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Statement on Codex GSFA

IACM is the trade association that represents the manufacturers and end-users of coloring substances that are used in foods, including natural and synthetic colors. IACM participates as a nongovernmental observer at the Codex Alimentarius Commission, particularly at the Codex Committee on Food Additives (CCFA), which considers colors for inclusion in the General Standard of Food Additives (GSFA).

IACM appreciates and supports that many developing countries, as well as countries that are revising their food law, look to Codex standards for guidance. However, the Codex process is very deliberate, and as such, not all additives, including many colors that are approved in countries such as the US and the EU have made it through the Codex step process for inclusion in the GSFA. Additionally, it was not the intent of the creators of the GSFA for it to be adopted as a positive list at this stage of development. Footnote 1 of the GSFA states,

Notwithstanding the provisions of this Section of the General Standard, the lack of reference to a particular additive or to a particular use of an additive in a food in the General Standard as currently drafted, does not imply that the additive is unsafe or unsuitable for use in food. The Commission shall review the necessity for maintaining this footnote on a regular basis, with a view to its deletion once the General Standard is substantially complete.¹

Since their current omission from the GSFA is not due to safety concerns, but instead due to the large number of additives waiting for completion of the step process, IACM encourage countries to consider color approvals beyond those in the Codex GSFA when developing and amending its color regulations. However, it has recently been trending that countries, in developing or revising their food law, are considering the tables of the GSFA (only adopted additives) as a positive list. This trend has IACM extremely concerned, particularly because it is resulting in what is essentially a ban on some color additives that are widely approved and commonly used on a global basis.

There are currently 46 colors with draft and/or adopted provisions in the GSFA and a total of 1,895 draft and adopted provisions for colors in the GSFA. Those colors that have not completed the Step process for adoption are largely at Steps 4 and 7. Provisions at Step 4 are indicative that the draft text for the provision has been prepared, circulated to member countries and all interested parties for comment. The draft and the comments are awaiting review at the Committee level before being sent to the Commission for review. However, Step 7 additives have already been endorsed by the Commission and agreed to be put forth for finalization and are simply awaiting finalization by the Committee.

IACM asserts that there is no reason for a country to disallow the use of a color or a use already approved due its position at Step 7 (awaiting finalization) rather than Step 8 (adopted).

¹ CODEX STAN 192-1995

Color Additives with Provisions at Step 4 and/or 7 – Pending Adoption in GSFA²

Color	INS	# of Provisions at Step 4	# of Provisions at Step 7	Adopted Provisions	US Approved	EU Approved
Amaranth	123	2	39	0	N	Y
Annatto Extracts, Bixin-based	160b(i)	93	0	1	Y	Y
Annatto Extracts, Norbixin-based	160b(ii)	92	0	0	Y	Y
Azorubine (Carmoisine)	122	3	57	1	N	Y
Brilliant Black (Black PN)	151	0	59	0	N	Y
Brown HT	155	0	59	0	N	Y
Caramel II – Sulfite Caramel	150b	52	0	0	Y	Y
Curcumin	100(i)	17	69	1	Y	Y
Lutein from Tagetes Erecta	161b(i)	43	0	0	N	Y
Ponceau 4R	124	0	1	49	N	Y
Quinoline Yellow	104	0	58	1	N	Y
Tartrazine	102	8	64	1	Y	Y

*List does not include Table 3 color additives or those colors not approved in either the EU or US

² Full list of pending provisions prepared for and available as an Information Document at each CCFA meeting. Most recent version available:
ftp://ftp.fao.org/codex/meetings/ccfa/ccfa48/fa48_info_01_table1e.pdf.