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Thai FDA Proposed Revisions to MLs of Certain Food Additives

Report Categories:

Sanitary/Phytosanitary/Food Safety

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Report Highlights:

TH6005 On January 8, the Thai Food and Drug Administration (FDA) notified WTO (G/SPS/N/THA/234) about proposed revisions to maximum levels (ML) for certain food additives. This proposal affects all products that use sweeteners, colorings and preservatives. Comments from industry and concerned stakeholders should be directed to the National Bureau of Agricultural Commodity and Food Standards (ACFS), national SPS enquiry point at spsthailand@gmail.com prior to the March 8. Note Annex 2 to this report only includes those proposed MLs that differ from established CODEX MLs.

General Information:

Thai FDA Proposed Revisions to Maximum Levels of Certain Food Additives

On January 8, the Thai Food and Drug Administration (FDA) notified WTO (G/SPS/N/THA/234) about proposed revisions to maximum levels (ML) for certain food additives. The proposal, entitled “The Notification of the Ministry of Public Health Regarding Food Additives No. 4, (Notification No. 4)” aligns the format of the existing regulations governing food additives with the established CODEX format, and adopts standardized Codex food categories. Specifically, the proposal would 1) prescribe/establish the conditions and instances where certain food additives will be permitted, and 2) revise MLs for certain food additives where intake of such food additives from all its uses exceeded its Acceptable daily intake (ADI).

There are two annexes to this report. Annex 1 contains an unofficial translation of Thailand proposed new regulation. **Annex 2 contains a list of ONLY those MLs that differ from established CODEX MLs. Note: The official notification by Thailand to the WTO in its entirety is available at <https://docs.wto.org> and contains the entire list of proposed MLs.**

In the past, Thai FDA governed food additives (Notification of the Ministry of Public Health No. 281 B.E. 2547 re: Food Additives) under three broad categories: those with MLs adopted directly from CODEX; those with MLs established independently by the Thai FDA; and finally those where industry practices were recognized (aka “status quo”). Notification No. 4 proposes to replace the second and third categories with either MLs from General Standard for Food Additives: GSFA 2015 or MLs independently established by Thai FDA.

Notification No.4 proposes revised MLs for 4 categories of food additives: sweeteners, preservatives, colorings, and other food additives. These proposed MLs are lower than those established by CODEX because the Thai FDA’s Food Technical Subcommittee on Food Additives contends that exposure levels in Thailand is higher. This is based on Thailand’s evaluation of actual food consumption data and criteria to establish maximum use levels for food additives in various food groups to ensure that the intake of a food additive from all its uses does not exceed its ADI. The new proposed levels are outlined in Annex 2.

Table 1: Food additives whose proposed maximum levels differ from CODEX

Sweeteners (5 substances):

- ACESULFAME POTASSIUM (INS 950)
- ALITAME (INS 956)
- ASPARTAME (INS 951)
- SACCHARIN (INS 954(i)-(iv))
- SUCRALOSE (INS 955)

Preservatives (3 substances):

- BENZOATES (INS 210-213)
- SORBATES (INS 200-203)
- SULFITES (INS 220-225, 227-228, 539)

Colorings (10 substances):

- Allura red AC (INS 129)
- Indigotine (INS 132)
- Fast green FCF (INS 143)
- Ponceau 4R (INS 124)
- Carmines (INS 120)
- Grape skin extract (INS 163(ii))
- Caramel III - ammonia caramel (INS 150c)
- Caramel IV – sulfite ammonia caramel (INS 150d)
- Iron oxides (INS 172 (i)-(iii))
- Riboflavins (INS 101 (i)-(iii))

Other Food Additives (4 substances):

- ASCORBYL ESTERS (INS 304-305)
- DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL (INS 472e)
- PROPYLENE GLYCOL ESTERS OF FATTY ACIDS (INS 477)
- SUCROGLYCERIDES (INS 474)

For the combined use of two or more food additives classified in the same functional class and where the maximum levels of each have been individually set, Notification No. 4 proposes that the sum of the proportions of each additive used cannot exceed one “1”. Table 2 illustrates an example of where both benzoate (proposed new ML of 1,000 ppm) and sorbate (proposed new ML of 500 ppm) might be used together as preservatives in candied fruit while meeting the new ML requirements.

Table 2: Example of how MLs of each food additive are determined for the combined use of two or more food additives classified in the same functional class.

	Benzoate	Benzoate Proportion	Sorbate	Sorbate Proportion	Proportion of Preservative Used in Food
Formula 1	1,000 ppm	1	0 ppm	0	1
Formula 2	750 ppm	0.75	125 ppm	0.25	1
Formula 3	500 ppm	0.50	250 ppm	0.50	1
Formula 4	250 ppm	0.25	375 ppm	0.75	1
Formula	0 ppm	0	500	1	1

5			ppm		
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Notification No.4 also proposes a new process by which an interested party (a domestic food manufacturer, a food importer, etc.) can request Thai FDA establish an ML for a new food additive, or a new food category for an already registered food additive. In general, this process requires that such food additives must pass a safety assessment according to the rules, conditions and procedures as follows:

- (1) Food additives have the qualities or standards according to the latest version of the Codex Advisory Specification for the Identity and Purity of Food Additives or the Thai FDA’s Notification regarding Prescribed Quality and Standard of Food Additives;
- (2) Food additives pass the exposure assessment in accordance with the principle approved by the Food Committee;
- (3) Food additives have the technical documents or reliable research publications supporting the necessity of using such additives in food;
- (4) Use of food additives comply with the current laws and regulations of at least two countries, which have a reliable risk assessment system, namely the European Union, Australia, New Zealand, the United States of America or Japan.

