

17/06/2013

## European Union Comments

### CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

#### CIRCULAR LETTER 2012/31-FFP – POINT 7:

#### DRAFT SECTION 4: FOOD ADDITIVES IN THE DRAFT STANDARD FOR SMOKED FISH, SMOKE-FLAVOURED FISH AND SMOKE-DRIED FISH

*European Union Competence.*

*European Union Vote.*

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

The EU would welcome a clarification on the technological need for using a blue colour - **brilliant blue FCF (INS 133)** in smoked fish. Without a proper technological justification the EU does not support the use of this colour in smoked/smoked-flavoured fish.

Regarding **INS 150a Caramel I** – plain caramel, the EU supposes that this food colour is intended to be used in spice seasoning for smoked fish. The EU fully concurs with the CCFFP's view that if additives were used in spices, there was no need to list them if they had no technological function in the end product (REP 13/FFP, para 35).

Regarding the use of **sodium nitrite**, the EU would like to reiterate the safety concerns. According to the JECFA's evaluation of nitrate and nitrite (44<sup>th</sup> report, WHO Technical Report Series, p. 30) *nitrosamines can be formed in food under suitable conditions as a consequence of chemical reactions between nitrosatable precursors in food (e.g. amines) and nitrosating agents (e.g. nitrite and nitrogen oxides)*. It is well recognised that fish may contain high levels of secondary amines and therefore there is a high potential of nitrosamine formation.

Moreover, according to JECFA (44<sup>th</sup> report, WHO Technical Report Series, p. 30) *several studies showed that food preparation techniques such as malting, **smoking**, drying and broiling of meat and **fish products**, can, under certain conditions, promote the formation of nitrosamines*.

Since the prevention of *Clostridium botulinum* toxin formation in smoked fish is sufficiently guaranteed by a variety of measures provided for in part 6.5 and annex 2 of the draft standard, the EU cannot see any benefit of using sodium nitrite in smoked/smoked-flavoured fish and therefore, taking into account the safety aspects, does not support this use.