
16.0	Prepared foods	200	Note 185	<p><b>ICGMA:</b> Restore yellow color to the prepared food. Color additives are used to standardize the color of the food product or to impart a yellow color to the food. Color for microwavable meal (e.g., beef ravioli in tomato and meat sauce; chicken and noodle composite food; chicken flavored rice and vegetable products; spinach and cheese ravioli).</p> <p><b>India:</b> Any food additive provisions in food category 16 need to be included in respect of the specific prepared food and not in general which, otherwise, would become permitted in all prepared foods. Therefore, we propose that the proposal for inclusion of annatto extracts in food category 16 be linked to the specific prepared foods for which they were proposed.</p> <p><b>African Union:</b> We support the proposed list of food additives for use in the prepared foods category and evaluation of the proposed MLs. We will consider MLs after JECFA has made evaluation and recommendations. More scientific data is needed to justify the proposed MLs.</p>	

Note 185: As norbixin.

Brown HT (INS 155)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>



Brown HT (INS 155)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.4	Edible casings (e.g., sausage casings)	5000		<p><b>EU:</b> To deliver effective amount of colour. Used only in casings for particular sausages.</p> <p><b>Mali, African Union:</b> We support the establishment of MLs for food additives in line with Codex procedures. The ML for Brown HT (INS 155) of 5000 mg/kg for use in edible casings should be withheld. The wide use of additives in different food products should take into consideration the possibility that the [acceptable level of ingestion] (TDI) may be exceeded, particularly for vulnerable groups. The proposed ML for edible casings should take in consideration that the encased food may contain the same additive and therefore <b>the proposed ML for edible casings should be withheld</b> pending the conclusion of the food additive in food category 08.0 at step 7.</p> <p><b>Indonesia:</b> Does <b>not agree to use</b> the additive in food category 08.4.</p> <p>The GSFA currently contains a provision in food category 08.0 (Meat and meat products, including poultry and game) at 500 mg/kg, with Note 16 (“For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.”) at Step 7.</p>	

Calcium sulfate (INS 516)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
10.2.1	Liquid egg products	GMP		<b>ICGMA:</b> as thickener	

Carrageenan (INS 407)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
01.2.1.2	Fermented milks (plain), heat-treated after fermentation	GMP		<p><b>Marinalg:</b> For consistency with Codex Standard 243-2003</p> <p><b>Indonesia:</b> Agrees with the proposal.</p>	

Citric and fatty acid esters of glycerol (INS 472c)					

Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		EFEMA, IFAC: as thickener	

Dextrins, roasted starch (INS 1400)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.2	Dried pastas and noodles and like products	GMP		ICGMA: For use as thickener Indonesia: Agrees with the proposal.	
10.2.1	Liquid egg products	GMP		ICGMA: For use as thickener Indonesia: Agrees with the proposal.	
10.2.2	Frozen egg products	GMP		ICGMA: For use as thickener Indonesia: Agrees with the proposal.	

Distarch phosphate (INS 1412)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.1	Fresh meat, poultry, and game	GMP		ICGMA: Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.	

Hydroxypropyl distarch phosphate (INS 1442)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.1	Fresh meat, poultry, and game	GMP		ICGMA: Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.	

Lactic and fatty acid esters of glycerol (INS 472b)					
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Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		<b>EFEMA, IFAC:</b> For use as thickener	

<b>Lauric Arginate Ethyl Ester (INS 243)</b>					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.2.1	Non-heat treated processed meat, poultry, and game products in whole pieces or cuts	200		<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	
08.2.2	Heat-treated processed meat, poultry, and game products in whole pieces or cuts	200		<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	
08.3.1	Non-heat treated processed comminuted meat, poultry, and game products	200		<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	
08.3.2	Heat-treated processed comminuted meat, poultry, and game products	200		<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	

<b>Lecithin (INS 322(i))</b>					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
01.8.2	Dried whey and whey products, excluding whey cheese	30000		<p><b>IFAC:</b> Lecithin is currently widely used on whey protein concentrate and whey protein isolate for instantizing at a rate of 0.3-2.0%. The instantizing function of lecithin is required in this application to disperse the dried whey and to provide stabilizing and thickening properties.</p> <p><b>China:</b> Approved in China in 01.08 Other dairy products (such as whey powder and casein protein powder) at GMP. <b>Support adoption</b> of the provision.</p> <p><b>Indonesia:</b> <b>Agrees</b> with the proposal.</p>	

