



29 September 2006

**ISDI COMMENTS on
Codex Guideline for the Use of Flavourings**

ISDI proposed changes	ISDI Comments
<p>1.0 SCOPE</p> <p>This guideline provides principles for the safe use of flavorings flavourings that have been evaluated by experts qualified in scientific training and experience to evaluate the safety of flavourings and determined to present no safety concern at current estimated levels of intake, including those evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA), and for which corresponding specifications of identity and purity have been established.</p>	<p><u>Change</u> “<i>flavorings</i>” into “<i>flavourings</i>”</p> <p><u>Rational</u>: Consistency with the rest of the Guideline.</p>
<p>2.0 DEFINITIONS</p> <p>1) Flavour is the sum of those characteristics of any material taken in the mouth, perceived principally by the senses of taste and smell, and also the general pain and tactile receptors in the mouth, as received and interpreted by the brain. The perception of flavour is a property of flavourings.</p> <p>⇒ 2) Flavourings are products that are added to food to impart or modify the flavour of food, rather than to enhance nutritional quality or to fulfill other technological effects. Flavourings do not include substances that have an exclusively sweet, sour, or salty taste. Flavourings are not intended to be consumed as such. Flavourings may be natural or synthetic, and may contain adjuvants.</p>	<p>ISDI believes that subcategories numbering/lettering may need modifications as shown in the left column.</p> <p>ISDI would like to ask why neither “<i>Smoke flavourings</i>” nor “<i>Thermal process flavourings</i>” are not defined in the guideline, although often used in foodstuffs for human consumption.</p> <p>Besides, ISDI would like to question if the term “<i>flavour precursor</i>” should not be defined in the Guideline.</p>

<p>2)i) <u>Flavouring substances</u> are chemically-defined substances either formed by chemical synthesis, or obtained from materials of vegetable or animal origin. Classes of chemically-defined flavouring substances include <i>natural</i>, and <i>synthetic flavouring substances</i>.</p> <p>2)i)(1) <u>Natural flavouring substances</u> are chemically-defined flavouring substances obtained by physical processes (e.g. distillation and solvent extraction), or by enzymatic or microbiological processes, from material of vegetable or animal origin either in the raw state, or after processing for human consumption by traditional food-preparation processes (e.g. drying, torrefaction (roasting) and fermentation).</p> <p>2)i)(2) <u>Synthetic flavouring substances</u> are chemically-defined flavouring substances formed by chemical synthesis and intended for human consumption.</p> <p>2)ii) <u>Natural flavouring complexes</u> are preparations that contain flavouring substances obtained exclusively by physical, microbiological, or enzymatic processes from material of plant or animal origin, either in the raw state, or after processing for human consumption by traditional food preparation processes (e.g. drying, roasting, and fermentation). Natural flavouring complexes include the essential oil, essence, or extractive, protein hydrolysate, distillate, or any product of roasting, heating, or enzymolysis.</p>	
<p>3.0 GENERAL PRINCIPLES FOR THE USE OF FLAVOURINGS</p> <p>3.5 Flavourings may contain food ingredients necessary as a matrix for dissolving, dispersing or diluting flavourings in food, or that are necessary for the production, storage, handling and use of the flavourings. They should be used according to the following principles:</p>	

<p>a) Such food ingredients should be limited to the lowest level required to ensure the safety and quality of the flavourings, and to facilitate their storage;</p> <p>b) The quantities of ingredients used in the manufacturing, processing or delivery of flavourings to food that are not intended to accomplish any physical or technical effect in the food itself should be reduced to the extent reasonably possible;</p> <p>c) Food ingredients that are used at levels that provide a functional effect technological function in the finished food are food additives and may only be used in accordance with the provisions of the Codex General Standard for Food Additives (GSFA; CODEX STAN 192).</p>	<p><u>Change</u> “<i>functional effect</i>” into “<i>technological function</i>”</p> <p><u>Rational</u>: Neither “<i>Functional effect</i>” nor any comparable wording are defined by GSFA although, GSFA recognises functional classes of additives. Therefore it may be more accurate to use the term “<i>technological function</i>”.</p>
<p>4.0 NATURAL TOXICANTS</p>	<p>ISDI believes that Codex maximum levels should be in line with maximum levels already set in other legislations or proposed for upcoming legislations.</p> <p>For example,</p> <ul style="list-style-type: none"> - the Codex guideline allows the use of <i>Quassin</i> up to a maximum level of 5 mg/kg food, while the EU proposal forbids its use, - the Codex guideline limits <i>Quinine</i> to 85 mg/kg beverages, while <i>Quinine</i> is not included in the EU proposal. <p>ISDI would like to point out the fact that not setting maximum levels for cocaine may lead to several approaches of the “<i>cocaine-free</i>” level in the different MS and therefore suggests that, if technically possible, a level is set.</p> <p>Besides, ISDI would like to ask why maximum levels have not been set for <i>Estragole</i> and <i>Methyl eugenol</i>. As for cocaine, it could generate different interpretations among MS.</p> <p>ISDI would also like to suggest that <i>Quassin</i> and <i>Quinine</i> are listed in a separated table as those substances, in opposition to the others, may be</p>

	added directly.
<p>5.0 METHOD OF ANALYSIS</p> <p>References to general and specific methods suitable for the analysis of flavourings may be found in Appendix B of this guideline.</p>	<p>ISDI suggests that an introductory sentence, as proposed in the left column, is added to the section 5.0 and that the sections 5.1 and 5.2 are put in an Appendix B.</p> <p><u>Rational</u>: Allows for more clarity and consistency with the listing of Appendix A.</p>
<p>APPENDIX B</p> <p>REFERENCES TO GENERAL AND SPECIFIC METHODS OF ANALYSIS SUITABLE FOR FLAVOURINGS</p>	<p>As mentioned above, ISDI proposes to create an Appendix B which would gather the references listed, at the moment under sections 5.1 and 5.2.</p>