



Brussels,  
MARE/C3/NG/ae

**Subject: MAC Recommendation on Maximum Sulphites Levels for Crustaceans**

Dear Mr. Pastoor,

Thank you for your recommendation on behalf of the Market Advisory Council concerning a request to modify the current regulatory maximum limits of sulphites in Shrimps and Norway Lobster (Families Penaeidae, Solenoceridae and Aristeidae and Nephropidae)<sup>1</sup>, which are currently regulated by Regulation (EC) No 1333/2008 on food additives<sup>2</sup>.

In June 2016, the European Food Safety Authority (EFSA) completed the re-evaluation of the safety of sulphur dioxide (E 220), sodium sulphite (E 221), sodium bisulphite (E 222), sodium metabisulphite (E 223), potassium metabisulphite (E 224), calcium sulphite (E 226), calcium bisulphite (E 227) and potassium bisulphite (E 228) as food additives, in accordance with Regulation (EC) No 1333/2008 on food additives and of Regulation (EC) No 257/2010 setting up a programme for the re-evaluation of approved food additives.

EFSA noted several uncertainties and limitations in the database and concluded that the current group acceptable daily intake (ADI) of 0.7 mg SO<sub>2</sub> equivalent/kg body weight per day would remain adequate but should be considered temporary while the database was improved. EFSA recommended that additional studies should be performed and the database and the temporary group ADI should be re-evaluated. EFSA noted that the recommended studies could require five years for completion. Consequently, the European Commission issued in October 2016 a call for data requesting business operators to submit data addressing the conclusions from the re-evaluation of the safety of sulphur dioxide-sulphites (E 220–228) as food additives and the recommendations made by EFSA. In February 2020, business operators completed the submission of data in reply to that call. Therefore, the European Commission requested EFSA, in accordance with Article 29(1)(a) of Regulation (EC) No 178/2002, to re-evaluate the database and the temporary group ADI for the food additives sulphur dioxide-sulphites (E 220–228),

---

<sup>1</sup> Ref Ares (2022)5 400992

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1333-20210808>

Mr. Guus Pastoor  
Chairman  
Market Advisory Council  
bestuur@visfederatie.nl  
rue de la Science, 10  
B-1000 Brussels  
BELGIUM

and to issue an updated scientific opinion on the safety of sulphur dioxide–sulphites (E 220– 228) as food additives.

Given that EFSA is currently re-evaluating the use of sulphites as food additives, the Commission services cannot propose an amendment to the provisions for sulphites before the finalisation of this opinion. The current deadline for EFSA to adopt the opinion is the end of September 2022; meaning that the opinion would become available in November.

In conclusion, I would consider reapplying for an amendment only once the new EFSA opinion is published to take into account whether the proposed amendment is in line with the outcome of the EFSA assessment.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils ([Pascale.COLSON@ec.europa.eu](mailto:Pascale.COLSON@ec.europa.eu); +32.2.295.62.73), who will forward them to relevant colleagues.

Yours sincerely,

(e-Signed)  
Charlina VITCHEVA

c.c.: Pedro Reis Santos [secretary@marketac.eu](mailto:secretary@marketac.eu),  
Annette Hurrelmann, Arnaud Peyronnet, Adolfo.Merino Buisac.  
Niall Gerlitz, Katleen Baert.