

**European Union reply to
Codex Circular Letter CL 2016/17-PFV**

**Request for Comments: Food additive provisions in Codex standards for
processed fruits and vegetables**

European Union Competence

European Union Vote

The European Union (EU) would like to provide the following comments in reply to CL 2016/17-PFV:

Standard for Canned Chestnuts and Canned Chestnut Puree (CODEX STAN 145-1985)

The EU agrees with the need to provide information justifying the use of firming agents (including information on specific firming agents) in canned chestnuts and canned chestnut puree in order to consider if it is appropriate to include such use in CODEX STAN 145-1985.

Only if the technological need is demonstrated and agreed by the Committee it can then be considered whether a general reference to the GSFA or a list of firming agents in CS 145-1985 is appropriate. Generally, the EU prefers the development of a list of food additives, i.e. an approach which better reflects the needs of the foods falling under the commodity standards (especially where there is no one-to-one relationship with the corresponding much broader GSFA food category).

The EU does not have any information as regards the technological need/ justification for the use of firming agents in canned chestnuts and canned chestnut puree. However, the EU would like to note that there are some food additives which can be used in canned or bottled fruit and vegetables and which could also act as firming agents (INS 327 calcium lactate, INS 333 calcium citrates and INS 509 calcium chloride).

Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007)

Use of INS 523 aluminium ammonium sulfate as a colour retention agent/ firming agent

The EU does not support the use of aluminium ammonium sulfate as a colour retention agent/ firming agent. The EU would like to stress that a colour retention agent is a functional class which was not listed in CODEX STAN 260-2007. In the EU's view, colour retention agents are not necessary for products falling under the standard in question.

Aluminium ammonium sulfate was not listed in CODEX STAN 260-2007 and it could not be used according to that standard before the amendment made in 2015 (see the explanation below).

The EU would like to note that the Codex Committee on Food Additives (CCFA) amended the uses and use levels of aluminium-containing food additives in view of the revised JECFA PTWI in order to decrease the exposure to aluminium (see REP13/FA, para 86). Therefore, the use of aluminium-containing food additives should be avoided where possible and such use shall not go beyond what was agreed by the CCFA on safety grounds.

The EU would like to note that INS 523 aluminium ammonium sulfate is permitted for use in the GSFA category 04.2.2.3 at 520 mg/kg for use in pickled vegetables except for use in perilla in brine at 780 mg/kg. Whilst there are alternatives which should be preferred (i.e. other firming agents not containing aluminium) the current wording of Section 4 of CODEX STAN 260-2007 permits the use of aluminium ammonium sulfate as a firming agent for products falling into the category 04.2.2.3; therefore, no amendment of CODEX STAN 260-2007 is necessary for products falling into that category. However, the EU does not support any extension of use of aluminium ammonium sulfate to foods falling into other categories (i.e. 04.1.2.3., 04.1.2.10 or 04.2.2.7)

Use of INS 405 propylene glycol alginate as a stabilizer

The EU takes note that stabilizers are currently not listed among the functional classes permitted for use in CODEX STAN 260-2007 and that the use of propylene glycol alginate as a stabilizer was reported by one Codex member.

The EU considers that appropriate information has to be submitted to appraise and justify the technological need for stabilisers and in particular for propylene glycol alginate. The EU is not aware of the technological need for INS 405 propylene glycol alginate in pickled fruits and vegetables.