

Report of the U.S. Delegate
54th Session of the Codex Committee on Food Additives (CCFA54)
Chengdu, China
April 22-26, 2024

The 54th Session of the Codex Committee on Food Additives (CCFA54) met in Chengdu, People's Republic of China, from April 22-26, 2024. The meeting was chaired by Dr. Yongxiang Fan of the Chinese National Center for Food Safety Risk Assessment and attended by 41 member countries; one member organization (the European Union, EU); representatives of 23 international observer organizations; the UN Food and Agriculture Organization (FAO); and the World Health Organization (WHO).

The United States Delegation was led by Dr. Daniel Folmer (Head of Delegation), U.S. Food and Drug Administration, Center for Food Safety and Applied Nutrition (FDA/CSFAN), assisted by alternate delegate Dr. LaShonda T. Cureton (FDA/CFSAN) and four other delegation members from the U.S. government.

NEXT SESSION

The next session of CCFA is tentatively scheduled to take place March 24-28, 2025, with final arrangements subject to confirmation by the host government (China) with the Codex Secretariat.

HIGHLIGHTS

CCFA54 was a highly productive session, with the United States taking the lead on the working group for the *General Standard for Food Additives* (GSFA, CXS 192-1995), which serves as the backbone for the work accomplished by the Committee. CCFA54 forwarded over 500 new and revised food additive provisions for final adoption by the 47th Session of the Codex Alimentarius Commission (CAC47, November 2024), including 21 new provisions for the food additive submitted by Colombia, jagua (genipin-glycine) blue, the first natural blue food color derived from the jagua tree native to southern America and developed in line with the Convention on Biological Diversity protocols and in collaboration with indigenous groups. CCFA54 also advanced several provisions submitted by Senegal for the additive methacrylate copolymer, basic (BMC).

CCFA is close to completing the all the provisions for sweeteners in the GSFA and advanced for final adoption by CAC46 six provisions for the use of sweeteners in bread, and as well as other food additive provisions for food categories related to wine, fermented dairy products, frozen and fried fish products, seasonings and herbs, soups, snacks, and dietetic foods, among other food categories. Additionally, CCFA54 significantly advanced work on numerous provisions for colors and is on track to finish work on all remaining color provisions by CCFA56 (2026).

A more detailed summary of the meeting is presented below. The official report of the 54th Session of CCFA can be found at the following link: <https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCFA&session=54>.

MEETING SUMMARY

Agenda Item 2: Matters Referred by the Codex Alimentarius Commission And Other Subsidiary Bodies

To Be Presented for Adoption at Next CAC? Yes

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

Half of the matters referred were for information only. With respect to the matters for action, the U.S. objective was to address questions from other Codex bodies consistent with the GSFA and the decisions reached by previous sessions, particularly CCFA53 (2023).

Discussion in Relation to United States' Objectives

Matters from the 11th session for the FAO/WHO Coordinating Committee for the Near East (CCNE11):

CCNE completed the *Regional Standard for Mixed Zaatar* (Near East) (CXS 341R-2020) and proposed a change in the GSFA food category, indicating that these products were classified as herbs. The EU suggested that the products conforming to CXS 341R-2020 might be more appropriately covered under food category 12.2.2 "Seasonings and condiments" since most of the ingredients do not contain herbs.

Matters from CCFA53 (2023):

CCFA53 had requested that the Secretariat review existing Codex standards considering the decisions taken with respect to riboflavins and beta-carotenes and prepare a document proposing conforming and consequential changes for consideration at CCFA54.

Matters from the 28th Session of the Codex Committee On Fats And Oils (CCFO28):

In response to questions from CCFA, CCFO28 informed CCFA54 that there was no technical justification for the use of chlorophylls in products under the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) and paprika extract in products under the *Standard for Fat Spreads and Blended Spreads* (CXS 256-2007). The European Union noted that, prior to alignment with the GSFA, the *Standard for Edible Fats and Oils not Covered by Individual Standards* (CXS 19-1981) did not allow the use of colors, and proposed that this prohibition be re-instated.

Other Notes:

The EU reiterated their concern for the timely submission of accurate and comprehensive data on carotenoids and other food additives when updating JEFCA's exposure assessments. They also requested that the report of the Committee reflect the prohibition of ethylene oxide in the EU for sterilizing food additives and specify that no residues above 0.1 mg/kg were allowed.

Outcome/Conclusion

With respect to the CCNE *Regional Standard for Mixed Zaatar*, CCFA54 agreed to refer the issue to the working group on alignment for review and consideration at the next session. The Committee endorsed conforming/consequential changes in existing global commodity standards with respect to riboflavins and beta carotenes as proposed by the Secretariat and requested that the Coordinating Committee for Asia (CCASIA) provide data to justify the maximum levels for carotenoid food additives in four of its regional standards. Considering the response from CCFO, CCFA agreed to eliminate provisions for chlorophylls and paprika extract in the two CCFO standards and to make the correction requested by the European Union.

