



關於《食物內防腐劑規例》（第132BD章）的建議修訂的意見

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1 Attachment



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尊敬的食物安全中心領導：

您好！

附件是關於《食物內防腐劑規例》（第132BD章）的建議修訂的意見，請予以考量和採納。感謝！

BR,
Claire

關於《食物內防腐劑規例》(第 132BD 章) 的建議修訂的意見

尊敬的食物安全中心領導：

您好！

日前，從食物安全中心官網獲悉，香港政府就《食物內防腐劑規例》(第 132BD 章) (以下簡稱《規例》) 的建議修訂已展開公眾諮詢。

《規例》的建議修訂是以食品法典委員會的標準為骨幹，輔以內地和其他主要食品貿易夥伴的標準，除建議更新「防腐劑」和「抗氧化劑」的定義、更新／制訂准許防腐劑和抗氧化劑的最高准許含量外，還建議新增 25 種准許使用的「防腐劑」或「抗氧化劑」。這其中就包括了 30 種磷酸鹽 (列於建議修訂附件 III 第 36 項)。

然而，在最新版 CODEX STAN 192-1995 GENERAL STANDARD FOR FOOD ADDITIVES (2021 Revision) 中，這 30 種磷酸鹽在食品中發揮的功能絕大多數並不是防腐劑或者抗氧化劑，而是酸度調節劑、乳化劑、水分保持劑、穩定劑、螯合劑、增稠劑等，只有磷酸 (INS 338) 和磷酸三鈉 (339 (iii)) 會分別發揮抗氧化劑和防腐劑功能 (詳見附件圖一)。業界實際使用情況也與該標準一致。

此外，磷元素在自然界中廣泛存在。很多食物天然含有磷酸鹽，有些食物本底值還不低。例如，生鮮和熟制肉品中的磷酸鹽本底值在 5000 mg/kg 左右，小麥粉中磷酸鹽的天然本底值在 2.55-3.59 mg/kg 之間^[1]，已經超過或者非常接近修訂建議中相應的最高准許含量。如果將這 30 種磷酸鹽均納入《規例》，實際執行過程中也會給業界和監管部門帶來一定困擾。

基於以上原因，將 30 種磷酸鹽均納入《規例》中予以規管的修訂建議並不合適，也與事實不符。因此，建議將其他 28 種磷酸鹽從附件 III 中刪除，僅保留磷酸 (INS 338) 和磷酸三鈉 (339 (iii))。

以上，請予以考量並採納。

Claire Kong

2023 年 6 月 24 日

附件：



PHOSPHATES

INS 338	Phosphoric acid	Functional Class: Acidity regulator, Antioxidant , Sequestrant
INS 339(i)	Sodium dihydrogen phosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 339(ii)	Disodium hydrogen phosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener
INS 339(iii)	Trisodium phosphate	Functional Class: Acidity regulator, Emulsifier, Humectant, Preservative , Sequestrant, Stabilizer, Thickener
INS 340(i)	Potassium dihydrogen phosphate	Functional Class: Acidity regulator, Emulsifier, Humectant, Sequestrant, Stabilizer, Thickener
INS 340(ii)	Dipotassium hydrogen phosphate	Functional Class: Acidity regulator, Emulsifier, Humectant, Sequestrant, Stabilizer, Thickener
INS 340(iii)	Tripotassium phosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener
INS 341(i)	Calcium dihydrogen phosphate	Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 341(ii)	Calcium hydrogen phosphate	Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Stabilizer, Thickener
INS 341(iii)	Tricalcium phosphate	Functional Class: Acidity regulator, Anticaking agent, Emulsifier, Emulsifying salt, Firming agent, Flour treatment agent, Humectant, Raising agent, Stabilizer, Thickener
INS 342(i)	Ammonium dihydrogen phosphate	Functional Class: Acidity regulator, Flour treatment agent, Raising agent, Stabilizer, Thickener
INS 342(ii)	Diammonium hydrogen phosphate	Functional Class: Acidity regulator, Flour treatment agent, Raising agent, Stabilizer, Thickener
INS 343(i)	Magnesium dihydrogen phosphate	Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Stabilizer, Thickener
INS 343(ii)	Magnesium hydrogen phosphate	Functional Class: Acidity regulator, Anticaking agent, Emulsifying salt, Raising agent, Stabilizer, Thickener
INS 343(iii)	Trimagnesium phosphate	Functional Class: Acidity regulator, Anticaking agent, Stabilizer, Thickener
INS 450(i)	Disodium diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 450(ii)	Trisodium diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 450(iii)	Tetrasodium diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 450(ix)	Magnesium dihydrogen diphosphate	Functional Class: Acidity regulator, Raising agent, Stabilizer
INS 450(v)	Tetrapotassium diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 450(vi)	Dicalcium diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Firming agent, Raising agent, Sequestrant, Stabilizer, Thickener
INS 450(vii)	Calcium dihydrogen diphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer
INS 451(i)	Pentasodium triphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener
INS 451(ii)	Pentapotassium triphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener
INS 452(i)	Sodium polyphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 452(ii)	Potassium polyphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 452(iii)	Sodium calcium polyphosphate	Functional Class: Acidity regulator, Emulsifier, Humectant, Raising agent, Sequestrant, Stabilizer
INS 452(iv)	Calcium polyphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Raising agent, Sequestrant, Stabilizer, Thickener
INS 452(v)	Ammonium polyphosphate	Functional Class: Acidity regulator, Emulsifier, Emulsifying salt, Humectant, Sequestrant, Stabilizer, Thickener
INS 542	Bone phosphate	Functional Class: Anticaking agent, Emulsifier, Humectant

參考文獻：

- [1] 杜業剛, 等. 食品中天然產生的化學污染物本底值分析[J]. 中國食品添加劑, 2013 (2): 165-168.