Note: Unique regulatory requirements for “Specific Controlled Food” and “Prescribed Quality and Standardized Food” under the Thai FDA’s food classification supersede those proposed Notification No 4.

A transition period of one year is proposed from the effective date of the implementation of Notification No. 4 until its enforcement.

The final date for comments on the proposed regulation (G/SPS/N/THA/234) is March 8, 2016. Comments should be submitted to the National Bureau of Agricultural Commodity and Food Standards (ACFS), national SPS enquiry point at spsthailand@gmail.com

ANNEX I: Draft Notification of the Ministry of Public Health Re: Food Additive No. 4 and the annex of the notification is available under WTO notification for G/SPS/N/THA/234.

(Draft)
 Notification of the Ministry of Public Health
 (No.....)B.E.....
 Re: Food Additive (No. 4)

It deems appropriate to revise some provisions of the Notification of the Ministry of Public Health Re: Food Additives, which includes Cyclamate and Steviol glycoside to be up to date with the food production technology and benefit of consumer protection.

By the virtue of provisions of Section 5 in the first paragraph and Section 6 (1) (2) (4) (5) (6) (7) (9) and (10) of the Food Act B.E. 2522 (1979), the Minister of Public Health hereby issues the notification as follows:

Clause 1. The following Notifications shall be repealed:

(1) The Notification of the Ministry of Public Health No. 359 B.E. 2556 (2013), Re: Cyclamate, dated on 8 July B.E. 2556 (2013);

(2) The Notification of the Ministry of Public Health No. 360 B.E. 2556 (2013), Re: Steviol glycoside, dated on 8 July B.E. 2556 (2013).

Clause 2. Clause 6 of the Notification of the Ministry of Public Health No. 281 B.E. 2547 (2004) on Food Additives, dated on 18 August B.E. 2547 (2004) shall be repealed and replaced by the following provision:

"Clause 6 the use of food additives shall follow the name of food additive, category or type of food, functional classes and maximum permitted use level according to annex I and annex II of this Notification."

For the combined use of two or more food additives classified in the same functional classes, with the maximum level has been individually set, the sum of the quantities obtained by dividing the amount of each food additive used by the maximum permitted level for that food additive must not exceed one.

The use of food additives that differs from the statement stipulated in the first and second paragraph shall be approved by the Food and Drug Administration. Such food additives shall pass the safety assessment according to the rules, conditions and procedures for permission as follows:

(1) Food additives shall have the qualities or standards according to the latest version of the Codex Advisory Specification for the Identity and Purity of Food Additives or the Thai FDA's Notification regarding Prescribed Quality and Standard of Food Additives;

(2) Food additives pass the exposure assessment in accordance with the principle approved by the Food Committee;

(3) Food additives have the technical documents or reliable research publications supporting the necessity of using such additives in food;

(4) Use of food additives comply with the current laws and regulations of at least two countries, which have the reliable risk assessment system, namely the European Union, Australia, New Zealand, the United States of America and Japan.

The use of food additives according to the first, second and third paragraph shall not enforce on "Specific Controlled Food" or "Prescribed Quality and Standardized Food" as the use of food additives in these food categories were already stipulated in their own specific regulations.

Clause 3. Clause 7 of the Notification of the Ministry of Public Health No. 281 B.E. 2547 (2004), Re: Food Additives, dated on 18 August B.E. 2547 (2004) shall be repealed.

Clause 4. The food manufacturer or importer, obtaining a permission prior to the effective date of this Notification, shall comply with this Notification within one year from the effective date.

Clause 5. This Notification shall come into force after the date of its publication in the Royal Gazette.

ANNEX II: The revised maximum levels of each food additives that are different from CODEX

Sweeteners:

- ACESULFAME POTASSIUM (INS 950)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	350	350	mg/kg	161,188
04.1.2.5	Jams, jellies, marmalades	1,000	Not allow	mg/kg	
05.3	Chewing gum	5,000	2,000	mg/kg	161,188
14.1.4	Water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	600	500	mg/kg	161,188

- ALITAME (INS 956)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	100	40	mg/kg	161
04.1.2.5	Jams, jellies, marmalades	100	Not allow	mg/kg	
05.1.4	Cocoa and chocolate products excluding chocolate products as per MOPH Notification No. 83 Re: Chocolates	300	300	mg/kg	161
14.1.4	Water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	40	40	mg/kg	161

- ASPARTAME (INS 951)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	600	350	mg/kg	161,191
04.1.2.5	Jams, jellies, marmalades	1,000	Not allow		
05.1.1	Cocoa mixes (powders) and cocoa mass/cake	3,000	2,000	mg/kg	97,191

05.1.4	Cocoa and chocolate products excluding chocolate products as per MOPH Notification No. 83 Re: Chocolates	3,000	3,000	mg/kg	161,191
05.3	Chewing gum	10,000	2,500	mg/kg	161,191
14.1.4	Water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	600	500	mg/kg	161,191

- SACCHARIN (INS 954(i)-(iv))

