

# **CONSULTATION ON PROPOSED AMENDMENTS TO THE FOOD REGULATIONS REGARDING FOOD ADDITIVES AND CONTAMINANTS**

## **Aim**

The Agri-Food and Veterinary Authority (AVA) is seeking feedback from the food industry (local food manufacturers and importers), on the proposed amendments to the Food Regulations concerning food additives and contaminants, as well as proposed editorial changes.

## **Summary of amendments**

Food additives permitted for use in Singapore, as well as the conditions governing their specific usage, are specified under the Food Regulations. The proposed amendments would see the incorporation of four new food additives into the Food Regulations. These proposed changes are in line with international practice, namely that of the Codex Alimentarius Commission, and/or major developed countries, and are trade facilitating measures.

Maximum limits for incidental constituents, commonly termed “contaminants” are also specified under the Food Regulations. A new limit for mercury is proposed for predatory fish. In connection with this proposed new limit, a new Schedule specifying species considered to be “predatory fish” has been proposed, taking reference from definitions in Australia, New Zealand and the European Union. The proposed new limit serves to safeguard consumer health, and provide greater transparency to the industry on Singapore’s requirements.

An amendment on the addition of phytosterols, phytosterol esters, phytostanols or phytostanol esters (collectively known as phytosterols/phytostanols) to food (regulation 250A) is proposed, to provide for the addition of phytosterols/phytostanols to a wider range of food products. Current mandatory labelling requirements for such products are also amended taking into account new information on the safety of phytosterols/phytostanols. These amendments allow for flexibility during product innovation and development by the food industry, and will facilitate easier access to such products for consumers.

A detailed description on the proposed changes can be found in [ANNEX I](#).

## **Request for comments**

AVA invites views and comments on:

- i. Whether the proposed amendments with respect to the four food additives are reflective of current industry practice.
- ii. Whether the proposed amendments with respect to the maximum limit for mercury in predatory fish and predatory fish product are practical and achievable.

- iii. Whether the proposed list of “predatory fish” species is reflective of current industry practice.
- iv. Whether the proposed revised food categories that may contain added phytosterols/phytosteranols are practical.
- v. Time required to amend and comply with the proposed mandatory labelling requirements for foods containing phytosterols/phytosteranols

**Procedure and timeframe for submitting views and comments**

AVA welcomes views and comments on the above proposal. All submissions should be clearly and concisely written, and should provide a reasoned explanation for any proposed revisions.

Submissions should reach AVA no later than 12:00 p.m., 15 April 2014, through mail, or email, to the following addresses:

**Mail:**

Regulatory Programmes Department  
Agri-Food & Veterinary Authority of Singapore  
5 Maxwell Road #18-00 Tower Block  
MND Complex, Singapore 069110  
(Attention: Mr Low Teng Yong)

**Email:**

low\_teng\_yong@ava.gov.sg

## ANNEX I - PROPOSED AMENDMENTS TO THE FOOD REGULATIONS

The Agri-Food and Veterinary Authority of Singapore (AVA) has completed a review of the Food Regulations and proposes the following amendments:

### A. TO ALLOW THE USE OF NEW FOOD ADDITIVES

- 1) Chromium picolinate as a nutrient source of chromium (under the Seventh Schedule).
- 2) Serine protease (trypsin) from a genetically modified strain of *Fusarium venenatum* (under the Eighth Schedule).
- 3) Polygalacturonase from *Aspergillus niger* (under the Eighth Schedule).
- 4) Invertase from *Saccharomyces cerevisiae* (under the Eighth Schedule).

### B. TO SPECIFY MAXIMUM LIMIT FOR TOTAL MERCURY IN PREDATORY FISH

At present, Regulation 31(3) of the Singapore Food Regulations stipulates the following maximum levels for total mercury:

- 0.5 ppm for any fish or fish product
- 0.05 ppm for any other food

AVA's surveillance data reveal that total mercury levels of most species of fish consumed in Singapore fall below 0.5 ppm. There are however, some species of predatory fish that have been found to contain more than 0.5 ppm total mercury. As predatory fish are normally consumed less frequently than other species of fish, they are not considered to be a significant source of mercury to the average diet.