Agenda Item 3(a): Matters of Interest Arising from FAO/WHO and from the 96th and 97th Meetings of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) Respectively (JEFA96, July 2023) (JEFA97, November 2023)

To Be Presented for Adoption at Next CAC? No

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The U.S. objective was to reach agreement on the conclusions of the JECFA reviews, including the reviews of aspartame and titanium dioxide, and to seek clarification of the status of azodicarbonamide.

Discussion in Relation to United States' Objectives

At its 96th meeting, JECFA evaluated the safety and provided toxicological recommendations or other scientific advice for CCFA54 for one food additive (the artificial sweetener aspartame) and two groups of flavoring agents. At CCFA54, JECFA reported that they found no safety concerns with the flavoring agents they reviewed and reaffirmed the acceptable dietary intake (ADI) of 0–40 milligram/kilogram body weight for aspartame (International Numbering System (INS) 951). The 97th JECFA meeting also reaffirmed the previously established ADI of “not specified” for titanium dioxide (INS 171).

The United States noted that there was no documented explanation provided for the withdrawal of the Acceptable Daily Intake (ADI) for azodicarbonamide (INS 927a). In response, the JECFA Secretariat outlined the procedure and reasons for its withdrawal and affirmed that the decision will be appropriately documented.

The EU asked to reflect in the report that titanium dioxide was not authorized for use in food in the EU, noting that in their opinion the available information reviewed by JECFA indicated limitations and some equivocal findings in the available evidence for genotoxicity and the lack of suitable testing methodologies for nanoparticles.

Outcome/Conclusion

CCFA54 agreed to the final recommendations arising from the 96th and 97th JECFA meetings and agreed to forward to the CAC for revocation the provision for the use of azodicarbonamide in food category 06.2.1 (Flours) based on the explanation from the JECFA Secretariat for withdrawal of the ADI. CCFA also agreed that in the future, if a substance is included on the JECFA Priority List because of a safety concern and no sponsor is found to provide data within a suitable time frame (likely two years), a request will be made by CCFA to JECFA to consider withdrawing the ADI for the additive. The CCFA report reflects the intervention of the EU as requested.

Agenda Item 3(b): Proposed Draft Specifications for the Identity and Purity of Food Additives Arising from the 96th and 97th JECFA Meetings Respectively

To Be Presented for Adoption at Next CAC? Yes

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The U.S. objective was to advance the JECFA specifications prepared at the 96th and 97th JECFA meetings for final adoption by CAC47.

Outcome/Conclusion

CCFA54 agreed to forward for adoption the full specifications for food additives, as recommended by the 96th and 97th JECFA meetings, specifically, the specifications for aspartame and flavorings reviewed by JECFA96 and the specifications for titanium dioxide and flavorings reviewed by JECFA97.

Agenda Item 4a: Endorsement and/or Revision of Maximum Levels for Food Additives and Processing Aids in Codex Standards

To Be Presented for Adoption at Next CAC? Yes

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The U.S. objective was for CCFA54 to endorse the food additive provisions of the standards reviewed.

Discussion in Relation to United States' Objectives

Canada, as chair of the physical working group, reported the working group recommendations for the endorsement of food additive provisions in three standards, from the Codex Committee on Spices and Culinary Herbs (CCSCH) (*Standard for dried or dehydrated roots, rhizomes, and bulbs-turmeric*) and the Codex Committee for Processed Fruits and Vegetables (CCPFV) (*General Standard for Dried Fruits* and *General Standard for Canned Mixed Fruits*).

Outcome/Conclusion

CCFA54 endorsed the food additives provisions for these standards.

Agenda Item 4b: Alignment of the Food Additive Provisions of Commodity Standards and Relevant Provisions of the GSFA

To Be Presented for Adoption at Next CAC? Yes

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious?

Possibly. BMC and dimethyl dicarbonate may be raised by the European Union but not by the United States.

United States Objective

The U.S. objective was CCFA54 endorsement of the food additive provisions for the standards reviewed, as recommended by the working group on alignment.