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	80	80	mg/kg	161
04.1.2.5	Jams, jellies, marmalades	200	Not allow	mg/kg	
05.1.4	Cocoa and chocolate products excluding chocolate products as per MOPH Notification No. 83 Re: Chocolates	500	500	mg/kg	161
05.3	Chewing gum	2,500	1,200	mg/kg	161
14.1.4.1	Carbonated water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	300	200	mg/kg	161
14.1.4.2	Non-carbonated water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	300	200	mg/kg	161
14.1.4.3	Concentrates (liquid or solid), excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	300	200	mg/kg	127,161

- SUCRALOSE (INS 955)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	300	300	mg/kg	161

04.1.2.5	Jams, jellies, marmalades	400	Not allow	mg/kg	
05.1.1	Cocoa mixes (powders) and cocoa mass/cake	580	500	mg/kg	97
05.1.4	Cocoa and chocolate products excluding chocolate products as per MOPH Notification No. 83 Re: Chocolates	800	800	mg/kg	161
05.3	Chewing gum	5,000	2,500	mg/kg	161
14.1.4	Water-based flavored drinks, excluding ""electrolyte" drinks as per MOPH Notification No. 195 Electrolyte Drinks.	300	300	mg/kg	127,161

Preservatives:

- BENZOATES (INS 210-213)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
1.7	Dairy-based desserts excluding milk ice cream as per MOPH Notification No. 354 Re: Ice Cream and flavored yogurts as per MOPH Notification No. 353 Re: Fermented Milk	300	300	mg/kg	13
2.4	Fat-based desserts excluding modified ice cream made from vegetable fat	1,000	1,000	mg/kg	13
04.1.2.2	Dried fruit	800	Not allow	mg/kg	
04.1.2.12	Cooked fruit	1,000	500	mg/kg	13
04.2.2.2	Dried vegetables, seaweeds, and nuts and seeds	1,000	Not allow	mg/kg	
04.2.2.8	Cooked or fried vegetables and seaweeds	1,000	500	mg/kg	13
05.2	Confectionery including hard and soft candy, nougats, etc.	1,500	1,000	mg/kg	13
07.0	Bakery wares	1,000	Not allow		
09.2.4.2	Cooked mollusks, crustaceans, and echinoderms	2,000	1,000	mg/kg	13,182
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	200	Not allow	mg/kg	
10.2.1	Liquid egg products	5,000	2,500	mg/kg	13

10.4	Egg-based desserts	1,000	500	mg/kg	13
12.2.2	Seasonings and condiments	1,000	500	mg/kg	13
12.3	Vinegars	1,000	Not allow	mg/kg	
12.5	Soups and excluding canned soup as per MOPH Notification No. 355 Food in a Hermetically Sealed Container	500	500	mg/kg	13,338,339
13.5	Dietetic foods	2,000	1,000	mg/kg	13
14.1.2.1	Fruit juice	1,000	200	mg/kg	13,91,122
14.1.2.3	Concentrates for fruit juice	1,000	200	mg/kg	13,91,122,127
14.1.3.1	Fruit nectar	1,000	200	mg/kg	13,91,122
14.1.3.3	Concentrates for fruit nectar	1,000	200	mg/kg	13,91,122,127
14.1.3.4	Concentrates for vegetable nectar	600	200	mg/kg	13
14.1.4	Water-based flavored drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	600	200	mg/kg	13,123,301
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	1,000	200	mg/kg	13
15.1	Snacks - potato, cereal, flour or starch based	1,000	Not allow	mg/kg	

- SORBATES (INS 200-203)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented excluding flavored milk as per MOPH Notification No. 351 Re: Flavored Milk	1,000	1,000	mg/kg	42,220
01.7	Dairy-based desserts excluding milk ice cream as per MOPH Notification No. 354 Re: Ice Cream and flavored yogurts as per MOPH Notification No. 353 Re: Fermented Milk	1,000	1,000	mg/kg	42
02.4	Fat-based desserts excluding modified ice cream made from vegetable fat	1,000	1,000	mg/kg	42
12.5	Soups and excluding canned soup as	1,000		mg/kg	42,338,339

	per MOPH Notification No. 355 Food in a Hermetically Sealed Container		1,000		
14.1.2.1	Fruit juice	1,000	200	mg/kg	42,91,122
14.1.2.3	Concentrates for fruit juice	1,000	200	mg/kg	42,91,122,127
14.1.3.1	Fruit nectar	1,000	200	mg/kg	42,91,122
14.1.3.3	Concentrates for fruit nectar	1,000	200	mg/kg	42,91,122,127
14.1.4	Water-based flavored drinks	500	200	mg/kg	42,127
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	500	200	mg/kg	42,160

- SULFITES (INS 220-225, 227-228, 539)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
04.1.2.2	Dried fruit	1,000	500	mg/kg	44,135,218
04.2.2.7	Fermented vegetable and seaweed products	500	100	mg/kg	44
12.6	Sauces and like products	300	150	mg/kg	44

Colorings:

- Allura red AC (INS 129)- Same as CODEX
- Indigotine (INS 132) - Same as CODEX
- Fast green FCF (INS 143) - Same as CODEX
- Ponceau 4R (INS 124)- Same as CODEX
- Carmines (INS 120) - Same as CODEX
- Grape skin extract (INS 163(ii))

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	150	Not Allow	mg/kg	
01.4.4	Cream analogues	150	Not Allow	mg/kg	
01.5.2	Milk and cream powder analogues	150	Not Allow	mg/kg	
01.6.2.2	Rind of ripened cheese	1,000	Not Allow	mg/kg	

