

Dear Sir/Madam,

We are writing to consult and propose the adoption of CODEX regarding antioxidants & preservatives used in flavours in the proposed amendment CAP 132BD.

According to the definitions in [GUIDELINES FOR THE USE OF FLAVOURINGS CAC/GL 66-2008](#), flavour and flavourings are well defined, and in Section 2.3 Non-flavouring food ingredients are defined as the food additives and foodstuffs that can be added to flavourings and are necessary for multiples purposes including improving the storage. In the proposed amendment 16.2, only three preservatives/antioxidants are listed, which are Benzoates, Hydroxybenzoates, para- and sulphites. However, more varieties of preservatives/antioxidants are commonly used to perform and maintain the quality of the flavours and flavourings during storage such as but not limited to Tocopherols (INS 307a b c), Butylated hydroxyanisole (INS320) and Butylated hydroxytoluene (INS 321). INS 320 (FEMA 2183) and INS 321 (FEMA2184) are also FEMA approved substances.

In addition, under the General Standard for Food Additives (GSFA) (CODEX STAN 192-1995), Codex has stipulated the condition that apply to the carry-over of food additives from ingredients and raw materials into foods. According to the [General Standard for the Labelling of Prepackaged Foods](#), food additives that are carried over into foods at a level less than that required to achieve a technological need not be declared.

Hereby we would like to consult HKCFS on the interpretation of antioxidants & preservatives used in flavours/flavourings for food products sold in Hong Kong. We sincerely propose the adoption of the guideline in CODEX that non-flavouring food ingredients which performs antioxidants & preservatives function may be exempted or not limited to the additives listed in 16.2 from the proposed CAP 132BD amendment if the usage of antioxidants & preservatives met the definition in GUIDELINES FOR THE USE OF FLAVOURINGS CAC/GL 66-2008, and also the declaration requirement for such situation may be adopted the carryover concept in General Standard for the Labelling of Prepackaged Foods, to harmonize with international standards and minimize the trade impact.

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