

European Union Comments
CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-first Session

Jinan, China, 25-29 March 2019

AGENDA ITEM 5(c)

**DISCUSSION PAPER ON THE USE OF NITRATES (INS 251, 252) AND
NITRITES (INS 249, 250)**

(CX/FA 19/51/9)

European Union Competence
European Union Vote

The European Union (EU) would like to thank Codex Members and Observers for their contribution to the work of the electronic Working Group and the JECFA FAO/WHO secretariats for publishing the call for data on natural occurrence of nitrates and nitrites and enabling data collection via the GEMS/Food database.

The EU has the following comments:

Expressing the use levels

Based on the scientific evidence available indicating that the ingoing amount of nitrite, rather than the residual amount, contributes to the inhibitory activity against *C. botulinum*¹ and that exposure to preformed nitrosamines should be minimized by appropriate practices such as lowering the levels of nitrate and nitrite added to foods to the levels necessary for preservative effect², the regulatory approach based on the ingoing amount should be preferred. However, for purposes of Codex standards, which are intended for international food trade, and taking into account challenges in controlling the ingoing amount for some traditional products³, the EU is of the view that the GSFA provisions should include both ingoing and residual maximum use levels.

Safety considerations

The EU is well aware of the exposure of the EU population to nitrates, nitrites and nitrosamines (overall exposure and exposure due to food additive uses) based on the recent EFSA opinions⁴. However, no specific EFSA's opinion has been issued for the efficacy of the use of certain additives (e.g. ascorbic acid) in conjunction with nitrates and nitrites to reduce nitrosamine formation. Therefore, the EU would welcome more information from those countries having specific measures in place or a further scientific advice on this matter. The EU is also concerned about the lack of references to studies which would demonstrate the effectiveness of the levels reported in Table 2 and 3 of CX/FA 19/51/9.

Recommendations

The EU takes note that the aim of the current work was to develop an inventory of data with a view to consulting with JECFA and CCFA regarding next steps how to approach this complex matter.

¹ EFSA Journal (2003) 14, 1-31

² EFSA Journal 2010; 8(5):1538

³ Traditional immersion and/or dry cured products or compound products where the curing solution is injected into the product prior to cooking

⁴ EFSA Journal 2017;15(6):4786 and EFSA Journal 2017;15(6):4787

Therefore, it might be premature that CCFA51 decides on the recommendations outlined in the paper. Nevertheless, the EU would like to offer its view on the recommendations as follows:

Recommendation 1

The EU considers that the GSFA provisions should include both ingoing and residual maximum use levels.

Recommendation 2

The EU would not object if the Committee considers that there is a need for further scientific advice.