

03/02/2014

**European Union Comments**  
**CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS**  
**Thirty-third Session**  
**Bergen, Norway, 17 – 21 February 2014**

**AGENDA ITEM 2 a)**

**MATTERS REFERRED TO THE COMMITTEE BY THE CODEX  
ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES**

**Committee on Food Additives (CCFA) (45th Session)**

*European Union Competence.*

*European Union Vote.*

The European Union (EU) would like to submit the following comments:

**Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (paras 13-14)**

**Para 13:** The EU could support the replacement of the secondary additives used in flavourings (i.e. INS 1400 dextrin, roasted starch and INS 433 polyoxyethylene (20) sorbitan monooleate) by a reference to the *Guidelines for the Use of Flavourings* which should be applicable only to the section for smoked-flavoured fish.

**Para 14:** As regards the CCFA recommendation to permit not only tartaric acid but all tartrates as listed in GSFA in the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish, the EU would like to note that whilst the GSFA lists the whole group of tartrates (INS Numbers 334; 335(i),(ii); 336(i),(ii); 337) in reality only INS 334 tartaric acid is permitted for use according to the adopted GSFA provisions (see note 128 of the GSFA associated with the provisions for tartrates). However, the EU does not have any specific comments in support or against the recommendation proposed.

**Draft Standard for Raw, Fresh and Quick Frozen Scallop Products**

The EU can accept the use of phosphates in Quick Frozen Scallop Meat and Roe-on Scallops at 2.200 mg/kg expressed as phosphorous.

**Standard for quick frozen fish sticks (fish fingers), fish portions and fish filets breaded or in batter**

The EU would like to note that the issue of revision of the provision for sodium aluminium phosphate (INS 541) in CS 166-1989 was raised and discussed also by the electronic Working Group on the Food Additive Provisions in Adopted Standards – see CX/FFP 14/33/11, page 4.

The EU is of the view that in order to reduce the exposure to aluminium based on the recommendation of the 67<sup>th</sup> JECFA meeting taking into account the revised PTWI of 2 mg/kg bw (74<sup>th</sup> JECFA meeting) and having regard that alternative raising agents are permitted in the standard, the provision for INS 541 sodium aluminium phosphate can be removed from the standard.