Discussion in Relation to United States' Objectives

Canada, as chair of the working group on alignment, introduced the report and recommendations of the working group, which was charged with aligning Codex commodity standards with the GSFA with the aim to establish GSFA as the single, authoritative Codex reference for food additives. The working group, which was co-chaired by the United States and Japan, made recommendations for the alignment of the revised food-additive sections of two standards from Codex Committee on Milk and Milk Products (CCMMP) (*Standards for Fermented Milks* (CXS 243-2003) and *Cream and Prepared Creams* (CXS 288-1976)); one standard from Codex Committee on Processed Fruits and Vegetables (CCPFV) (*Standard for Table Olives* (CXS 66-1981)); and two regional standards (*Regional Standards for Laver Products* (Asia) (CXS 323R-2017) and *Yacon* (Latin America and the Caribbean) (CXS 324R-2017)); and editorial corrections to the *General Standard for Cheese* (CXS 283-1978).

Outcome/Conclusion

CCFA54 endorsed the food additive provisions for these standards as recommended by the working group.

Agenda Item 5: General Standard for Food Additives (GSFA)

To Be Presented for Adoption at Next CAC? Yes

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The U.S. objective was for CCFA54 to take the actions recommended by the working group on the GSFA (which is chaired by the United States) with respect to adoption, discontinuation, and revocation of the food additive provisions in the GSFA.

Discussion in Relation to United States' Objectives

The United States, as chair of the physical working group (PWG), introduced the report of the working group on the GSFA, which recommended advancing GSFA provisions for adoption, revocation and discontinuation, and proposed draft food additive provisions for inclusion in GSFA. This work included the advancement of all remaining provisions for sweeteners (except one), including provisions for the use of sweeteners in bakery wares (food category (FC) 07.0)), and snacks (FC 15.0); the completion of provisions for the use of colors generally for seasonings, sauces, and broths (FC 12.0) and dietetic foods (FC 13.0); and remaining provisions for use in wine (FC 14.2) and their subcategories.

Most notably, the Committee considered an alternative note presented by Canada, as follows: "Some Codex members allow the use of additives with sweetener and color functions in this food category while others limit this food category to products without these additives." This alternative note was used for the horizontal approach to sweeteners in food category 07.1 and its subcategories. Chile and the EU requested that it be noted in the report that they do not permit sweeteners in products that fall under food category 07.1 and its subcategories. The EU stated their view that the use level for aspartame in food category 07.1 and its subcategories was not appropriate as it was higher than the use level in food category 07.2 (Fine bakery wares (sweet, salty, savory) and mixes), which specifically includes sweetened products. There was not enough time during the PWG to gather information on any specific products for which the higher use level was warranted, and since no information was provided, CCFA54 agreed to maintain the adopted provision in the GSFA and reconsider the actual use level and application of the alternative note at CCFA55 (2025).

The Committee discussed the provision for propylene glycol as a carrier in food categories for wine (FC 14.1.4.1, 14.1.4.2, and 14.1.4.3). The JECFA Secretariat noted that the safety evaluation of propylene glycol was conducted in 1973. The EU requested that if an updated safety assessment and exposure estimate is conducted, that it be inclusive of all uses of propylene glycol as a carrier, and not just for its use in food category 14.1.4 (Water-based flavored drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks). The Committee agreed that an updated safety evaluation and exposure estimate for propylene glycol may inform the decision on the use of the additive as a carrier in all food categories, as well as consider the specific use in food category 14.1.4 as a carrier for flavors. The EU expressed concerns about the use of methacrylate copolymer, basic (BMC) in food categories 06.1 (Whole, broken, or flaked grain, including rice), 11.1.1 (White sugar, dextrose anhydrous, dextrose monohydrate, fructose), 11.1.2 (Powdered sugar, powdered dextrose),

and 11.2 (Brown sugar excluding products of food category 11.1.3). To achieve consensus, the EU suggested and the CCFA54 agreed to add two notes to the provisions for BMC in these food categories: 1) Note 589 *“For use as a nutrient carrier in a raw material for another ingredient”* and 2) a new Note *“For use in accordance with general principles for the addition of essential nutrients to foods (CXG 9-1987).”* Further, the EU also requested that the proposed new note for the provision for BMC in food category 06.1 be revised to state, *“For use only in nutrient fortified rice”* and a variation of that proposed new note *“For use only in nutrient fortified products”* be considered in food categories 11.1.1, 11.1.2, and 11.2. During the discussion of dimethyl dicarbonate in FCs 14.1.2 and 14.1.3, the Russian Federation noted they did not support these provisions due to concerns about the potential formation of significant amounts of methanol, which could pose health risks to consumers, and stated that in their opinion, there was no technological necessity for using dimethyl dicarbonate in these food categories. The EU, while not objecting to the PWG recommendation, noted that they did not permit the use of dimethyl dicarbonate in FCs 14.1.2 and 14.1.3. An Observer, the International Fruit and Vegetable Juice Association (IFU), expressed their disagreement with these proposed provisions.

