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Agenda Item 5

JOINT FAO/WHO FOOD STANDARD PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Thirteenth Session, Kuala Lumpur, Malaysia 17-20 September 2002

PROPOSED DRAFT STANDARD FOR INSTANT NOODLES

- COMMENTS AT STEP 3 -

Following Governments submitted their comments on the proposed draft standard for instant noodles.
Indonesia, Japan, Republic of Korea, Australia

INDONESIA

BACKGROUND

1. The 12th session of the Codex Coordinating Committee for Asia (CCASIA) has agreed upon the characteristics and definition of the “Instant Noodles” as follows:
 - The name of the standard should be “Codex Standard for Instant Noodles”.
 - The process of pregelatinization is characteristic and prerequisite for “instant noodle”.
 - Product definition:

Instant Noodle is a product prepared from wheat flour or rice flour as the main ingredient with or without the addition of other ingredients. It may be treated by alkaline agents. It is characterized by the use of pregelatinization process and dehydration either by frying or by other methods.
2. The 47th Session of the Executive Committee approved the proposed definition by the CCASIA Committee and asked CCASIA to initiate a new work and noted that the draft standard should be as broad as possible, non descriptive and cover a world wide range of products.
3. On 21-22nd May, 2002, 2nd Asean Task. Force on Codex Meeting, the Indonesian proposal was approved as Asean proposal. On 23rd May 2002, Indonesia hosted the informal meeting which Asean countries and attended by Japan to “finalize” the proposed draft standard. Although both Asean

countries and Japan have reached almost all items appeared in the draft but several points need to be clarified in 13th CCASIA.

4. Instant Noodles are widely produced, traded and consumed world wide in recent years. It is featured as good quality food, healthy and nutritious as well as very convenience food. Therefore, it is very importance to accelerate the development of Codex International Standard which could accommodate the consumer's need diversity in food habits, cultures and social-economical condition of codex member countries.

ISSUES TO BE ADDRESSED

5. Based on the 47th session of the EC which clearly noted the enormously growth of Instant noodle market, there is a need to consider the use of food additives in which CCFAC has approved on their safety aspect.
6. Establishment of quality criteria should be based on scientific basis to ensure safety and provide better control in line of production. Thus, the quality criteria should be a stable and needs measurably parameter to ensure its validity.

RECOMMENDATIONS

Indonesia on behalf of Asean Member Countries would like to invite other Asean members as well as ASIAN members, jointly support the proposed draft for Instant Noodle which could represent common interest in the development of fair trade. Therefore on behalf of ASEAN countries, Indonesia would like to propose:

- i. Deletion of Peroxide Value since POV measures only an intermediate result during oil heat process reaction (peroxide). POV very susceptible to changes therefore it is not a precise measurement. In other hand, Acid Value have better performance and it could correlate with degree of deterioration.
- ii. Considering Degree of Pregelatinization if it is necessary, it could be included as one of measurement parameters of the instant noodle standard.
- iii. Deletion of the list of additives since CCFAC has regulated the use of food additives.

JAPAN

1. Scope

The whole sentence with square blanket, [This Standard does not apply for pasta], should be deleted.

(Reason)

It was very difficult to define the pasta at the discussion of GSFA in Codex Committee for Food Additives and Contaminants. Therefore the whole sentence with square blanket referred to pasta should be deleted.

2. Description

10. The original text should be changed as follows;

2. Description

2.1 Instant Noodles is a commodity produced by steam and dehydration process with either frying or other manner, which starch in noodle is pregelatinized.

2.2 Noodle is made from mainly wheat and rice flour with or without alkalis and other ingredients in long thin stick, which includes Mi, Mien, Myon, Ramen and etc.

(Reason)

Dividing provision makes more exact description with respect to instant noodles.

3.1.1 Essential Ingredients

Square blankets should be deleted.

(Reason)

In Japan, there is a kind of noodle which is made from wheat and buckwheat flour. Therefore square blankets should be deleted.

3.2.3 a) Moisture Content

Moisture Content for noodles dried by other process should be 14.5%.

3.2.3 c) Peroxide Value

Square blanket should be deleted.

(Reason)

To protect the health of consumers and maintain the quality of instant noodles, we need to establish the provisions on Peroxide Value as well as Acid Value, because only the provision of Acid value as 3.2.3.b) is not enough to catch the rancidity of oils and fats.

We suppose it is desirable for the standard value of rancidity of oils and fats to catch it certainly with using both indexes complementally with considering the differences of the indication period and rising speed of value and control it as low as possible.

Therefore, we can say it is possible to make quality control for rancidity of oils and fats effectively by only using both indexes, which are "Acid Value" and "Peroxide Value".