01.6.4.2	Flavored processed cheese	1,000	Not Allow	mg/kg	
01.6.5	Cheese analogues	1,000	Not Allow	mg/kg	
04.1.2.3	Fruit in vinegar, oil, or brine	1,500	Not Allow	mg/kg	
04.1.2.4	Canned or bottled (pasteurized) fruit	1,500	Not Allow	mg/kg	
04.1.2.7	Candied fruit	1,000	Not Allow	mg/kg	
04.1.2.8	Fruit preparations	500	Not Allow	mg/kg	
04.1.2.10	Fermented fruit products	500	Not Allow	mg/kg	
04.2.2.3	Vegetables and seaweeds in vinegar, oil, brine, or soybean sauce	100	Not Allow	mg/kg	
04.2.2.5	Vegetable, seaweed, and nut and seed purees and spreads	100	Not Allow	mg/kg	
04.2.2.6	Vegetable, seaweed, and nut and seed pulps and preparations	100	Not Allow	mg/kg	
04.2.2.7	Fermented vegetable and seaweed products	100	Not Allow	mg/kg	
05.1.3	Cocoa-based spreads, including fillings	200	Not Allow	mg/kg	
05.1.4	Cocoa and chocolate products	200	Not Allow	mg/kg	
05.1.5	Imitation chocolate, chocolate substitute products	200	Not Allow	mg/kg	
6.3	Breakfast cereals	200	Not Allow	mg/kg	
07.1.2	Crackers, excluding sweet crackers	200	Not Allow	mg/kg	
07.1.4	Bread-type products	200	Not Allow	mg/kg	
8.2	Processed meat, poultry, and game products in whole pieces or cuts	5,000	Not Allow	mg/kg	
8.3	Processed comminuted meat, poultry, and game products	5,000	Not Allow	mg/kg	
8.4	Edible casings (e.g., sausage casings)	5,000	Not Allow	mg/kg	
09.2.3	Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	GMP	500	mg/kg	16,95
09.2.4.1	Cooked fish and fish products	500	Not Allow	mg/kg	

09.2.4.2	Cooked mollusks, crustaceans, and echinoderms	1,000	Not Allow	mg/kg	
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	1,000	Not Allow	mg/kg	
09.3.3	Caviar and other fish roe products	1,500	Not Allow	mg/kg	
09.3.4	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	1,500	Not Allow	mg/kg	
9.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	1,500	Not Allow	mg/kg	
12.4	Mustards	200	Not Allow	mg/kg	
12.5	Soups	500	Not Allow	mg/kg	
12.6.1	Emulsified sauces	300	Not Allow	mg/kg	
12.6.2	Non-emulsified sauces	300	Not Allow	mg/kg	
12.6.3	Mixes for sauces and gravies	300	Not Allow	mg/kg	
12.7	Salads and sandwich spreads	1,500	Not Allow	mg/kg	
13.3	Dietetic foods intended for special medical purposes	250	Not Allow	mg/kg	
13.4	Dietetic formulae for slimming purposes and weight reduction	250	Not Allow	mg/kg	
13.5	Dietetic foods	250	Not Allow	mg/kg	
14.1.4	Water-based flavored drinks	300	160	mg/kg	181

- Caramel III - ammonia caramel (INS 150c)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		

01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	2,000	500	mg/kg	52
01.3.2	Beverage whiteners	1,000	500	mg/kg	
01.4.4	Cream analogues	5,000	2,500	mg/kg	
01.5.2	Milk and cream powder analogues	5,000	2,500	mg/kg	
01.6.1	Unripened cheese	15,000	7,500	mg/kg	201
01.6.2.2	Rind of ripened cheese	50,000	25,000	mg/kg	
01.6.4.2	Flavored processed cheese	50,000	25,000	mg/kg	
01.6.5	Cheese analogues	50,000	25,000	mg/kg	
1.7	Dairy-based desserts	2,000	1,000	mg/kg	
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500	250	mg/kg	
2.3	Fat emulsions mainly of type oil-in-water	20,000	10,000	mg/kg	
2.4	Fat-based desserts	20,000	10,000	mg/kg	
04.1.2.3	Fruit in vinegar, oil, or brine	200	100	mg/kg	
04.1.2.4	Canned or bottled (pasteurized) fruit	200	100	mg/kg	
04.1.2.5	Jams, jellies, marmalades	200	100	mg/kg	
04.1.2.6	Fruit-based spreads	500	250	mg/kg	
04.1.2.7	Candied fruit	200	100	mg/kg	
04.1.2.8	Fruit preparations	7,500	3,750	mg/kg	182
04.1.2.9	Fruit-based desserts	200	100	mg/kg	
04.1.2.11	Fruit fillings for pastries	7,500	3,750	mg/kg	
04.2.2.2	Dried vegetables, seaweeds, and nuts and seeds	50,000	25,000	mg/kg	76,161
04.2.2.3	Vegetables and seaweeds in vinegar, oil, brine, or soybean sauce	500	250	mg/kg	
04.2.2.4	Canned or bottled (pasteurized) or retort pouch vegetables and seaweeds	50,000	25,000	mg/kg	161
04.2.2.5	Vegetable, seaweed, and nut and seed purees and spreads	50,000	25,000	mg/kg	

