

August 2023

European Commission Targeted Stakeholder Consultation on the follow-up to the re-evaluation of Sulphur Dioxide-Sulphites (E 220-228)

The European Commission would like to consult interested stakeholders on sulphur dioxide-sulphites (E 220-228) with respect to:

- **the authorisations of E 226-228; and**
- **the uses of E 220-228 in accordance with Regulation (EC) No 1333/2008 on food additives.**

Sulphites are used to maintain appearance, increase shelf-life, and prevent the growth of hazardous microorganisms (e.g., fungi, bacteria). The sulphites used by the food industry and currently authorised for use include: 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). Sulphites are authorised for use in a wide range of foods including burger meat, sausages, fruit juices, dried fruits, and wines among others.

Background information on the consultation can be [found here](#).

Why is this consultation happening?

By way of background, the safety of sulphur dioxide–sulphites (E 220–228) were re-evaluated by the European Food Safety Authority (EFSA) in [2016](#). The panel noted several uncertainties and limitations with the data submitted to them and concluded that exposure estimates were higher than the health-based guidance value (HBGV) for all population groups. As a result, a call for data was issued to address the data gaps identified, and EFSA subsequently published in November 2022 an updated [scientific opinion addressing the follow-up to the re-evaluation of sulphites](#). In this latest opinion, EFSA concluded that there was no substantial reduction in the uncertainties previously identified in the re-evaluation of these additives and exposure was still of concern for high consumers of foodstuffs containing these additives.

This consultation is part of the follow-up measures under discussion following the publication of the latest EFSA opinion. One of the recommendations from the 2022 EFSA opinion, was to explore the need to maintain a number of these additives on the EU positive list of authorised food additives. In addition, use levels for these additives were not submitted to EFSA for several food categories in which they are authorised for use. As a result, the European Commission is seeking information from stakeholders in relation to these points. Further information on this consultation can be found in the attached documentation.

What data is being requested?

Due to the lack of data submitted to EFSA as part of their evaluations on these food additives, the technological need to maintain calcium sulphite (E 226), calcium bisulphite (E 227) and potassium bisulphite (E 228) needs to be explored. Part of this stakeholder consultation is to ascertain whether there are any current uses of these three food additives. If further data is not supplied in response to this, then the intention is that these three additives will be removed

from the positive list of food additives.

In addition, in accordance with Annex II, Part E, sulphur dioxide-sulphites (E 220-228) are authorised in 40 different food categories. These additives are also authorised for use under Annex III, Part 2 and 3, where they are permitted to be added to food additive preparations and to food enzymes. Usage data for the food categories for which no data was previously supplied to EFSA need to be provided to the Commission or else these provisions will be deleted from the Regulation.

Stakeholders who have provided use levels in response to the call for data published on 10 October 2016, are also invited to confirm that the use levels they submitted and that are reported in Annex C Table C1 of the 2022 EFSA opinion are up to date. These stakeholders are also invited to provide the necessary information for the use levels submitted in October 2016 by using the attached forms.

Information in relation to the above should be provided in the relevant attachments following the instructions provided therein.

Please send all submissions to the European Commission additives team at the following email address: SANTE-E2-Additives@ec.europa.eu by 15 August 2023 using the following documents below:

1. [Form for submission of additional detailed information in support of uses and use levels of E 220-228](#)
2. [Form for submission of data on sulphur dioxide-sulphites \(E 220-228\)](#) - (Annex II, Part E, Regulation (EC) No 1333/2008)
3. [Form for submission of data on sulphur dioxide-sulphites \(E 220-228\)](#) - (Annex III of Regulation (EC) No 1333/2008)