

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
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Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4

CX/FFP 14/33/6 Add.1
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-third Session

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STANDARD FOR SMOKED FISH, SMOKE-FLAVOURED FISH AND SMOKE-DRIED FISH SECTION 4 FOOD ADDITIVES (At Step 6 of the Procedure)

Comments submitted by African Union Canada, Ghana, Kenya and Philippines

AU

Brilliant blue FCF

The AU observers that there is insufficient scientific bases to support the use of brilliant blue and therefore as a precautionary measure will support the non-use of the additive. Brilliant blue should not be used as an additive in Smoked Fish, Smoked-Flavoured Fish and Smoke-Dried Fish.

Caramel 1

The AU does not support the inclusion of caramel 1 in the standard since its already in the list of approved additives. Caramel 1 should not be included in the Standard.

Sodium nitrite

AU emphasizes the use of GHPs rather than the use of sodium nitrite to prevent or control the growth of *Clostridium botulinum* and toxin formation. GHPs should be advocated for.

Tartaric acid

The AU supports the recommendation of the CCFA in the use of Tartaric acid L+ (334). AU supports that all tartrates as listed in the GSFA “tartrates” be permitted.

Sodium isocarbonate

AU supports the recommendation of CCFA in the use of the name Sodium isocarbonate instead of INS 316 to be consistent with CAC/GL 36-1989.

Smoke flavourings

The AU position is that smoked flavourings used in smoked flavoured fish covered by this Standard should comply with the guidelines of the use of flavourings CAC/GL 66-2008.

The AU supports the recommendations of CCFA that there is no need for permission for dextrans and roasted starch in this Standard.

CANADA

GENERAL COMMENTS

Canada continues to support the advancement of the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried fish in particular section 4 on food additives.

SECTION 4 - FOOD ADDITIVES

Section 4.1 Smoked Fish

Brilliant Blue FCF: Canada does not support inclusion.

Reason: There is no technological justification for its use.

Caramel 1 – plain caramel: Canada does not support inclusion.

Reason: There is no technological justification for its use.

Sodium nitrite: Canada does not support inclusion.

Reason: There are food safety concerns with the use of nitrites as outlined in the EWG report, i.e. the potential for the nitrites to combine with the amines in fish proteins to produce carcinogenic nitrosamines. Further, other control measures to prevent the growth of *Clostridium botulinum* and toxin formation are available and in use by countries such as Canada. Some of these controls include, limiting the refrigerated shelf-life, frozen storage and packaging refrigerated products in an oxygen-permeable membrane.

Sunset Yellow FCF

Canada has reservations with the provision of Sunset Yellow FCF in the GSFA in smoke fish and smoke-flavoured fish. Canada suggests further discussions on the ADI level as Canada and other countries have ADI levels much lower than what is prescribed in the GSFA.

Section 4.2 Smoke-Flavoured Fish

Canada does not support the inclusion of Brilliant Blue FCF and Caramel 1 – plain caramel as well as Sodium nitrite in smoke-flavoured fish for the same reason stated above.

Recommendations from the Codex Committee on Food Additives (CCFA) in regards to several provisions in the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish.

Section 4.2 Smoke-Flavoured Fish

Dextrin, roasted starch (INS 1400) and polyoxyethylene (20) sorbitan monooleate (INS 433)

CCFA recommended to CCFFP to consider whether these provisions could be replaced by a reference to the *Guidelines for the Use of Flavourings (CAC/GL 66-2008)* as these additives were used in flavourings and have no technological function in the final product.

Comment: Canada supports CCFA's recommendation since these additives in flavorings have no technological function in the final product.

Canada proposes the following wording: **Smoke flavourings used in smoke-flavoured fish should meet the Guidelines for the Use of Flavourings (CAC/GL 66-2008).**

GHANA

Colour: Brilliant Blue FCF (133), Maximum Level 100mg/kg

Comment:

Ghana would be grateful if further clarification/justification is provided on the technological need for using Brilliant Blue FCF (INS 133) in smoked/ smoke-flavoured fish/smoke-dried fish.

Colour: Caramel 1- plain caramel (150a), Level GMP

Comment:

We support the use of Caramel.

Reason: The use of caramel is permitted in Ghana's legislation for smoked fish, smoke- flavoured fish and smoke- dried fish.

Preservative (for reduced oxygen packaged products only): Sodium nitrite (250), Maximum level 200 mg/kg

Ghana does not support the use of the preservative, Sodium nitrite (250) in smoked fish, smoke- flavoured fish and smoke-dried fish. The use of Sodium nitrite can cause the formation of nitrosamines in smoked fish.

KENYA

Kenya would like to emphasise on clause 4 on food additives which is yet to be developed not to include any food additive. Kenya smoke fish for preservation and flavouring purposes and does not use any additives on such products.

4. FOOD ADDITIVES**Comment:**

We propose that if at all the food additives will be used in these products then it should be in accordance to Stan 311: 2013: STANDARD FOR SMOKED FISH, SMOKE-FLAVOURED FISH AND SMOKED DRIED FISH

PHILIPPINES**General Comments:**

The Philippines supports the inclusion of Brilliant Blue FCF, Caramel 1- plain caramel and Sodium Nitrite as additives for use in Smoked Fish and Smoked-Flavoured Fish. In the Philippine's standard for smoked fish, sodium/potassium nitrite is permitted as a preservative at a maximum level of 134mg/kg (PNS/FDA 27:2010).