04.2.2.6	Vegetable, seaweed, and nut and seed pulps and preparations	50,000	25,000	mg/kg	161
04.2.2.7	Fermented vegetable and seaweed products	50,000	25,000	mg/kg	161
04.2.2.8	Cooked or fried vegetables and seaweeds	50,000	25,000	mg/kg	161
05.1.2	Cocoa mixes (syrups)	50,000	25,000	mg/kg	
05.1.3	Cocoa-based spreads, including fillings	50,000	25,000	mg/kg	
05.1.4	Cocoa and chocolate products	50,000	25,000	mg/kg	183
05.1.5	Imitation chocolate, chocolate substitute products	50,000	25,000	mg/kg	
5.3	Chewing gum	20,000	10,000	mg/kg	
5.4	Decorations, toppings (non-fruit) and sweet sauces	50,000	25,000	mg/kg	
6.3	Breakfast cereals	50,000	25,000	mg/kg	189
06.4.3	Pre-cooked pastas and noodles and like products	50,000	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	50,000	25,000	mg/kg	
6.6	Batters	50,000	25,000	mg/kg	
6.7	Pre-cooked or processed rice products	50,000	25,000	mg/kg	
06.8.1	Soybean-based beverages	1,500	750	mg/kg	
06.8.8	Other soybean protein products	20,000	10,000	mg/kg	
07.1.2	Crackers, excluding sweet crackers	50,000	25,000	mg/kg	161
07.1.3	Other ordinary bakery products	50,000	25,000	mg/kg	161
07.1.4	Bread-type products	50,000	25,000	mg/kg	161
07.1.5	Steamed breads and buns	50,000	25,000	mg/kg	161
07.1.6	Mixes for bread and ordinary bakery wares	50,000	25,000	mg/kg	161
7.2	Fine bakery wares (sweet, salty, savory) and mixes	50,000	25,000	mg/kg	161
9.1	Fresh fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	4,16
9.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	

9.3	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	95
9.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	250	mg/kg	50
10.1	Fresh eggs	20,000	10,000	mg/kg	4
10.3	Preserved eggs, including alkaline, salted, and canned eggs	20,000	10,000	mg/kg	4
10.4	Egg-based desserts (e.g., custard)	20,000	10,000	mg/kg	
11.4	Other sugars and syrups for decoration or toppings	50,000	25,000	mg/kg	100
12.2.2	Seasonings and condiments	50,000	30,000	mg/kg	
12.3	Vinegars	1,000	500	mg/kg	78
12.4	Mustards	50,000	25,000	mg/kg	
12.5	Soups	20,000	12,500	mg/kg	
12.6	Sauces and like products	50,000	15,000	mg/kg	
12.7	Salads and sandwich spreads	50,000	25,000	mg/kg	89
12.9.2.1	Fermented soybean sauce	20,000	10,000	mg/kg	207
12.9.2.2	Non-fermented soybean sauce	1,500	750	mg/kg	
12.9.2.3	Other soybean sauces	20,000	15,000	mg/kg	
13.3	Dietetic foods intended for special medical purposes	20,000	10,000	mg/kg	
13.4	Dietetic formulae for slimming purposes and weight reduction	20,000	10,000	mg/kg	
13.5	Dietetic foods	20,000	10,000	mg/kg	
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	10,000	5,000	mg/kg	160,7
14.2.1	Beer and malt beverages	50,000	25,000	mg/kg	
14.2.2	Cider and perry	1,000	500	mg/kg	
14.2.3.3	Fortified grape wine, grape liquor wine, and sweet grape wine	50,000	25,000	mg/kg	
14.2.4	Wines (other than grape)	1,000	500	mg/kg	
14.2.5	Mead	1,000	500	mg/kg	
14.2.6	Distilled spirituous beverages containing more than 15% alcohol	50,000	25,000	mg/kg	
14.2.7	Aromatized alcoholic beverages	50,000	25,000	mg/kg	
15.0	Snack	10,000	5,000	mg/kg	

- Caramel IV – sulfite ammonia caramel (INS 150d)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	2,000	500	mg/kg	52
01.2.1	Fermented milks (plain)	150	75	mg/kg	12
01.3.2	Beverage whiteners	1,000	500	mg/kg	
01.4.4	Cream analogues	5,000	2,500	mg/kg	
01.5.2	Milk and cream powder analogues	5,000	2,500	mg/kg	
01.6.1	Unripened cheese	50,000	25,000	mg/kg	201
01.6.2.1	Ripened cheese, includes rind	50,000	25,000	mg/kg	201
01.6.2.2	Rind of ripened cheese	50,000	25,000	mg/kg	
01.6.4.2	Flavored processed cheese	50,000	25,000	mg/kg	72
01.6.5	Cheese analogues	50,000	25,000	mg/kg	201
02.2.2	Fat spreads, dairy fat spreads and blended spreads	500	250	mg/kg	214
2.4	Fat-based desserts	20,000	10,000	mg/kg	
04.1.2.3	Fruit in vinegar, oil, or brine	7,500	3,750	mg/kg	
04.1.2.4	Canned or bottled (pasteurized) fruit	7,500	3,750	mg/kg	
04.1.2.5	Jams, jellies, marmalades	1,500	750	mg/kg	
04.1.2.6	Fruit-based spreads	500	250	mg/kg	
04.1.2.7	Candied fruit	7,500	3,750	mg/kg	
04.1.2.8	Fruit preparations	7,500	3,750	mg/kg	182
04.1.2.9	Fruit-based desserts	7,500	3,750	mg/kg	
04.1.2.11	Fruit fillings for pastries	7,500	3,750	mg/kg	
04.2.2	Processed vegetables, seaweeds, and nuts and seeds	50,000	25,000	mg/kg	92,161
05.1.2	Cocoa mixes (syrops)	50,000	25,000	mg/kg	
05.1.3	Cocoa-based spreads, including fillings	50,000	25,000	mg/kg	