<b>Mono- and di-glycerides of fatty acids (INS 471)</b>					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
01.2.1.2	Fermented milks (plain), heat-treated after fermentation	GMP		<b>EFEMA:</b> For alignment with EU legislation and Codex Standard 243-2003. Emulsifiers are advantageous in	

Mono- and di-glycerides of fatty acids (INS 471)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
				<p>fermented dairy products for stabilization of the protein prior to heat treatment and optimization of viscosity, preventing physical spoilage during transport and storage, all while improving mouthfeel, cooking and baking stability.”</p> <p><b>China:</b> Approved in China in 01.02.01 (Fermented milk) with maximum usage level of 5 g/kg (5000 mg/kg). <b>Support adoption</b> of the provision.</p> <p><b>Indonesia:</b> Proposes a ML of <b>5000 mg/kg</b> because it is already sufficient for intended technological need.</p>	
10.2.1	Liquid egg products	GMP		<p><b>ICGMA:</b> For use as thickener</p> <p><b>China:</b> Approved in China in 10.03.04 (Liquid egg) at GMP. <b>Support adoption</b> of the provision.</p>	

Monostarch phosphate (INS 1410)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.1	Fresh meat, poultry, and game	GMP		<b>ICGMA:</b> Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.	

Neotame (INS 961)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
14.1.3.1	Fruit nectars	65		<p><b>CCC:</b> Improves taste without adding calories.</p> <p><b>ISA:</b> Products are typically heat-treated, and neotame has greater thermal stability, so that less sweetener is added later in the process.</p>	
14.1.3.3	Concentrates for fruit nectars	65		<p><b>CCC:</b> Improves taste without adding calories.</p> <p><b>ISA:</b> Products are typically heat-treated, and neotame has greater thermal stability, so that less sweetener is added later in the process.</p>	

Pectins (INS 440)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
14.1.2	Fruit and vegetable juices	3000		<p><b>Costa Rica, ICGMA:</b> used to thicken and adjust mouth feel and to stabilize</p> <p><b>China:</b> Approved in China in 14.02.01 (Fruit and vegetable juices and nectars) with maximum usage level of 3 g/kg (3000 mg/kg). <b>Support adoption</b> of the provision.</p> <p><b>Indonesia:</b> Proposes <b>GMP</b> for the ML of this additive.</p>	
14.1.3	Fruit and vegetable nectars	3000		<p><b>Costa Rica, ICGMA:</b> used to thicken and adjust mouth feel and to stabilize</p> <p><b>China:</b> Approved in China in 14.02.01 (Fruit and vegetable juices and nectars) with maximum usage level of 3 g/kg (3000 mg/kg). <b>Support adoption</b> of the provision.</p> <p><b>Indonesia:</b> Proposes <b>GMP</b> for the ML of this additive.</p>	

Phosphated distarch phosphate (INS 1413)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.1	Fresh meat, poultry, and game	GMP		<p><b>ICGMA:</b> Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.</p>	

Phosphates (INS 339(i), (ii), (iii); 340(i), (ii), (iii); 341(i), (ii), (iii); 342(i), (ii); 343(i), (ii), (iii); 450(i), (ii), (iii), (v), (vi); 451(i), (ii); 452(i), (ii), (iii), (iv), (v); 542)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
16.0	Prepared foods	2600	Notes 33 & AA	<p><b>ICGMA:</b> Sodium phosphate (Trisodium phosphate) is used as a protein stabilizer. It swells the proteins to give a mouth feel to mimic that of fat.</p> <p><b>India:</b> Any food additive provisions in food category 16 need to be included in respect of the specific prepared food and not in general which, otherwise, would become permitted in all prepared foods. Therefore, we propose that the proposal for inclusion</p>	

Phosphates (INS 339(i), (ii), (iii); 340(i), (ii), (iii); 341(i), (ii), (iii); 342(i), (ii); 343(i), (ii), (iii); 450(i), (ii), (iii), (v), (vi); 451(i), (ii); 452(i), (ii), (iii), (iv), (v); 542)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
				<p>of phosphates in food category 16 be linked to the specific prepared foods for which they were proposed.</p> <p><b>African Union:</b> We support the proposed list of food additives for use in the prepared foods category and evaluation of the proposed MLs. We will consider MLs after JECFA has made evaluation and recommendations. More scientific data is needed to justify the proposed MLs.</p>	

**Note 33:** As phosphorus.

**Note AA:** INS 339(iii) (trisodium phosphate) only, for use as a stabilizer.

Starches, enzyme treated (INS 1405)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.1	Fresh meat, poultry, and game	GMP		<b>ICGMA:</b> Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.	