For the purpose that the instant noodles born and bred in Asia will expand in worldwide market, we think it is very important to provide high quality commodity to the market constantly and to get confidence and good reputation from consumers.

Besides there are any cases it is obliged to keep the commodity in high temperature and humidity in a region, if the unnecessary provisions to secure consumer's health is established, they will cause more commodity loss in distribution process and impose us large economic loss.

However if we cause a health disaster to consumers as a result of distribution of poor-quality commodities that have not exceeded the adequate standard, they never fail to cause lost of good reputation and give us an unrecoverable immense economic loss. Therefore we have to consider such a situation thoroughly.

In addition, we would like to mention we would provide further information for the next forthcoming session of CCASIA and we suppose that we should discuss this matter thoroughly.

3.2.3 d) Degree of Pregelatinization

Square Blanket should be deleted.

(Reason)

The Degree of Pregelatinization is one of significant indication for Instant noodles, which should be prescribed in this standard. We have analyzed this analyte for three decades years. Therefore we believe that it is possible to elaborate the level.

Appropriate standard value differs depending on the kind of starches, that is to say, 1.0 as wheat flour, 0.8 as rice flour, 0.7 as buckwheat flour.

In considering the differences of value, we would propose "not less than 0.7" as the common standard value, because we need to secure the degree of pregelayinization among all kind of Instant Noodles.

4. Food Additives

Whole sentence of first paragraph with square blanket should be deleted. Square blanket of second paragraph should be deleted.

(Reason)

Instant noodles seem to be imaged to use more food additives than actual use, because they are included in the GSFA category "6.4.3 Pre-cooked Pastas and Noodles and like products".

Therefore we suggest we should consider the merit caused by the way of listing up the food additives limited to actual use only.

6. Container or Packaging Condition

It should be considered the necessity in relation to specific prescription for container or packaging condition in this standard.

(Reason)

In the case of establishing this provision, if we provide "adequate damp-proofing properties and strength" in Flexible Container, we should make any provisions to secure it. Besides, if we prescribe "adequate strength, heat resistance, thermal insulation, water resistance and oil resistance" in Rigid Container, we need to secure it.

9. Methods of Analysis and Sampling

All method of analysis in this provision should be [Under Consideration].

(Reason)

The methods of moisture and acid value described in this provision do not apply to instant noodles because these methods do not refer the sample preparation.

We are now developing the methods of moisture, acid value, peroxide value and degree of pregelatinization prescribed in Quality Factors and will provide the information with respect to validation data on criteria of "Principle for the Establishment of Codex Methods of Analysis" described in the Codex Procedure Manual in accordance with Recommendations for a Checklist of Information Required to Evaluate Methods of Analysis Submitted to the Codex Committee on Methods of Analysis and Sampling" Therefore the description of original text should be changed into our proposal.

REPUBLIC OF KOREA

In accordance with Agenda Item 02/5, Rep. of Korea would like to submit our information for instant noodle Suggested amendments to the 'Proposed Draft Standard for Instant Noodles' are presented below in **bold text**.

2. Description

As the wheat flour and rice flour could be used together, we therefore suggest the following:

*'The Instant Noodles is a product prepared from wheat flour **and/or** rice flour as the main ingredients, with or without the addition of other ingredients'*

We suggest to distinguish between fried noodle and dried noodle in order to provide clearer information of the product for consumers. And also to make clear for the application of the standard. It is therefore proposed as follows :

2.2 Styles

The product should be presented in one of the following styles ;

2.2.1 Fried noodle

2.2.2 Dried noodle

3. Essential Composition and Quality Factors

With regard to the Essential Composition and Quality Factors, Rep. of Korea offers the following categories.

3.1 Composition

3.1.1 Essential Ingredient

3.1.1.1 Wheat flour [and, or] [,] Rice flour, [or other flours]

3.1.1.2 [Water]

3.1.2 Optional Ingredients

3.1.2.1 Flours

3.1.2.2 Starch

3.1.2.3 Edible fats & oils

3.1.2.4 Other edible ingredients

As to the Essential and Optional Ingredients, we would respectfully suggest several changes.

First, we would propose that [other flours] that can be used in a small quantity such as legumes be included to the optional ingredients.

Secondly, as the “water” generally evaporates during the manufacturing process of Instant Noodle, it is desirable that the “water” should be excluded from essential ingredients.