05.1.4	Cocoa and chocolate products	50,000	25,000	mg/kg	183
05.1.5	Imitation chocolate, chocolate substitute products	50,000	25,000	mg/kg	
5.3	Chewing gum	20,000	10,000	mg/kg	
5.4	Decorations, toppings (non-fruit) and sweet sauces	50,000	25,000	mg/kg	
6.3	Breakfast cereals	2,500	1,250	mg/kg	
06.4.2	Dried pastas and noodles and like products	50,000	25,000	mg/kg	211
06.4.3	Pre-cooked pastas and noodles and like products	50,000	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	2,500	1,250	mg/kg	
6.6	Batters	2,500	1,250	mg/kg	
6.7	Pre-cooked or processed rice products	2,500	1,250	mg/kg	
06.8.8	Other soybean protein products	20,000	10,000	mg/kg	
07.1.2	Crackers, excluding sweet crackers	50,000	25,000	mg/kg	161
07.1.3	Other ordinary bakery products	50,000	25,000	mg/kg	161
7.2	Fine bakery wares (sweet, salty, savory) and mixes	1,200	600	mg/kg	
9.2	Processed fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	95
9.3	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	95
9.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	30,000	15,000	mg/kg	95
10.1	Fresh eggs	20,000	10,000	mg/kg	4
10.2	Egg products	20,000	10,000	mg/kg	161
10.3	Preserved eggs, including alkaline, salted, and canned eggs	20,000	10,000	mg/kg	
10.4	Egg-based desserts (e.g., custard)	20,000	10,000	mg/kg	
11.6	Table-top sweeteners	1,200	600	mg/kg	213
12.2	Herbs, spices, seasonings and condiments	10,000	5,000	mg/kg	
12.3	Vinegars	50,000	25,000	mg/kg	
12.4	Mustards	50,000	25,000	mg/kg	

12.5	Soups	25,000	12,500	mg/kg	212
12.6	Sauces and like products	30,000	15,000	mg/kg	
12.7	Salads and sandwich spreads	50,000	25,000	mg/kg	
12.9.2.1	Fermented soybean sauce	60,000	15,000	mg/kg	
13.3	Dietetic foods intended for special medical purposes	20,000	10,000	mg/kg	
13.4	Dietetic formulae for slimming purposes and weight reduction	20,000	10,000	mg/kg	
13.5	Dietetic foods	20,000	10,000	mg/kg	
13.6	Food supplements	20,000	10,000	mg/kg	
14.1.4	Water-based flavored drinks	50,000	5,000	mg/kg	
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	10,000	5,000	mg/kg	7,127
14.2.1	Beer and malt beverages	50,000	25,000	mg/kg	
14.2.2	Cider and perry	1,000	500	mg/kg	
14.2.3.3	Fortified grape wine, grape liquor wine, and sweet grape wine	50,000	25,000	mg/kg	
14.2.4	Wines (other than grape)	1,000	500	mg/kg	
14.2.5	Mead	1,000	500	mg/kg	
14.2.6	Distilled spirituous beverages containing more than 15% alcohol	50,000	25,000	mg/kg	
14.2.7	Aromatized alcoholic beverages	50,000	25,000	mg/kg	
15.0	Snack	10,000	5,000	mg/kg	

- Iron oxides (INS 172 (i)-(iii))

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	20	Not Allow	mg/kg	
01.6.2.2	Rind of ripened cheese	100	Not Allow	mg/kg	
01.6.4	Processed cheese	50	Not Allow	mg/kg	
1.7	Dairy-based desserts	100	Not Allow	mg/kg	
2.4	Fat-based desserts	350	Not Allow		

				mg/kg	
3.0	Edible ices, including sherbet and sorbet	300	Not Allow	mg/kg	
04.1.1.2	Surface-treated fresh fruit	1,000	Not Allow	mg/kg	
04.1.2.4	Canned or bottled (pasteurized) fruit	300	Not Allow	mg/kg	
04.1.2.5	Jams, jellies, marmalades	200	Not Allow	mg/kg	
04.1.2.6	Fruit-based spreads	500	Not Allow	mg/kg	
04.1.2.7	Candied fruit	250	Not Allow	mg/kg	
04.1.2.9	Fruit-based desserts	200	Not Allow	mg/kg	
5.2	Confectionery including hard and soft candy, nougats, etc.	200	Not Allow	mg/kg	
5.3	Chewing gum	10,000	Not Allow	mg/kg	
6.3	Breakfast cereals	75	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	75	Not Allow	mg/kg	
7.2	Fine bakery wares (sweet, salty, savory) and mixes	100	Not Allow	mg/kg	
8.4	Edible casings (e.g., sausage casings)	1,000	Not Allow	mg/kg	
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	250	Not Allow	mg/kg	
09.3.3	Caviar, and other fish roe products	100	Not Allow	mg/kg	
09.3.4	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	50	Not Allow	mg/kg	
9.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	50	Not Allow	mg/kg	
10.1	Fresh eggs	GMP	Not Allow	mg/kg	
10.4	Egg-based desserts (e.g., custard)	150	Not Allow	mg/kg	
12.2.2	Seasonings and condiments	1,000	Not Allow	mg/kg	
12.5	Soups	100	Not Allow	mg/kg	
12.6	Sauces and like products	75	Not Allow	mg/kg	
13.6	Food supplements	7,500	1,000	mg/kg	3

