

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Items 4a, 4b, 5a, 5b, 6, 7, 8, and 9**

**FA55/CRD30**

**Original Language Only**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD ADDITIVES

#### Fifty-Fifth Session

#### COMMENTS OF International Union of Food Science and Technology(IUFoST<sup>1</sup>)

The objective of this Conference Room Document (CRD) is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on priority agenda **items** of the 55<sup>th</sup> Session of the Codex Committee on Food Additives (CCFA55).

These comments were prepared by the Group of Experts of the [Global Food Regulatory Science Society \(GForSS\)](#), the Disciplinary Group of the [International Union of Food Science and Technology \(IUFoST\)](#).

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, made of over 300,000 scientists from more than 100 countries.

#### Agenda item 4a

IUFoST appreciates the Codex Secretariat's efforts and strongly supports aligning food additive provisions across Codex standards for clarity, consistency, and scientific rigor. Given that the current drafts of the regional standard for Castilla Lulo (naranjilla) and the standard for fresh curry leaves prohibit the use of additives, IUFoST urges CCFA55 to finalize their endorsement to prevent further delays at CAC48.

IUFoST further supports the structured approach for integrating regional/commodity standards into the Codex framework to ensure alignment with international best practices. The endorsement process is essential to ensuring the standard is scientifically sound, internationally harmonized, and widely accepted. A timely resolution at CCFA55 will facilitate adoption at Step 5/8 during CAC48, strengthening food safety, regulatory coherence, and facilitating trade.

#### Agenda item 4b

IUFoST acknowledges the progress made by the Electronic Working Group (EWG) in aligning food additive provisions across Codex standards. IUFoST supports the continued effort to align regional/commodity standards with the GSFA to ensure regulatory clarity and consistency.

IUFoST emphasizes the importance of addressing unresolved issues, such as the classification of mixed zaatar, sulfite use in dried ginger, and the harmonization of herbs and spices in Table 3 of the GSFA. Ensuring clear and scientifically justified alignment will prevent regulatory ambiguities and facilitate global trade.

IUFoST supports the recommendation to refine the categorization of food additives, the update to notes included in the GSFA, and to enhance coordination among Codex committees.

#### Agenda item 5a

IUFoST would like to thank the Electronic Working Group on the GSFA and supports a systematic, science-based approach to food additive regulation. IUFoST supports the revisions proposed, such as those for paprika extract (INS 160c (ii)), annatto extracts (INS 160b (i)), and aspartame (INS 951).

#### Agenda item 5b

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<sup>1</sup> This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GForSS), the Disciplinary Group of the International Union of Food Science and Technology (IUFoST) and was reviewed and endorsed by the Codex Committee of IUFoST.

IUFoST supports reviewing new and revised food additive provisions based on technological need and safety assessments. IUFoST suggests that further verification by the Committee and member countries is necessary to assess the impact of these provisions. Evaluations should ensure alignment with Codex standards, clarify permitted usage, and enhance regulatory consistency and transparency.

#### **Agenda item 6**

IUFoST would like to thank the Electronic Working Group, chaired by Belgium and co-chaired by Iran, for preparing the document.

IUFoST supports:

- Adding “Jagua blue” as a synonym for INS 183 for improved clarity.
- Removing ortho-phenylphenol (INS 231) and sodium ortho-phenylphenol (INS 232) due to discontinued use.
- Including oxidized polyethylene wax (INS 914) as a glazing agent, aligning with global practices.
- Updating the classification of carob bean gum (INS 410) and lecithin (INS 322(i)) to reflect their technological function.
- A phased approach to deleting azodicarbonamide (INS 927a) to allow regulatory transition.

IUFoST encourages continuous updates to the INS framework to reflect scientific advancements, ensuring transparency and regulatory coherence in food additive classification.

#### **Agenda item 7**

IUFoST recognizes the increasing limitations on resources relative to JECFA’s workload and urges CCFA to prioritize ensuring the availability of new data before a food additive is considered for JECFA evaluation or re-evaluation.

IUFoST notes that some chemical substances that are part of the composition of food packaging materials, and that warrant attention from the perspective of food safety and regulatory coherence, do not have a clear “home” within the Codex procedure:

For example, recent assessments by food safety agencies related to a substance such as Bisphenol A, included in food packaging applications, reveal possible discrepancies in the risk assessment outcomes<sup>2</sup> leading to possible divergent food regulatory decisions, that may impact food trade and create confusion in consumers’ understanding as to the safety of food packaging applications.

IUFoST suggests that a possible international evaluation of this substance, under the auspices of the Joint Expert Committee on Food Additives (JECFA) or a dedicated Expert Consultation led by FAO/WHO, be considered, to enable the reliance upon advice offering a global perspective. IUFoST suggests considering this substance as part of the priority list for JECFA evaluation or as part of the relevant international risk assessment approach.

#### **Agenda item 8**

IUFoST would like to thank China, France, Japan, Türkiye, and the Confederation of European Yeast Producers for their efforts in preparing the draft standard for Baker’s Yeast and supports its development to harmonize global regulations, enhance food safety, and facilitate fair trade.

IUFoST also highlights the need for coordination with the International Organization for Standardization (ISO) to prevent duplication of efforts and ensure complementary regulatory approaches. A structured engagement with technical committees, including the Codex Committee on Contaminants in Foods (CCCF) and the Codex Committee on Food Hygiene (CCFH), will be critical to addressing safety concerns and ensuring a comprehensive standard.

#### **Agenda item 9**

IUFoST recognizes the importance of strengthening the General Standard for Food Additives (GSFA) as the primary reference for food additive provisions in Codex. The discussion paper highlights persistent misalignments

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<sup>2</sup> EFSA evaluation suggesting lowering the TDI to 0.2 ng/kgbw/day – with possible dissenting opinions from other European risk assessment agencies e.g., BFR and UK FSA.

between the GSFA and commodity standards, emphasizing the need for improved coordination between Codex committees.

IUFoST supports efforts to minimize such divergence by ensuring that new food additive provisions developed by Commodity or Regional Committees are incorporated into the GSFA without delay. A proactive engagement plan is needed to facilitate early collaboration and prevent inconsistencies.

IUFoST endorses a structured approach, balancing the expertise of Commodity Committees with CCFA's technical oversight to maintain scientific coherence and regulatory alignment. A **hybrid model** integrating both approaches may help achieve this goal:

- › **Initial Drafting by Commodity Committees:** Commodity Committees develop additive provisions based on their sector expertise and industry-specific requirements. This ensures that the unique technical, cultural, and market-specific factors of each commodity are considered from the outset.
- › **Early Collaboration with CCFA Experts:** CCFA and GSFA experts provide technical oversight during the drafting phase, ensuring alignment with the GSFA and Codex standards while minimizing regulatory inconsistencies.
- › **CCFA Final Review and Endorsement:** Once the draft provisions are complete, CCFA reviews and endorses them, ensuring compliance with the GSFA framework and Codex procedural guidelines.
- › **Final Endorsement and Adoption by CAC:** Once fully endorsed by the CCFA, the GSFA amendments and the finalized commodity standards are adopted by CAC.

This hybrid approach combines the specialized knowledge of commodity committees with CCFA's technical expertise, ensuring both efficiency and regulatory consistency while maintaining the integrity of Codex standards and procedures.