Third, we suggest that the optional ingredients should be specified within the limits of the possible. Suggested amendments are as follows:

3.1.2 Optional Ingredients

(a) *Flours (other than wheat flour and rice flour)*

(b) *Starch*

(c) *Edible Fats & Oils*

(d) *Other edible ingredients*

3.2 Quality Criteria

Rep. of Korea believes that “such as mineral and organic matter” should be added at the end of the Section 3.2.2 for the full understanding of foreign matter.

Regarding the moisture content of dried noodle, we support the maximum of 14.0%.

We have noticed that the Acid Value is declared incorrectly and we therefore recommend a clear explanation.

An alternative drafting to 3.2.3 b) would be:

3.3.2 Acid value (mg KOH/g)

(a) *Fried noodle (excluding seasonings) : not more than 2.0*

We consider that POV is an index that reflects the product quality. Therefore, we propose to elaborate the POV in the draft. However, due to the lack of confidence and reproducibility in the analysis method of “Degree of pregelatinization”, we propose to delete the Section 3.2.3 c).

4. Food Additives

As the food additive provisions of Codex commodity standards are specified separately, the elaboration of the food additives and use levels are reasonable. For this reason, Rep of Korea would like to propose the food additives as follow and are presented below in **bold test**.

4. Food Additives

4.1 Alkaline agents

170(•) Calcium Carbonate	GMP
325 Sodium Lactate	GMP
339(•) Monosodium Orthophosphate)	
339(•) Disodium Orthophosphate)	
339(•) Trisodium Phosphate)	5,000 mg/kg
340(•) Dipotassium Orthophosphate)	single or in combination,
340(•) Tripotassium Orthophosphate)	expressed as phosphorus
341(•) Dicalcium Orthophosphate)	
341(•) Tricalcium Orthophosphate)	
450(•) Disodium Dihydrogendiposphate)	
450(•) Tetrasodium Diphosphate)	
451(•) Sodium Tripolyphosphate)	
452(•) Sodium Polyphosphate)	
Sodium Metaphosphate)	
452(•) Potassium Polyphosphate)	
500(•) Sodium Carbonate	GMP
500(•) Sodium Hydrogen Carbonate	GMP
501(•) Potassium Carbonate	GMP

4.2 Emulsifiers

322 Lecithin	GMP
432 Polyoxyethylene(20) Sorbitan Monolaurate)	4,600 mg/kg,
433 Polyoxyethylene(20) Sorbitan Monooleate)	single or in
435 Polyoxyethylene(20) Sorbitan Monostearate)	combination
436 Polyoxyethylene(20) Sorbitan Tristearate)	
471 Mono- and Di- Glycerides of Fatty Acids	GMP
473 Sucrose Esters of Fatty Acids	1,000mg/kg
475 Polyglycerol Esters of Fatty Acids	1,000mg/kg
476 Polyglycerol Esters of Interesterified Ricinoleic Acid	1,000mg/kg

4.3 Stabilizing and thickening agents

400 Alginic Acid	GMP
405 Propylene Glycol Alginate	1,000 mg/kg
410 Carob Bean Gum	GMP
412 Guar Gum	GMP
414 Arabic Gum	GMP
415 Xanthan Gum	GMP
440 Pectins	GMP
<i>cyclodextrin</i>	<i>GMP</i>
466 Sodium carboxymethyl cellulose	GMP
<i>1420 Starch Acetate</i>	<i>GMP</i>
<i>1450 Starch sodium octenyl succinate</i>	<i>GMP</i>

4.4 Antioxidants

304(•) Ascorbyl palmitate ester	GMP
306 Mixed Tocopherols Concentrate)	200 mg/kg, single or in combination
<i>307 •-Tocopherol</i>)	<i>200 mg/kg single or</i>
<i>319 TBHQ</i>)	<i>in combination</i>
<i>320 BHA</i>)	
<i>321 BHT</i>)	

4.5 Colours

100 Curcumin	GMP
101(•) Riboflavin	GMP
<i>150a Caramel •</i>	<i>GMP</i>
<i>150c Caramel •</i>	<i>GMP</i>
150d Caramel •	GMP
160a(•) Beta Carotene)	200 mg/kg
160a(•) Carotenes, natural extracts)	GMP
<i>160b Annatto Extracts</i>	<i>GMP</i>
<i>160c Oleoresin paprika</i>	<i>GMP</i>
Gardenia yellow	GMP

4.6 Flavour enhancers

508 Potassium Chloride	GMP
621 Monosodium Glutamate	GMP
627 Disodium 5•-Guanylate	GMP

631 Disodium 5 •-Inosinate	GMP
635 Disodium 5 •-Ribonucleotide	GMP
Disodium Succinate	GMP
(639) DL-Alanine	GMP
(640) Glycine	GMP

