This opinion is that of the Standing Committee on Plants, Animals, Food and Feed and has not been adopted or endorsed by the European Commission. The views may not in any circumstances be regarded as stating an official position of the Commission. This opinion is intended to assist national authorities in the application of Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives. Only the Court of Justice of the European Union is competent to authoritatively interpret Union law.

OPINION OF THE STANDING COMMITTEE ON PLANTS, ANIMALS, FOOD AND FEED TO ACHIEVE A HARMONISED IMPLEMENTATION OF THE EU LEGISLATION

Subject: Use of excessive amounts of antioxidants

'Antioxidants' is a functional class of food additives defined in Annex I to Regulation (EC) No 1333/2008 as substances which prolong the shelf-life of foods by protecting them against deterioration caused by oxidation, such as fat rancidity and colour changes. They differ from another functional class 'preservatives', i.e. substances acting against microorganisms.

Certain food additives typically used as antioxidants (e.g. ascorbic acid-ascorbates, citric acid-citrates) are authorised in different food categories at *quantum satis*, i.e. to be used in accordance with good manufacturing practice, at a level not higher than is necessary to achieve the intended purpose and provided the consumer is not misled.

Currently, several cases of the use of high levels of antioxidants (especially in meat and fish) have been noticed for which their compliance with the *quantum satis* principle was put in question.

On 17 September 2018 the Standing Committee endorsed unanimously the following:

Food additives authorised at *quantum satis* acting as antioxidants shall be used at a level not higher than is necessary to achieve the intended purpose, i.e. an antioxidant effect.

The use of higher levels, e.g. to mask or replace the use of preservatives to avoid regulatory restrictions for preservatives and to extend the shelf-life and fresh appearance as if preservatives were used, is not in compliance with the *quantum satis* principle and thus not authorised.

For the use of ascorbic acid-ascorbates (E 300-302) in tuna loins the level of no more than 300 mg/kg is regarded as sufficient to achieve the desired antioxidant effect[1].

[1] The Standing Committee takes into account the reported use levels for fish food categories captured in the EFSA opinion on the re-evaluation of ascorbic acid (E 300), sodium ascorbate (E 301) and calcium ascorbate (E 302) as food additives (EFSA Journal 2015;13(5):4087; http://www.efsa.europa.eu/en/efsajournal/pub/4087). The Standing Committee considers that at the current level of knowledge the highest maximum level reported in the EFSA opinion (300 mg/kg) represents the highest level justified as necessary to accomplish the desired antioxidant effect.