

# Global Food Phosphate Regulatory Limits Quick Sheet (2026)

A practical reference to speed up compliance checks by region and product category.

**Important:** This quick sheet is for compliance screening and workflow acceleration, not legal advice. Regulations and database entries may change. Always verify the latest official text for your exact food category and destination market before production, labeling, and export.

## 1) How to Use This Quick Sheet (Fast Workflow)

1. Identify the destination market (EU / US / China / ASEAN / Codex reference / Japan / GCC).
2. Map your product to the official food category in that market (e.g., meat preparations, processed fish, bakery wares, processed cheese).
3. Search the official database/text using the additive group name and ID (E-numbers / INS).
4. Confirm how limits are expressed (often as P2O5; sometimes as a “sum of phosphates”).
5. Capture evidence (save the official entry + keep supplier COA/TDS/SDS in your compliance file).

## 2) Key Notation You'll See in Regulations

- **E-numbers (EU):** often discussed as a group (E338–E452). Limits are set by food category.
- **INS (Codex / many regions):** common phosphate families include INS 450 (diphosphates), INS 451 (triphosphates), INS 452 (polyphosphates).
- “**Expressed as P2O5**”: a frequent way of expressing maximum levels for phosphates in some frameworks.
- **GMP / quantum satis:** no fixed numeric MPL in that entry; use the minimum amount needed for technical function while meeting all labeling and safety requirements.

## 3) Official References by Region (Where to Check Limits Fast)

Region	Primary legal reference (where to check)	Typical expression	Fast verification tip	Common pitfalls
Codex (global reference)	Codex GSFA (Codex STAN 192-1995) – online GSFA database	Max levels by food category (varies by entry)	Search GSFA by INS 450/451/452 and filter by food category	Codex is a reference; national laws may differ in categories and limits
European Union (EU)	Regulation (EC) No 1333/2008 and the Union list updates	Often as P2O5 and/or “sum of phosphates” (category-dependent)	Find the food category, then locate the phosphate group entry (E338–E452) and notes	Category mapping matters; some MPLs apply only to specific named products

Region	Primary legal reference (where to check)	Typical expression	Fast verification tip	Common pitfalls
United States (US)	FDA eCFR (varies by phosphate salt and intended use) + any standards of identity if applicable	Often “in accordance with good manufacturing practice” (entry-dependent)	Confirm the specific phosphate salt entry and any product standard-of-identity constraints	GMP is not unlimited; technical justification and labeling still apply
China	GB 2760 (National Food Safety Standard for Food Additives) + relevant GB standards	Max usage/residue levels by additive and food classification	Match product to GB food category; check the phosphate additive entry and restrictions	Choose the correct subcategory; follow the most specific applicable requirement
ASEAN	ASEAN Maximum Use Levels / harmonized additive references (member-state adoption varies)	Food-category-based max use levels (often Codex-aligned)	Search by INS 450/451/452 and cross-check local implementation	Member-state differences; always verify the local law used at import
Japan	Japan CAA/MHLW designated additive framework (confirm current listings and conditions)	Permitted uses and conditions depend on Japanese standards	Verify additive status, then confirm conditions/limits for the product type	Do not assume EU/Codex category mapping is identical
GCC (Gulf)	GSO food additive standards (often reference Codex GSFA as baseline)	Category-based limits; may reference Codex approach	Verify the applicable GSO standard and local implementation requirements	Some texts may be paywalled; keep official excerpts in compliance files

## 4) Product-Category Shortcuts (What to Search)

Use this table to decide what keywords to search in the official database for your region and product type.

Product category (typical use)	Keywords to search	How limits are commonly written	Notes
Meat & poultry (injection/tumbling)	meat preparations; phosphates; E338–E452; INS 450/451/452	Often as P2O5; sometimes as “sum of phosphates”	Confirm whether your SKU is “meat preparations” vs “meat products” and whether the entry targets specific sub-products
Seafood (shrimp, fish fillets)	processed fish; crustaceans; polyphosphates; E451/E452; INS 451/452	Often as P2O5 and/or “sum of polyphosphates”	Check both additive limits and labeling expectations for treated seafood in the target market

Product category (typical use)	Keywords to search	How limits are commonly written	Notes
Bakery & fried dough (SAPP systems)	raising agent; diphosphates; SAPP; E450; INS 450	May be numerical MPL or GMP depending on category	Verify whether the category is premix, dough, or finished baked good
Dairy / processed cheese (emulsifying salts)	processed cheese; emulsifying salts; phosphates; E339–E452	Often numerical MPL; may be defined by cheese type	Standards of identity / naming rules can affect both additives and labeling
Infant / young children foods	infant formula; baby foods; category restrictions; carry-over	Often restricted and category-specific	Always check infant/young children sections first; requirements are typically stricter

## 5) Compliance Checklist (Copy/Paste for Your Internal SOP)

- **Confirm additive identity:** exact phosphate type and mapping (e.g., STPP vs SHMP vs SAPP).
- **Confirm metric:** mg/kg “as-is” vs mg/kg as P2O5; single additive vs “sum of phosphates”.
- **Confirm category mapping:** your SKU’s regulatory food category in the destination market.
- **Confirm processing & labeling expectations:** especially for seafood treatments and processed foods.
- **Keep evidence:** save the official entry and retain supplier COA/TDS/SDS for the batch used.

## References (Official Sources to Verify Limits)

- Codex Alimentarius: General Standard for Food Additives (GSFA), Codex STAN 192-1995 (GSFA Online Database).
- European Union: Regulation (EC) No 1333/2008 on food additives (Union list and amendments).
- United States: FDA eCFR (search the specific phosphate salt entries and any applicable standards of identity).
- China: GB 2760 (National Food Safety Standard for Food Additives) and related GB standards for food additives.
- ASEAN: ASEAN Maximum Use Levels / food additive references (verify local implementation in member states).
- Japan: Consumer Affairs Agency / MHLW designated additives and applicable standards (verify current listings and conditions).
- GCC: GSO food additive standards (verify local implementation requirements).

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