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**Economic Commission for Europe****Steering Committee on Trade Capacity and Standards****Working Party on Agricultural Quality Standards****Specialized Section on Standardization  
of Dry and Dried Produce****Seventieth session**

Geneva, 14–16 June 2023

Item 9 of the provisional agenda

**Sulphur dioxide content in dried apricots****Comment by the delegation of Türkiye regarding sulphur  
dioxide content in dried apricots****Submitted by the delegation of Türkiye**

Sulphur dioxide (SO<sub>2</sub>) is currently ongoing a reclassification process under Classification Labelling and Packaging Regulation (1272/2008) in the European Union. European Food Safety Agency (EFSA) published its opinion in December 2022 and stated that the available toxicity data was insufficient to derive an Acceptable Daily Intake (ADI) level and established the Margins of Exposure (MOE). EFSA recommended that the maximum limits be lowered and the current sulphur dioxide–sulphite usage levels may be of concern.

For some products this would have a major impact, for example 80 per cent of the dried apricots are treated with sulphur dioxide.

Türkiye believes that the available toxicity data was insufficient to support the conclusion by EFSA.

Moreover, sulphites have some specific properties (preservative and antioxidant properties) and there are no viable alternatives.

Sulphur dioxide is a versatile chemical compound that has a wide range of uses in various industries. For many people, they are more likely to be exposed to higher amounts of SO<sub>2</sub> in other ways than SO<sub>2</sub> in foodstuffs.

Therefore, lowering maximum levels for sulphur dioxide in dried fruits may be detrimental to achieving other safety benefits such as prevention of microbial and pest incidences in dried fruit producing countries. In addition, lowering maximum levels for sulphur dioxide in dried apricots would trigger substantial economic losses, major trade disruptions along the food chain and would cause unemployment in the producing countries, while it would not necessarily contribute to the better protection of the health of the European consumers.

In conclusion, Türkiye believes that the maximum level for sulphur dioxide in dried apricots should be maintained as 2.000 ppm which is also the regulated level not only laid down in European Union Regulations but also in Codex Alimentarius Standards.