Starch acetate (INS 1420)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
06.4.1	Fresh pastas and noodles and like products	GMP		<b>ICGMA:</b> For use as thickener	
06.4.2	Dried pastas and noodles and like products	GMP		<b>ICGMA:</b> For use as thickener	
08.1	Fresh meat, poultry, and game	GMP		<b>ICGMA:</b> Modified food starches are used as thickeners with fresh meats to manage texture (thickener), in injected and tumbled poultry, and in sausage-type products.	

Starch sodium octenyl succinate (INS 1450)					

Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
10.2.1	Liquid egg products	GMP		<b>ICGMA:</b> For use as thickener	
10.2.2	Frozen egg products	GMP		<b>ICGMA:</b> For use as thickener	
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	GMP		<b>ICGMA:</b> For use as thickener	

**Tartrates (INS 334; 335(i), (ii); 336(i), (ii); 337)**

Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
16.0	Prepared foods	200	Notes 45 & BB	<p><b>ICGMA:</b> L(+)-tartaric acid is used as a flavour synergist (e.g., in the microwavable meal “beef steak and peppers”) where it has a flavour softening effect in products that might use salt/sodium substitutes which could impart harsh notes.</p> <p><b>India:</b> Any food additive provisions in food category 16 need to be included in respect of the specific prepared food and not in general which, otherwise, would become permitted in all prepared foods. Therefore, we propose that the proposal for inclusion of tartrates in food category 16 be linked to the specific prepared foods for which they were proposed.</p> <p><b>African Union:</b> We support the proposed list of food additives for use in the prepared foods category and evaluation of the proposed MLs. We will consider MLs after JECFA has made evaluation and recommendations. More scientific data is needed to justify the proposed MLs.</p>	

**Note 45:** As tartaric acid.

**Note BB:** INS 334 (L(+)-tartaric acid) only, for use as a flavour synergist.

**Tartrazine (INS 102)**

Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
08.4	Edible casings (e.g., sausage casings)	300		<p><b>EU:</b> To deliver effective amount of colour. Used only in casings for particular sausages.</p> <p><b>Mali, African Union:</b> We support the establishment of MLs for food additives in line with Codex procedures. The ML for Tartrazine (INS 012) at 300 mg/kg for use in edible casings should be withheld. The wide use of additives in different food products should take into consideration the possibility that the [acceptable level of</p>	

Tartrazine (INS 102)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
				<p>ingestion] (TDI) may be exceeded, particularly for vulnerable groups. The proposed ML for edible casings should take in consideration that the encased food may contain the same additive and therefore <b>the proposed ML for edible casings should be withheld</b> pending the conclusion of the food additive in food category 08.0 at step 7.</p> <p>The GSFA currently contains a provision in food category 08.0 (Meat and meat products, including poultry and game) at 500 mg/kg, with Note 4 (“For decoration, stamping, marking or branding the product.”) and Note 16 (“For use in glaze, coatings or decorations for fruit, vegetables, meat or fish.”) at Step 7.</p>	

Xanthan gum (INS 415)					
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Comment Summary	eWG Comment: Has enough information been provided to support entry into the GSFA at Step 2? <sup>[2]</sup>
14.1.2	Fruit and vegetable juices	3000		<p><b>Costa Rica, ICGMA:</b> Used to thicken and adjust mouth feel and to stabilize</p> <p><b>China:</b> Approved in China in 14.02.01 (Fruit and vegetable juices and nectars) at GMP. <b>Support adoption</b> of the provision.</p>	
14.1.3	Fruit and vegetable nectars	3000		<p><b>Costa Rica, ICGMA:</b> Used to thicken and adjust mouth feel and to stabilize</p> <p><b>China:</b> Approved in China in 14.02.01 (Fruit and vegetable juices and nectars) at GMP. <b>Support adoption</b> of the provision.</p>	



## **PART II: Revision of Existing GSFA Provisions**

Revisions to existing provisions in the GSFA are noted as follows: deletions are denoted by ~~strike through~~ font, and additions or changes are noted in **bold** font.