14.1.4	Water-based flavored drinks	100	Not Allow	mg/kg	
15.1	Snacks - potato, cereal, flour or starch based	500	Not Allow	mg/kg	
15.2	Processed nuts, including coated nuts and nut mixtures	400	Not Allow	mg/kg	

- Riboflavins (INS 101 (i)-(iii))

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	300	Not Allow	mg/kg	
01.3.2	Beverage whiteners	300	Not Allow	mg/kg	
01.5.2	Milk and cream powder analogues	300	Not Allow	mg/kg	
01.6.1	Unripened cheese	300	100	mg/kg	
01.6.2.1	Ripened cheese, includes rind	300	100	mg/kg	
01.6.2.2	Rind of ripened cheese	300	100	mg/kg	
01.6.4	Processed cheese	300	100	mg/kg	
01.6.5	Cheese analogues	300	100	mg/kg	
1.7	Dairy-based desserts	300	Not Allow	mg/kg	
02.2.2	Fat spreads, dairy fat spreads and blended spreads	300	Not Allow	mg/kg	
2.3	Fat emulsions mainly of type oil-in-water	300	Not Allow	mg/kg	
2.4	Fat-based desserts	300	Not Allow	mg/kg	
3.0	Edible ices, including sherbet and sorbet	500	Not Allow	mg/kg	
04.1.1.2	Surface-treated fresh fruit	300	Not Allow	mg/kg	
04.1.2.4	Canned or bottled (pasteurized) fruit	300	70	mg/kg	
04.1.2.5	Jams, jellies, marmalades	200	70	mg/kg	
04.1.2.6	Fruit-based spreads	500	70	mg/kg	
04.1.2.7	Candied fruit	300	70	mg/kg	
04.1.2.8	Fruit preparations	300	70	mg/kg	182
04.1.2.9	Fruit-based desserts	300	70	mg/kg	
04.1.2.10	Fermented fruit products	500	70	mg/kg	
04.1.2.11	Fruit fillings for pastries	300	70	mg/kg	

04.2.1.2	Surface-treated fresh vegetables, seaweeds, and nuts and seeds	300	Not Allow	mg/kg	
04.2.2.3	Vegetables and seaweeds in vinegar, oil, brine, or soybean sauce	500	Not Allow	mg/kg	
04.2.2.6	Vegetable, seaweed, and nut and seed pulps and preparations	300	Not Allow	mg/kg	
04.2.2.7	Fermented vegetable and seaweed products	500	Not Allow	mg/kg	
05.1.5	Imitation chocolate, chocolate substitute products	1,000	100	mg/kg	
5.2	Confectionery including hard and soft candy, nougats, etc.	1,000	100	mg/kg	
5.3	Chewing gum	1,000	100	mg/kg	
5.4	Decorations, toppings (non-fruit) and sweet sauces	1,000	100	mg/kg	
6.3	Breakfast cereals	300	70	mg/kg	
06.4.3	Pre-cooked pastas and noodles and like products	300	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	300	70	mg/kg	
6.6	Batters	300	Not Allow	mg/kg	
06.8.1	Soybean-based beverages	50	Not Allow	mg/kg	
7.2	Fine bakery wares (sweet, salty, savory) and mixes	300	70	mg/kg	
8.2	Processed meat, poultry, and game products in whole pieces or cuts	1,000	Not Allow	mg/kg	
8.3	Processed comminuted meat, poultry, and game products	1,000	Not Allow	mg/kg	
8.4	Edible casings (e.g., sausage casings)	1,000	Not Allow	mg/kg	
09.2.1	Frozen fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	1,000	Not Allow	mg/kg	
09.2.2	Frozen battered fish, fish fillets, and fish products, including mollusks, crustaceans, and echinoderms	300	Not Allow	mg/kg	
09.2.3	Frozen minced and creamed fish products, including mollusks, crustaceans, and echinoderms	300	Not Allow	mg/kg	
09.2.4.1	Cooked fish and fish products	300	70	mg/kg	95
09.2.4.2	Cooked mollusks, crustaceans, and echinoderms	300	70	mg/kg	
09.2.4.3	Fried fish and fish products, including mollusks, crustaceans, and echinoderms	300	Not Allow		

