



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
FAO/WHO COORDINATING COMMITTEE FOR ASIA**

**Nineteenth Session**

**Tokyo, Japan, 3-7 November 2014**

**COMMENTS OF JAPAN**

Japan appreciates China for leading the eWG and is pleased to provide the following comments on Draft Regional Standard for Non-Fermented Soybean Products. Our comments are presented in **underlined/bold font** (addition) and ~~strike through font~~ (deletion).

**4. FOOD ADDITIVES**

**4.2 Specific Food Additive Provisions**

**4.2.1 Composite/flavoured Soybean Milk and Soybean-based Beverage**

**Table 3**

Functional Class	INS No.	Name of Food Additives	Maximum Level
Antioxidant	307a, b, c	Tocopherols	20000 mg/kg, <del>singly or in combination</del>
Emulsifier	472e	Diacetyltartaric and fatty acid esters of glycerol	<del>2000</del> <b>2000</b> mg/kg
	473	Sucrose esters of fatty acids	<b>20000 mg/kg, singly or in combination: Sucrose esters of fatty acids (INS473), Sucrose oligoesters, type I and type II (INS473a) and Sucroglycerides (INS 474)</b>
	<b>473a</b>	<b><u>Sucrose oligoesters, type I and type II</u></b>	
	<b>474</b>	<b><u>Sucroglycerides</u></b>	
Sweetener	=	<del>Trehalose</del>	<del>500 mg/kg</del>
Flavour enhancer	<del>640</del>	<del>Glycine</del>	<del>1000 mg/kg</del>

**Rationale**

**Tocopherols (INS 307a, b, c)**

Tocopherols are considered as a group because JECFA assigned a group ADI to these food additives.

*Procedures for consideration of the entry and review of food additive provisions in the general standard for food additives* in the Codex Procedure Manual clearly states, "Food additives that share a numerical group ADI will be considered as a group without further restrictions on the use of individual additives in that group."

According to the General Standard for Food Additives (GSFA), food additive provisions for tocopherols are adopted without note "singly or in combination" in two food categories.

Therefore, this food additive provision should be consistent with other food additive provisions of tocopherols.

**Diacetyltartaric and fatty acid esters of glycerol (INS 472e)**

Diacetyltartaric and fatty acid esters of glycerol (INS 472e) are used as emulsifier to prevent sedimentation of ingredients at 2000 mg/kg in composite/flavoured soybean milk and soybean-based beverage. The maximum use level of INS 472e should be modified to 2000 mg/kg.

**Sucrose esters of fatty acids (INS 473), Sucrose oligoesters, type I and II (INS 473a) and Sucroglycerides (INS 474)**

Sucrose oligoesters, type I and type II (INS 473a) are used as emulsifier to prevent sedimentation of ingredients in composite/flavoured soybean milk and soybean-based beverage. INS 473a should be included in this food additive list.

INS 473, INS 473a and INS 474 share the numerical group ADI, so the maximum use level for these food additives should be set as a group according to the Codex procedure manual. Japan would like to propose adding the new note 'Singly or in combination: Sucrose esters of fatty acids (INS473), Sucrose oligoesters, type I and type II (INS473a) and Sucroglycerides (INS 474)'.

Though Sucroglycerides are not used in Japan, if there are not any reasons to exclude Sucroglycerides, it should be included in the food additive list.

### **Trehalose**

Trehalose is a disaccharide sugar and a disaccharide sugar is out of definition for "sweetener" according to the *Class Names and the International Numbering System for Food Additives* (CAC/GL 36-1989). Sweetener is defined as "a food additive (other than a mono- or disaccharide sugar), which imparts a sweet taste to a food" in CAC/GL 36-1989. Therefore, trehalose should not be included in this food additive list.

### **Glycine (INS 640)**

Glycine has not been assessed as a food additive and assigned an ADI by JECFA. Glycine should not be included in this food additive list until JECFA assigns an ADI to Glycine as a food additive.

The *Relations between Commodity Committees and General Subject Committees* in the Codex procedural manual states, "All provisions in respect of food additives contained in commodity standards will require endorsement by the Committee on Food Additives, on the basis of technological justification submitted by the commodity committees and on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use (acceptable daily intake (ADI) and other restrictions) and an estimate of the potential and, where possible, the actual intake of the food additives, ensuring conformity with the Preamble of the General Standard for Food Additives."

The Preamble of the *Codex General Standard for Food Additives* (CODEX STAN 192-1995) states, "Only food additives that have been assigned an Acceptable Daily Intake (ADI) or determined, on the basis of other criteria, to be safe by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) and an International Numbering System (INS) designation by Codex will be considered for inclusion in this Standard."