

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5(c)

CRD06

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

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

Comments of the joint FAO/WHO JECFA Secretariat

The joint FAO/WHO JECFA Secretariat would like to thank the European Union and the Netherlands for chairing the EWG on the use of nitrates and nitrites and thank the chairs and its members for this important work and the well-crafted summary document (CX/FA 18/50/9). In an effort to aid the deliberation of the Codex Committee for Food Additives at its 50th meeting, the joint FAO/WHO JECFA secretariat would like to provide the following additional views.

A formal risk assessment will be hampered by paucity of data

To answer some of the questions for which the need of scientific advice is considered, the joint FAO/WHO JECFA secretariat would expect the following currently unmet need for globally relevant data to present itself:

1. Amounts of nitrites and nitrates used in production of food items
2. Amounts of residual nitrites and nitrates, as well as amounts of nitrosamines present in food at the time of consumption
3. Food consumption data specific for foods treated with nitrates and nitrites
4. Total diet study and food consumption data for other sources of nitrates
5. Sufficient toxicokinetics/toxicodynamics data to establish the level of endogenous formation of nitrosamines

For questions that aim at a comparative risk assessment for the use of nitrates/nitrites and alternative technology, it would be necessary to establish a detailed quantitative understanding of mechanism that infers the desired benefits from the addition of nitrite and nitrates as well as any alternative technology (e.g., quant. microbiological models) individually for each of the technological function under consideration, e.g., preservation, colour retention.

This approach would results in sufficient data that would allow the comparative risk assessment of current practices and any replacement techniques that are to be considered.

Currently only few of the above data are available to the joint FAO/WHO JECFA secretariat and it unlikely that all data needs could be met with sufficient global coverage.

Step-wise approach

In this context, the joint FAO/WHO JECFA secretariat would like to offer to the Committee to explore an alternative approach and addressing the problems in a step-wise manner. It might be feasible to consider:

- Developing an inventory on the available data necessary for a formal risk assessment or risk-benefit analysis with the aim to allow member countries and stakeholders to develop focused actions to fill data gaps
- Considering risk management options as an alternative to risk assessment, or an interim measure until a formal risk assessment can takes place.

A feasible mechanism for the Committee to collect this information and prepare a next discussion paper and/or recommendation for future deliberations of the committee would be to create an electronic working group, with the option for physical meetings, to collect from its members and stakeholder an inventory of:

1. Current food related risk management approaches by regulatory agencies of Codex members
2. Already existing knowledge and data from its member states with regard to items 1-5 above
3. Existing knowledge about comparative efficacy of nitrites/nitrates and possible alternative technologies from observers and members states

The joint FAO/WHO JECFA secretariat believes that such an inventory, would provide a suitable starting point for the Committee to make an informed decision what type of scientific advice, risk/benefit or other consideration it needs to ask and where the committee can already develop risk management decisions.