				mg/kg	
09.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans, and echinoderms	300	Not Allow	mg/kg	
09.3.1	Fish and fish products, including mollusks, crustaceans, and echinoderms, marinated and/or in jelly	300	Not Allow	mg/kg	
09.3.2	Fish and fish products, including mollusks, crustaceans, and echinoderms, pickled and/or in brine	300	Not Allow	mg/kg	
09.3.3	Caviar, and other fish roe products	300	100	mg/kg	
09.3.4	Semi-preserved fish and fish products, including mollusks, crustaceans, and echinoderms (e.g., fish paste), excluding products of food categories 09.3.1 - 09.3.3	300	Not Allow	mg/kg	
9.4	Fully preserved, including canned or fermented fish and fish products, including mollusks, crustaceans, and echinoderms	500	Not Allow	mg/kg	
10.4	Egg-based desserts (e.g., custard)	300	70	mg/kg	
11.3	Preserved egg products	300	Not Allow	mg/kg	
11.4	Other sugars and syrups for decoration and toppings	300	70	mg/kg	
12.2.2	Seasonings and condiments	350	70	mg/kg	
12.4	Mustards	300	70	mg/kg	
12.5	Soups	200	70	mg/kg	344
12.6	Sauces and like products	350	70	mg/kg	
12.7	Salads and sandwich spreads	300	70	mg/kg	
13.3	Dietetic foods intended for special medical purposes	300	100	mg/kg	
13.4	Dietetic formulae for slimming purposes and weight reduction	300	100	mg/kg	
13.5	Dietetic foods	300	70	mg/kg	
14.1.4	Water-based flavored drinks	50	30	mg/kg	
15.1	Snacks - potato, cereal, flour or starch based	1,000	70	mg/kg	

15.2	Processed nuts, including coated nuts and nut mixtures	1,000	70	mg/kg	
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Other Food Additives:

- ASCORBYL ESTERS (INS 304-305)

Same as CODEX with additional note on number 15

- DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL (INS 472e)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	5,000	Not Allow	mg/kg	
01.5.1	Milk powder and cream powder (plain)	10,000	Not Allow	mg/kg	
1.7	Dairy-based desserts	10,000	Not Allow	mg/kg	
02.1.2	Vegetable oils and fats	10,000	Not Allow	mg/kg	
02.1.3	Lard, tallow, fish oil, and other animal fats	10,000	Not Allow	mg/kg	
02.2.2	Fat spreads, dairy fat spreads and blended spreads	10,000	Not Allow	mg/kg	
2.4	Fat-based desserts	5,000	Not Allow	mg/kg	
3.0	Edible ices, including sherbet and sorbet	1,000	Not Allow	mg/kg	
04.1.2.2	Dried fruit	10,000	Not Allow	mg/kg	
04.1.2.7	Candied fruit	1,000	Not Allow	mg/kg	
04.1.2.8	Fruit preparations	2,500	Not Allow	mg/kg	
04.1.2.9	Fruit-based desserts	2,500	Not Allow	mg/kg	
04.2.2.2	Dried vegetables, seaweeds, and nuts and seeds	10,000	Not Allow	mg/kg	
04.2.2.7	Fermented vegetable and seaweed products	2,500	Not Allow	mg/kg	
04.2.2.8	Cooked or fried vegetables and seaweeds	2,500	Not Allow	mg/kg	
6.2	Flours and starches	3,000	Not Allow	mg/kg	

06.4.2	Dried pastas and noodles and like products	5,000	Not Allow	mg/kg	
06.4.3	Pre-cooked pastas and noodles and like products	10,000	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	5,000	Not Allow	mg/kg	
10.4	Egg-based desserts (e.g., custard)	5,000	Not Allow	mg/kg	
12.5	Soups	5,000	Not Allow	mg/kg	
12.7	Salads and sandwich spreads	5,000	Not Allow	mg/kg	
14.1.4	Water-based flavored drinks	5,000	Not Allow	mg/kg	
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa	500	Not Allow	mg/kg	
15.1	Snacks - potato, cereal, flour or starch based	20,000	Not Allow	mg/kg	
15.2	Processed nuts, including coated nuts and nut mixtures	10,000	Not Allow	mg/kg	

- PROPYLENE GLYCOL ESTERS OF FATTY ACIDS (INS 477)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	5,000	Not Allow	mg/kg	
01.3.2	Beverage whiteners	1,000	Not Allow	mg/kg	
01.7	Dairy-based desserts	5,000	Not Allow	mg/kg	
02.1.2	Vegetable oils and fats	10,000	Not Allow	mg/kg	
02.1.3	Lard, tallow, fish oil, and other animal fats	10,000	Not Allow	mg/kg	
02.2.2	Fat spreads, dairy fat spreads and blended spreads	20,000	10,000	mg/kg	
2.4	Fat-based desserts	40,000	Not Allow	mg/kg	
3.0	Edible ices, including sherbet and sorbet	5,000	Not Allow	mg/kg	
04.1.2.8	Fruit preparations	40,000	Not Allow	mg/kg	
04.1.2.9	Fruit-based desserts	40,000	Not Allow	mg/kg	

				mg/kg	
05.1.1	Cocoa mixes (powders) and cocoa mass/cake	5,000	Not Allow	mg/kg	
06.4.3	Pre-cooked pastas and noodles and like products	5,000	Not Allow	mg/kg	
6.5	Cereal and starch based desserts	40,000	Not Allow	mg/kg	
7.0	Bakery wares	15,000	5,000	mg/kg	11,72
10.4	Egg-based desserts (e.g., custard)	40,000	Not Allow	mg/kg	
14.1.4	Water-based flavored drinks	500	Not Allow	mg/kg	

- SUCROGLYCERIDES (INS 474)

Number	Food Category	Max Level		Units	Notes
		CODEX	Revised Thai FDA		
01.1.2	Dairy-based drinks, flavored and/or fermented (e.g., chocolate milk, cocoa, eggnog, drinking yoghurt, whey-based drinks)	5,000	Not Allow	mg/kg	
07.2	Fine bakery wares (sweet, salty, savory) and mixes	10,000	5,000	mg/kg	

End of the Report.