Internationally, many countries such as Australia, Canada, the European Union and New Zealand, have set a higher maximum level for total mercury (1 ppm) in predatory fish (which tend to accumulate higher levels of mercury due to their diet) on top of a lower maximum level for mercury (0.5 ppm) in most fish species. As Singapore's current maximum level for mercury in fish does not take into consideration the higher levels of mercury naturally found in predatory fish, this may pose a trade barrier in international trade.

AVA proposes to amend Regulation 31(3) of the Food Regulations to specify a maximum level of 1 ppm for total mercury in predatory fish and their products. The level of 0.5 ppm for total mercury in other fish and their products, and 0.05 ppm for total mercury in food products (other than fish) remains unchanged. The list of proposed predatory fish species is provided in [Appendix I](#).

### C. TO ALLOW THE USE OF PHYTOSTEROLS/PHYTOSTANOLS IN MORE FOOD PRODUCTS

The addition of phytosterols/phytostanols is currently limited to only 3 groups of food products: low fat milk, low fat yoghurt, and fat spreads. AVA has conducted a review and note that the Joint FAO/WHO Expert Committee on Food Additives

(JECFA) and Food Standards Australia New Zealand (FSANZ) have found no safety issues for the consumption of phytosterols/phytostanols by the general public. As such, there is no need to continue restricting the use of these substances. Nonetheless, the use of phytosterols is proposed to be limited to:

- (i) edible vegetable fats and oils containing not more than 20g of saturated fat per 100g total fat, and margarine and fat spread containing not more than 27g of saturated fat per 100g total fat; and
- (ii) other foods containing not more than 3g of total fat per 100g or 1.5 g of total fat per 100ml.

This restriction is to ensure that phytosterols are not added to foods that have the potential to increase blood cholesterol levels.

In addition, the current mandatory statements that are required for products containing phytosterols/phytostanols as stipulated under Regulation 250A(3) are proposed to be amended to the following:

- (a) The product may not be nutritionally appropriate for pregnant and breast-feeding women and children under the age of 5 years;
- (b) The product should be used as part of a balanced diet;
- (c) A statement recommending the daily consumption of 2 - 3g of phytosterols/phytostanols.
- (d) A statement of the amount of phytosterols, phytosterol esters (calculated as phytosterols), phytostanols or phytostanol esters (calculated as phytostanols) that each serving contains.

## APPENDIX I – TYPES OF PREDATORY FISHES

Predatory fishes include the following:

1. Anglerfish (*Lophius* species)
2. Atlantic catfish (*Anarhichas lupus*)
3. Bonito (*Sarda sarda*)
4. Eel (*Anguilla* species)
5. Emperor, orange roughy, rosy soldierfish (*Hoplostethus* species)
6. Grenadier (*Coryphaenoides rupestris*)
7. Halibut (*Hippoglossus hippoglossus*)
8. Kinglip (*Genypterus capensis*)
9. Marlin (*Makaira* species)
10. Megrim (*Lepidorhombus* species)
11. Mullet (*Mullus* species)
12. Pink cusk eel (*Genypterus blacodes*)
13. Pike (*Esox lucius*)
14. Plain bonito (*Orcynopsis unicolor*)
15. Poor cod (*Tricopterus minutes*)
16. Portuguese dogfish (*Centroscymnus coelolepis*)
17. Rays (*Raja* species)
18. Redfish (*Sebastes marinus*, *S. mentella*, *S. viviparus*)
19. Sail fish (*Istiophorus platypterus*)
20. Scabbard fish (*Lepidopus caudatus*, *Aphanopus carbo*)
21. Seabream, pandora (*Pagellus* species)
22. Shark (all species)
23. Snake mackerel or butterfish (*Lepidocybium flavobrunneum*, *Ruvettuspretiosus*, *Gempylus serpens*)
24. Sturgeon (*Acipenser* species)
25. Swordfish (*Xiphias gladius*)
26. Tuna (*Thunnus* species, *Euthynnus* species, *Katsuwonus pelamis*)