



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Forty-Ninth Session

Macao SAR, China, 20-24 March 2017

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

#### Comments of Kenya, Philippines and Nicaragua

##### Kenya

Kenya comments the Netherlands for a well prepared background discussion paper in regard to these food additives

Issue: Recommendation 1 and 2 of proposing a request to JECFA to assist in both ingoing/residual amount as well as risk benefit analysis of nitrates and nitrates

Comment: Kenya supports both recommendations

Rationale: Despite there being no a viable option to the additives, there is need to clarify on the best way to determine the use level as well as quantifying the benefits and potential risks associated with the use of the food additives.

##### Philippines

The Philippines currently allows use of Nitrites/Nitrates in the Philippines. Nitrate/ Nitrite are known to have played a very important role in elimination clostridium botulism in a tropical country like Philippines. The Philippine therefore supports the issues around the possible formation of nitrosamines and the inhibitory activity of Clostridium Botulism.

##### Recommendation 1

Philippine supports the recommendation to consider requesting JECFA for an advice as regards the aspect of the ingoing and residual amounts in relation to its appropriateness for control purposes, preserving effect and nitrosamine formation.

##### Recommendation 2

Philippines supports the recommendation to consider requesting JECFA for an advice as regards a risk-benefit analysis, weighing the benefits of use of nitrites ad nitrates against their risks.

##### Recommendation 3

Philippine supports the recommendation to consider the appropriate use and use levels taking account the balance between the benefits & risks, the existence or non-existence of effective alternatives, as well as the best expressions of Maximum Use Levels either ingoing or residual.

##### Nicaragua

#### (i) Comentarios generales

CODEX Nicaragua agradece a los países bajos por la elaboración del documento y por brindarnos la oportunidad de presentar observaciones.

#### (ii) Comentarios específicos

Nicaragua considera oportuno que se realice una actualización al estudio realizado por JECFA, respecto al documento sobre la existencia alternativa para sustituir el uso de nitratos y nitritos; en materia de inocuidad microbiológica, sabor y aroma. Es pertinente contar con las evidencias científicas para determinar la necesidad del uso de nitritos y nitratos, tomando en cuenta la existencia de otras alternativas de aditivos y procesos tecnológicos equivalentes (implementación de Sistemas de BPM, HACCP, entre otros)

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De igual manera, se recomienda que la expresión de dosis máxima de uso se utilice tanto para cantidad añadida como para cantidad residual; como parte del control de producción y protección a la salud de los consumidores.