



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

Thirty-second Session

Bali, Indonesia

1 – 5 October 2012

**DRAFT STANDARD FOR SMOKED FISH, SMOKE-FLAVOURED FISH AND SMOKE-DRIED
FISH
SECTION 4 FOOD ADDITIVES**

**COMMENTS AT STEP 6
(Canada, USA, IFAC, IOFI)**

CANADA

GENERAL COMMENTS

Canada continues to support the advancement of the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried fish, recognizing that committee discussion and amendments to Section 4 will be necessary.

SECTION 4 - FOOD ADDITIVES

Revise to Read:

Table - first section (on 'Smoked Fish')

* Rows 10, 16, 21, and 22: remove square brackets

* Row 20: [250]—[Sodim nitrite]—[200mg/kg]

Table - 2nd section (on 'Smoke-Flavoured Fish')

* Rows 11, 16, 22, 23, and 24: remove square brackets

Table - 3rd section (on 'Smoke-Dried Fish')

* Row 1: ~~No additives are permitted in smoke-dried fish~~ **[All Sorbates listed in the GFSA for food category 9.2.4.1. 1000 mg/kg as sorbic acid]**

Reason:

With the exception of the preservative sodium nitrite, Canada supports the proposed food additives for smoked fish and smoke-flavoured fish that are listed in Appendix I of the EWG report (CX/FFP 12/32/3). These additives, including those in square brackets, are widely used in foods and generally considered as safe.

Canada opposes the use of sodium nitrite in smoked fish for the food safety reasons described in the EWG report, i.e. the potential for the nitrites to combine with the amines in fish proteins to produce carcinogenic nitrosamines. Further, there are other options to control the growth of *Clostridium botulinum* and toxin formation. Some of these controls include storing the product in a frozen state, or packaging refrigerated products in an oxygen-permeable membrane

With respect to the suggested edit to the 3rd section (on 'Smoke-Dried Fish'), Canada would welcome a discussion on amending Appendix I to permit sorbates in smoke-dried fish, as currently is shown for smoked

fish and smoke-flavoured fish. For smoked-dried fish, Canada notes that the EWG report describes (in general comments, point #2) that “*We assumed that ‘smoked-dried fish’ was intended to cover the traditional product and required no additives.*” As a result, Appendix I of the report shows that “*no additives are permitted in smoke-dried fish*”. In Canada, Sorbic acid (or its salts) is permitted as a preservative in dried fish (that has been smoked or salted) at a maximum level of use of 1000 mg/kg as sorbic acid. It has been evaluated as effective and safe at this level. Canada welcomes a discussion on this matter, specifically the prevalence and justification of use for this preservative in this type of product, as well as any views on a maximum level.

UNITED STATES OF AMERICA

We support the proposed additive provisions with brackets removed. More investigative work may be needed to justify some of the provisions. The scope of the Standard regarding seasonings and other ingredients needs clarification in order to determine if certain additive provisions should be included.

Our comments are listed by the item number in the Electronic Working Group (EWG) Report.

General Comments, EWG #1

A food’s ingredients characterize standardized products, and CCFFP is required to assure that additive ingredients are justified and appropriate for the standardized food. Members should consult with fish processors and product experts to determine technological and fair trade justification for proposed additive provisions.

The following additives, which have adopted provisions in the General Standard for Food Additives for non-standardized smoked fishery products in food category 09.2.5, were not included in the Draft Provisions because the EWG did not support them as technologically justified and/or appropriate for fair trade for the standardized products covered by the Draft Smoked Fish Standard. CCFFP should recognize the exclusion of these additives when reviewing the Proposed Provisions. The Committee may wish to list excluded GSFA additive provisions in the Standard as advised by the Secretariat. Any other proposals applicable to the Standard should be submitted to the CCFFP for consideration following Codex Procedure.

Antioxidant

Propyl gallate

Sulfites

Color

Canthaxanthin

Caramel III – ammonia caramel

Caramel IV (For use in surimi and fish roe products only)

Carmines

Carotenoids (For use in surimi and fish roe products only)

beta-Carotenes, vegetable

Chlorophylls and chlorophyllins, copper complexes

Fast Green FCF

Grape skin extract

Indigotine (Indigo carmine)

Iron oxides

Ponceau 4R (Cochineal red A)

Riboflavins

Preservative

Butylated hydroxyanisole (BHA)

Butylated hydroxytoluene (BHT)

Sulfites

Flavor enhancer or Sweetener

Acesulfame potassium (For use in sweet and sour products only)

Aspartame (For use in sweet and sour products only)

Acidity Regulators and Antioxidants, EWG #4

The United States supports evaluating additives on a case-by-case basis because they may impart different qualities to foods, and because many additives have multiple technological purposes, some of which are not permitted in the commodity standard or may mislead the consumer.

