



Proposal on EU additive codification

1. Current situation

The current system for numbering food and feed additives using E numbers as typified with the example of the chemical propandiol below is confusing as different numbers only are used to distinguish between specifications for food or feed use. It also happens that the same E number is used for additives that are actually different (example E 559 for aluminium silicate (kaolin) in food versus kaolinitic clays in feed). This could be considered appropriate if most end users are familiar with the numbers. Unfortunately this is not always the case and a 'mistake' may lead to food safety concerns. .

Example:

1,2-Propandiol is currently assigned the following E numbers dependant on whether the product is for food or feed use:

E 1520: 1,2-Propandiol with specifications for food use, and

E 490: 1,2-Propandiol with specifications for feed use.

In addition to the above, most consumers associate E numbers with food and not necessarily feed additives. Fefana therefore considers that it might be appropriate to suggest a change to the current additives numbering system which will not only be transparent and informative but also brings together the holistic approach the Commission is instigating with regards to food and feed law.

2. Why is an EU codification necessary

- To clearly identify and distinguish additives on the basis of their technical specifications;
- To clearly identify additives' origin and associated specifications if already in food or feed.

3. FEFANA proposal

Fefana proposes a unique numbering system for both food and feed additives but with additional letters to indicate whether the product should be for:

- food (with a pre-fix 'E' before a number),
- feed (with the letter 'F' following a number) or
- food and feed specifications (with the prefix 'E' and the letter 'F' following a number).

The number should either be that already assigned to a particular additive with food specifications before the current system was commenced (provided there is no confusion possible on the nature of the additive) or the Merck Index number (or other number source as appropriate: FEMA or EINECS or CAS). This will ensure that most of the points raised in paragraph 1 on the current numbering system are addressed. Below are practical examples of the Fefana proposal.

- EXAMPLE A: 'E' numbering for additives with specifications for food use only

E + number – the number should be the EU number already assigned for the food additive or the Merck index reference if a number has not been previously assigned to the additive.

For example using citric acid, the E number could be:

E 330 : Citric acid with food specifications

and in the case where an E number does not currently exist, E 2328 should be given. The latter is the Merck index number for citric acid.

- EXAMPLE B: 'E' numbering for additives with specifications for feed use only Number + F (please note that number is first here) – the number should be an EU number where it exists and where it does not the Merck index reference

Using the example of citric acid again then the number for the additive for feed use only should be as follows:

330F: Citric acid with feed use specifications only

2328F: Citric acid with feed use specifications

The latter number is the Merck index number for citric acid.

- EXAMPLE C: 'E' numbering for additives with food specifications but also authorised for use in feed

This should be a combination of examples A and B *i.e.* E + number + F

The number should be the EU number of the additive if it exists or the Merck index number. Using the example of citric acid again, for citric acid with food specifications but authorised for use in feed the number should be E 330 F (or E 2328 F). Here the numbering provides information at first sight on the specifications with the prefix E before the number signifying food specifications and the letter F after the number signifying feed specifications are also met.

E	330	F
Food specs	Number	Feed specs

Finally, if it is intended or necessary to provide additional information concerning the functional group of the additive with this numbering system, then manufacturers may consider including in their label, the functional group as in Regulation 1831/2003 either with the appropriate letter in miniscule to signify the function or the functions. For example for preservatives and using the example of citric acid, you will have the following: E330F 1.a. These indicate that the citric acid is intended for use as technological additive with functionality preservative and meets both food and feed specifications.

There is indeed no need to integrate this aspect in the reference number of the additive in the Register (what would impose a change of numbering each time the authorization is modified – extensions etc.-) while it can be easily implemented by the manufacturer or the user of the additive on the packaging.