Outcome/Conclusions

With the modifications and notes described above, and consistent with the GSFA Physical Working Group recommendations, CCFA54 agreed to forward to CAC47 (2024) the draft and proposed draft food additive provisions of the GSFA for final adoption at Step 8, and Step 5/8, respectively, and revisions to adopted provisions (216 Provisions); the food additive provisions of the GSFA for revocation (4 Provisions); the draft and proposed draft food additive provisions, respectively, for discontinuation in the GSFA (117 Provisions). CCFA54 also agreed to start work on proposed draft food additive provisions for inclusion in the GSFA, (113 Provisions).

Agenda Item 6: Proposed Draft Revision to the Class Names and the International Numbering System (INS) For Food Additives (CXG 36-1989)

To Be Presented for Adoption at Next CAC? No

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The United States had no objections to the proposed revisions to the INS numbering system for food additives. The United States does not follow the INS numbering system. (However, the INS numbering system is important for the correct functioning of the GSFA.)

Discussion in Relation to United States' Objectives

Belgium, as chair of the working group, reviewed the requests for the INS additions or revisions. Of note during the discussion, Brazil requested a clarification on why the INS number applied to oat lecithin (INS 322a) included an alphabetical subscript instead of a numeric subscript. The EU explained that this would allow for separate classification from lecithin (322(i)) because of manufacturing process differences. Furthermore, the FAO representative reiterated the decision to apply a separate INS number for any given additive resided with CCFA.

Outcome/Conclusions

CCFA54 agreed to the revisions to the INS list as recommended by the working group.

Agenda Item 7: JECFA Priority List

To Be Presented for Adoption at Next CAC? The priority list is forwarded to CAC for endorsement.

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The U.S. objective was approval of the priority list and timelines as recommended by the working group.

Discussion in Relation to United States' Objectives

Kenya, as chair of the working group, reviewed the proposed JECFA Priority list which included substances nominated by Members. Japan nominated acylglycerol lipase from *Penicillium crustosum* expressed in *Penicillium crustosum* and triacylglycerol lipase from *Limtongozyma cylindracea*. The International Organization of the Flavor Industry (IOFI) nominated flavoring substances. Also on the list were several substances sponsored by the United States, including glycolipids for safety assessment and establishment of specifications. The list also included a request for the re-evaluation of safety for silicon dioxide. Additionally, the working group recommended amending data availability for sucroglycerides and steviol glycosides. The United States Pharmacopeia (USP) indicated that it will provide data regarding lead levels for activated carbon, bentonite, and diatomaceous earth).

Outcome/Conclusion

CCFA54 endorsed the recommendations to include substances on the Priority List and make editorial corrections to ascorbyl palmitate and gellan gum, low acyl clarified, as recommended by the working group and outlined above.

Agenda Item 8: Discussion Paper on Divergence Between the General Standard for Food Additives (GSFA), Codex Commodity Standards and Other Texts-Identification of Outstanding Issues

To Be Presented for Adoption at Next CAC? No

Have the United States' Objectives Been Met? Yes

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

While the United States supports CCFA efforts to make the GSFA the single reference for food additives, the U.S. objective at this session was to explore alternative options and avoid proposing changes to the *Codex Procedural Manual* at this time.

Discussion in Relation to United States' Objectives

Recognizing the importance of strengthening reliance on the GSFA as the single reference point for food additives, CCFA54 discussed how to avoid future divergence from the GSFA in the food additive provisions developed by Codex commodity committees.

Outcome/Conclusion

Considering that the alignment working group would finish work by 2030, CCFA54 agreed to establish a working group to formulate working practices to include guidance on how commodity committees make proposals to CCFA and how CCFA will incorporate these into the GSFA. The working group will also develop an engagement plan on how the CCFA54 will interact with the commodity and regional committees to ensure alignment. The guidance document and engagement plan will be prepared by China, with Australia, Brazil, Canada, the EU, Senegal, and the United States as co-authors.

Proposals for New Work: Agenda Item 9: Discussion Paper on the Development of a Standard for Baker's Yeast

To Be Presented for Adoption at Next CAC? Yes, it will be forwarded for approval as new work.

Have the United States' Objectives Been Met? NA

Is it anticipated that this item will or should be raised at the CAC because it is contentious? No

United States Objective

The United States did not object to the development of a Codex Standard for Baker's Yeast but had the objective that if a new standard were developed, it should consider existing standards, such as those prepared by International Organization for Standardization (ISO), to avoid inconsistencies.

Discussion in Relation to United States' Objectives

There was general support for this proposal.

Outcome/Conclusion

The Committee agreed to submit to CAC 47 (2024) the proposal for the development of a standard for baker's yeast for approval as new work for CCFA. Subject to CAC approval, CCFA54 established an EWG chaired by China and co-chaired France and Turkiye.