4.7 Acidifying agents

260 Acetic acid, Glacial	GMP
270 Lactic Acid	GMP
296 Malic Acid(DL-)	GMP
300 Ascorbic acid	GMP
330 Citric Acid	GMP
334 Tartaric Acid(L-)	1,000mg/kg, As tartaric acid
355 Adipic Acid	1,000mg/kg, As adipic acid

4.8 Humectant

<i>1520 Propylene Glycol</i>	<i>20,000mg/kg</i>
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4.9 Anticaking agents

<i>554 Sodium Aluminosilicate</i>	<i>10,000mg/kg</i>
<i>900a Polydimethylsiloxane</i>	<i>50 mg/kg</i>

4.10 Sweeteners

<i>420 Sorbitol and Sorbitol Syrup</i>	<i>GMP</i>
<i>951 Aspartame</i>	<i>GMP</i>
<i>Stevioside</i>	<i>GMP</i>

8. Labelling

In our view, it would be useful to consider our draft for reference. As an alternative Rep. of Korea proposes:

8. LABELLING

Prepackaged products covered by this Standard shall be labelled in accordance with the General Standard for the Labeling of Prepackaged Foods (CODEX STAN 1-1985(Rev. 1, 1991))

8.1 The name of the food

8.1.1 The name of the product described under Sub-section 2.2.1 shall be :

Instant Noodle(Fried noodle)

8.1.2 The name of the product described under Sub-section 2.2.2 shall be :

Instant Noodle(Dried noodle)

8.2 Additional terms relating subsection 2.2 based on the styles shall belabeled in close proximity to the name of the product.

8.3 Instant noodle containing aspartame shall bear the followingstatement Phenylketonurics : Contains Phenylalanine.

8.4 Labelling for HALAL

The term "Halal" or similar words may be used in the label in accordance with the General Guidelines for Use of the Term "Halal" (CAC/GL 27-1997).

AUSTRALIA

Australia is pleased to provide the following comments on the Proposed Draft Standard for Noodles at Step 3 of the Codex Step Procedure.

2. Description

Australia considers that when describing the essential composition of noodles, the types of flours that can be used must be as broad as possible. Therefore, Australia would amend the first sentence to include other flours.

Suggested amended text:

"Instant noodle is a product prepared from wheat flour and/or rice flour and/or other flours as the main ingredient, with or without the addition of other ingredients."

3.1.1 Essential Ingredients

Should the amendment to the description be agreed to, a consequential change is required to this section. Therefore, with the deletion of square brackets and the addition of the word "and" point (a) will read:

(a) wheat flour and/or rice flour and/or other flours.

(b) Remove square brackets from the word "water".

3.1.2. Optional Ingredients

As currently worded, this limits the optional ingredient to those that are currently used. To allow for future developments and to be as broad as possible, replace 'The optional ingredients shall be ingredients which are commonly used' with 'other foods', and delete [and guaranteed food safety and hygiene], as this phrase is not required. The section will now read:

3.1.2. Optional Ingredients

Other foods.

3.2 Quality Criteria

Australia believes that this section is too detailed and prescriptive, particularly considering the general move away from quality criteria and prescriptions within Codex.

Accordingly, Australia supports the deletion of sub points 3.2.1., 3.2.2. and 3.2.3..

4. Food Additives

The maximum level of food additives(s) and food additive(s) carryover must comply with the General Standard for Food Additives (GSFA). Australia feels that it is unnecessary to list all the permitted additives. Therefore Australia suggests that the first sentence under the Food Additives Section be amended to read:

"The use of food additive(s) as well as food additive(s) carryover shall comply with the maximum level permitted by the General Standard for Food Additives (GSFA), CODEX STAN 192-1995 (Rev 2-1999)."

Adopting this means that the sentence '[Only these food additives listed below may be used within the limits specified], and the following list of additives in square brackets can then be omitted.

6. Container or Packaging Condition

Australia has investigated other general standards for commodities (ie. rice and oats), and believes that to maintain consistency and alignment with other commodity standards, the section on flexible or rigid containers should be deleted in its entirety, and replaced with the following:

"6.1 Instant noodles shall be packaged in containers which will safeguard the hygienic, nutritional, technological, and organoleptic qualities of the product."

The containers, including packaging material, shall be made of substances which are safe and suitable for their intended use. They should not impart any toxic substance or undesirable odour or flavour to the product.

9. Methods of Analysis and Sampling

Australia considers that the acid and peroxide value is a measurement of the quality of the product, not a food safety issue, and therefore believes that sub sections 9.3 and 9.4 should be deleted. We also consider that the level of pregelatinization does not require measurement and suggest that subsection 9.5 in square brackets be deleted.