The following **revisions to food additive provisions currently in the GSFA are proposed**. These revisions will **NOT** be included in the GSFA at this time, but will be maintained and updated each year in an Annex to the eWG Report for information purposes. The revised provisions will be circulated for full comment at a future date as the CCFA agenda permits.

<b>Ascorbyl Esters (INS 304, 305)</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
13.2	Complementary foods for infants and young children	<del>400</del> <b>200</b>	Notes 10, 15 & <b>ZZ</b>	Adopted 2010	<b>Brazil:</b> INS 304 only for conformity with CODEX STAN 74-1981. Increases adopted ML of 200 mg/kg. <b>Indonesia:</b> <b>Agrees</b> with new ML and Note <b>ZZ</b> .	

**Note 10:** As ascorbyl stearate.

**Note 15:** Fat or oil basis.

**Note ZZ:** INS 304 (ascorbyl palmitate only).

<b>Calcium Hydroxide (INS 526)</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed <u>REVOCATION</u> should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
<del>02.2.1</del>	<del>Butter</del>	<del>GMP</del>		Adopted 2008	<b>EU:</b> <b>Revoke</b> . No technological justification for use of acidity regulators in butter.	

<b>Carmines (INS 120)</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
08.4	Edible casings (e.g.,	<del>500</del>	Note 16	Adopted	<b>EU:</b> Increase ML. To deliver effective amount of	

Carmines (INS 120)						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
	sausage casings)	<b>10000</b>		2005	colour. Used only in casings for particular sausages. <b>Indonesia:</b> Proposes a ML of <b>2000 mg/kg</b> for category 08.4. Exposure with ML of 2000 mg/kg in children is < 50% (ADI 5 mg/kg bw).	

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

Carotenoids (INS 160a(i), 160a(iii), 160e, 160f)						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
08.4	Edible casings (e.g., sausage casings)	<del>100</del> <b>10000</b>		Adopted 2011	<b>EU:</b> Increase ML. To deliver effective amount of colour. Used only in casings for particular sausages. <b>Indonesia:</b> Proposes a ML of <b>2000 mg/kg</b> for category 08.4. Exposure with ML of 2000 mg/kg in children is < 50% (ADI 5 mg/kg bw).	

Curcumin (INS 100(i))						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
08.4	Edible casings (e.g., sausage casings)	<del>500</del> <b>2000</b>	Note 16	7	<b>EU:</b> To deliver effective amount of colour. Used only in casings for particular sausages. <b>Indonesia:</b> Proposes a ML of <b>1000 mg/kg</b> for category 08.4. Exposure with ML of 1000 mg/kg in children is < 50% (ADI 5 mg/kg bw).	

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

<b>Iron Oxides (INS 172(i), (ii), (iii))</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
08.4	Edible casings (e.g., sausage casings)	<del>1000</del> <b>5000</b>	Note 72	Adopted 2005	<b>EU:</b> Increase ML. To deliver effective amount of colour. Used only in casings for particular sausages.	

**Note 72:** Ready-to-eat basis.

<b>Lauric Arginate Ethyl Ester (INS 243)</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
08.2.3	Frozen processed meat, poultry, and game products in whole pieces or cuts	200	<del>Note 3</del>	3	<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	
08.3.3	Frozen processed comminuted meat, poultry, and game products	200	<del>Note 3</del>	3	<b>USA:</b> Inhibits growth of microorganisms in processed meat and poultry products.	

