

Voluntary Report – Voluntary - Public Distribution

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Report Name: Vietnam Extends the Lists of Permissible Food Additives and Flavors

Country: Vietnam

Post: Hanoi

Report Category: Sanitary/Phytosanitary/Food Safety

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Report Highlights:

Vietnam's Ministry of Health (MOH) issued Circular 17/2023 amending several regulations on food additives, flavors, and processing aids. This Circular includes the adoption of the list of food additives and their maximum use levels (MLs) provided in the latest version of the General Standard for Food Additives (GSFA) CODEX STAN 192-1995. In addition, Vietnam allows the use of flavors that have been evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) or recognized as GRAS by the American Flavor and Extract Manufacturers Association (FEMA) or approved by the European Union. Vietnam also renews the list of processing aids allowed for food use. Circular 17/2023 took effect on November 9, 2023.

Summary

On September 25, 2023, MOH issued Circular 17/2023 amending several regulations on food safety in Vietnam. This includes the amendment of MOH's Circular 24/2019 on food additives and the amendment of Part 7 of MOH's Decision 46/2007 regarding the list of processing aids allowed for food use. Circular 17/2023 took effect on November 9, 2023.

Vietnam first notified the amendment of the Food Additives Circular to the World Trade Organization (WTO) on August 12, 2021, as G/SPS/N/VNM/123. Vietnam re-notified this amendment as G/SPS/N/VNM/140 on July 29, 2022.

Below are highlights of Circular 17/2023.

Renewal of the Lists of Permitted Food Additives and Maximum Use Levels (MLs) in Food

According to MOH's Circular 24/2019 ([GAIN Report VM2019-0066](#)), the lists of food additives and their MLs allowed for use in Vietnam include:

- Appendix 2A of Circular 24/2019 - The List of Food Additives Permitted for Use in Certain Food Categories with the MLs adopted by Codex STAN 192-1995.
- Appendix 3 of Circular 24/2019 - The List of Food Additives Permitted for Use in Food in accordance with Good Manufacturing Practices (GMP).
- Appendix 2B of Circular 24/2019 - The List of Food Additives and their MLs which are not adopted under Codex STAN 192-1995.

Circular 17/2023 provides the following amendments to Circular 24/2019:

- Article 1.3 of Circular 17/2023 provides the renewal of Appendix 2A and Appendix 3 of Circular 24/2019 in accordance with the latest Codex GSFA: "Appendix 2A and Appendix 3 are updated in accordance with Table One and Table Three of the latest General Standard for Food Additives (CODEX STAN 192-1995) of the Codex Alimentarius Commission (CAC)".
- Article 1.4 of Circular 17/2023 adds 18 food additives permitted for use in certain food products (dietary foods for special medical purposes, supplemental foods, shortening, meat and processed meat, etc) and their MLs to Appendix 2B of Circular 24/2019 – the List of Food Additives and their MLs which are not adopted under Codex STAN 192-1995.
- Article 1.5 of Circular 17/2023 allows an update of Appendix 4 of Circular 24/2019 on the description and listing of food categories in accordance with Annex B of the latest Codex GSFA.

Extending the List of Flavors Allowed for Food Use

Article 1.2 of Circular 17/2023 extends the lists of flavors allowed for food use in Vietnam, including those in one of the following lists:

- Flavors have been evaluated by JECFA and determined to be safe at expected intakes or acceptable daily intakes (ADI)
- Flavors generally recognized as safe (GRAS) issued by the American Flavor and Extract Manufacturers Association (FEMA)
- Flavors for use in foods in the European Union issued by the Parliament and Council of the European Union.”

Renewal of the List of Processing Aids Allowed for Food Use

Article 2 of Circular 17/2023 provides the renewed List of Processing Aids allowed for use in food production. The renewed List is detailed in Appendix 2 of Circular 17/2023. Accordingly, Vietnam’s MOH allows the use of 221 processing aids with relevant chemical names. Other processing aids are allowed for use once they are determined to be safe in accordance with Point 3.3 and Point 3.4 of Item 3 Principles in Safe Use of Processing Aids provided in Vietnam Standard 11429:2016 (CAC/GL 75 :2010).

Vietnam Food Administration (VFA) responsible for guiding databases of food additives and flavors

According to Article 1.6 of Circular 17/2023, VFA continues to be assigned by MOH as the responsible agency to provide guidance for food industries in Vietnam in searching Codex regulations on food additives and the databases of food flavors of JECFA, FEMA and EU.

Circular 17/2023 (in Vietnamese) can be accessed here: <https://vfa.gov.vn/chi-dao-dieu-hanh/ban-hanh-thong-tu-so-172023tt-byt-sua-doi-bo-sung-va-bai-bo-cac-van-ban-quy-pham-phap-luat-ve-an-toan-thuc-pham-do-bo-truong-bo-y-te-ban-hanh.html>

Should U.S. exporters have any questions or need clarification, please contact aghanoi@usda.gov

Attachments:

[20230926 Circular No. 17 MOH on food safety translated.doc](#)