Sodium erythorbate. We support the inclusion of sodium erythorbate for use as an antioxidant. Its function as an antioxidant is important because cold smoked salmon can have quite a high level of saturated oils, and because it is commonly frozen during distribution and storage before thawing for retail sale.

Carriers, EWG #5

We note that carriers may be present at low levels and may not serve a technological function in the final product, and therefore may not be required to be listed on the label. However, some producers may list them on the label anyway, in which case it may be reasonable to include a related provision in the product standard.

Colours, EWG #10

Caramel 1. We recommend removing the brackets and retaining caramel 1 if spice seasoning mix is allowed in the product. Unlike the other caramel colors, caramel 1 is listed in the GSFA as safe in foods generally when used under good manufacturing practices. It is a component of seasoning mixes, but is intended to impart color to the final product.

We agree that seasoned products do not appear to be allowed within the scope of the Draft Standard. A variety of smoked products contain sugar, spices, and other flavorings used in brines, rubs, and smoke flavor blends. Are these “specialty products” that are excluded in the Scope of the Standard? If CCFFP wishes to permit (or exclude) seasonings, flavors (other than smoke flavors), or any other ingredients, the Draft Standard should be amended to clarify the scope and product descriptions.

Preservatives, EWG #11

We agree that the justification for the use of preservatives in products undergoing a preservation process is limited, and we only support the use of specific preservatives with a demonstrated need in certain smoked products.

Benzoates: We recommend removing the brackets and retaining benzoates “**for cold smoked, or lightly smoked/salted products only.**” Benzoates have long been used in kippered, gravlax, cold smoked fish as preservatives, because these are mild cure, mild smoked products that spoil more rapidly.

Sorbates: Sorbates are used as a mold inhibitor in seasoning mixes used on smoked fish, for example fish jerky mix. Their inclusion depends on clarification of the scope of the Draft Smoked Fish Standard (See EWG #10 above).

We note that an additive used to preserve a seasoning ingredient may not serve a technological function in the final product, and therefore may not be required to be listed on the label. However, some producers may list the additive on the label anyway, in which case it may be reasonable to include a related provision in the product standard (See comment for Carriers).

Preservatives, EWG #12

Sodium nitrite: We recommend removing the brackets and retaining sodium nitrite. It is widely used in vacuum packaged hot and cold smoked fish to retard *Clostridium botulinum* growth and toxin formation.

The limitation for “**reduced oxygen packaged products only**” should only apply to sodium nitrite because that is the only preservative generally recognized to help control *Clostridium botulinum*, which grows in a reduced oxygen environment. Other preservatives used to generally retard spoilage (i.e., benzoates) should not have this limitation.

INTERNATIONAL FOOD ADDITIVES COUNCIL (IFAC)

We continue to believe the standard for smoked fish should follow the General Standard for Food Additives (GFSA) for food category 09.2.5 – “Smoked, dried, fermented, and/or salted fish and fish products, including molluscs, crustaceans, and echinoderms.” Phosphates were just approved for use in this category at the recent Codex Alimentarius Commission (CAC) meeting for use in category 09.3.1 at a maximum level of 2200 mg/kg. We believe that phosphates should be included in the standard for smoked fish.

INTERNATIONAL ORGANIZATION OF THE FLAVOR INDUSTRY (IOFI)

In response to the invitation to submit comments on the DRAFT Section 4 Food Additives of the “Draft Standard for Smoked Fish, **Smoke-Flavoured Fish** and Smoke-Dried Fish”, IOFI wishes to draw the attention of the CCFFP on the need to insert provisions for allowing the use of (smoke) flavourings in **Smoke-Flavoured Fish**.

Such provisions have to be listed in the Food Additives Section in conformity with the “Format for Codex Commodity Standards”, provided in the Procedural Manual of the Codex Alimentarius Commission (See Update to the 20th Edition, page 2).

Therefore, IOFI strongly recommends inserting permission for the use of (smoke) flavourings in the Food Additives Section as follows:

Smoke-Flavoured Fish

Acidity Regulator

....

Antioxidant

.....

[Carrier]

....

Colour

....

Emulsifier

....

Preservative

....

(Smoke) Flavourings

The flavourings used in smoke-flavoured fish covered by this standard should comply with the Guidelines for the use of flavourings (CAC/GL 66-2008).