**Note 3:** Surface treatment.

<b>Pectins (INS 440)</b>						
<b>Food Category No.</b>	<b>Food or Food Category</b>	<b>Max Level (mg/kg)</b>	<b>Notes</b>	<b>Step</b>	<b>Comment Summary</b>	<b>eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup></b>
<b>01.2</b>	<b>Fermented and renneted milk products (plain), excluding food category 01.1.2 (dairy-based drinks)</b>	<b>GMP</b>			<b>IFAC:</b> Pectins are approved at GMP in all sub-categories. <b>China:</b> Approved in China in 01.02.01 (Fermented milk) at GMP. <b>Support adoption</b> of the provision. <b>Indonesia:</b> Agrees with the proposal.	
01.2.1.1	<del>Fermented milks (plain), not heat-treated after fermentation</del>	GMP	<del>Notes 234 &amp; 235</del>	Adopted 2013		
01.2.1.2	<del>Fermented milks (plain), heat-treated after fermentation</del>	GMP	<del>Note 234</del>	Adopted 2013		
01.2.2	Renneted milk (plain)	GMP		Adopted 2013		

**Note 234:** For use as stabilizer or thickener only.

**Note 235:** Use restricted to reconstitution and recombination only.

Sodium Carbonate (INS 500(i))						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
02.2.1	Butter	GMP	<b>Note CC</b>	Adopted 2008	<p><b>EU:</b> No technological justification for use of acidity regulators in butter. Sodium carbonates may be used to stabilize pH of specific products (e.g., soured cream butter).</p> <p><b>Indonesia:</b> Agrees with the proposed note.</p>	

**Note CC:** Use as a pH stabilizer in soured cream butter only.

Sodium Hydrogen Carbonate (INS 500(ii))						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
02.2.1	Butter	GMP	<b>Note CC</b>	Adopted 2008	<p><b>EU:</b> No technological justification for use of acidity regulators in butter. Sodium carbonates may be used to stabilize pH of specific products (e.g., soured cream butter).</p>	

**Note CC:** Use as a pH stabilizer in soured cream butter only.

Sodium Hydroxide (INS 524)						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed <b>REVOCATION</b> should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
<del>02.2.1</del>	<del>Butter</del>	<del>GMP</del>		Adopted 2008	<p><b>EU:</b> <b>Revoke.</b> No technological justification for use of acidity regulators in butter.</p> <p><b>Indonesia:</b> <b>Does not agree to revoke</b> the use of this additive in category 02.2.1 because the additive is still needed by the industry.</p>	

Sorbates (INS 200, 201, 202, 203)						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
08.4	Edible casings (e.g., sausage casings)	<del>200</del> 10000	Notes 42 & <del>222</del> 222REV	7	<b>EU:</b> Increase ML. Potassium sorbate (INS 202) only is used to prevent mold growth on the casing; no function in the final sausage.	

**Note 42:** As sorbic acid

**Note 222:** For use in collagen-based casings with a water activity greater than 0.6 only.

**Note 222REV:** INS 202 (Potassium sorbate) only for use in collagen-based casings with a water activity greater than 0.6 only.

Sucralose (Trichlorogalactosucrose) (INS 955)						
Food Category No.	Food or Food Category	Max Level (mg/kg)	Notes	Step	Comment Summary	eWG Comment: Does the eWG agree that the proposed revision should be maintained in an Annex to the eWG Report for circulation for comment at a later date? <sup>[3]</sup>
01.5.2	Milk and cream powder analogues	<del>400</del> 580		3	<b>CCC: 580 mg/kg.</b> Sweetens without added carbohydrates and calories. Added carbohydrates may result in browning reactions that impair the appearance of the product. Intense sweeteners may be used in this food category. ML based on Japanese standard.  <b>ISA: 400 mg/kg.</b> Sweetens without added carbohydrates and calories. Added carbohydrates may result in browning reactions that impair the appearance of the product. Intense sweeteners may be used in this food category.	

<sup>[1]</sup> Also excludes provisions for nisin (INS 234) contained in FA 45/CRDs 6 and 12. The 45<sup>th</sup> CCFA noted that nisin was to be re-evaluated by the 77<sup>th</sup> JECFA, agreed to postpone consideration of new proposals for the use of nisin in food category 08.0 (Meat and meat products, including poultry and game) and its sub-categories until the 46<sup>th</sup> Session in order to take the JECFA report into account (REP 13/FA, para. 99).

<sup>[2]</sup> If so, the provision will be circulated for full comment at Step 3 at a future date as the CCFA agenda permits.

<sup>[3]</sup> These revisions will **NOT** be included in the GSFA at this time, but will be maintained and updated each year in an Annex to the eWG Report for information purposes. The revised provisions will be circulated for full comment at a future date as the CCFA agenda permits.

