

31 October 2018

**CODEX COMMITTEE ON NUTRITION AND FOODS  
FOR SPECIAL DIETARY USES**  
Fortieth Session

## ISDI KEY POINTS

### FOOD ADDITIVES – MECHANISM or FRAMEWORK FOR CONSIDERING TECHNOLOGICAL JUSTIFICATION of FOOD ADDITIVES (CX/NFSDU 18/40/11)

- ISDI considers that the framework proposed in Section B of the circular paper has improved from the version presented last year, but still contains elements that both leave ambiguity around the information being requested from industry, and could lead to subjective assessments of the technological effect of additives.
- Furthermore, we consider it is important that these criteria do not overlap with the evaluations already being conducted for additives by CCFA. Thus, we question the need for the Q2 set of questions in the proposed framework [COMPLIANCE WITH SECTION 3.2 OF THE PREAMBLE TO THE GSFA], as these factors will be taken into account by CCFA.
- While ISDI considers that modifications are needed to the framework proposed in Section B, we strongly support that based on the documentation provided by industry, xanthan gum, pectin, and gellan gum fully satisfy the criteria proposed and thus should be endorsed by the Committee, confirming that technological justification has been established.
- ISDI believes that the scope proposed under Q3 [COMPLIANCE WITH THE APPROACH ON THE USE OF ADDITIVES IN FOODS INTENDED FOR INFANTS AND YOUNG CHILDREN] should apply only to what is relevant to technological justification and not to matters related to safety. Thus Q3.2, which considers “more suitable” additives is related to safety and should be removed.