

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 4(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR ASIA

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PROPOSED DRAFT STANDARD FOR NON-FERMENTED SOYBEAN PRODUCTS (N06-2005)

COMMENTS AT STEP 3

INDIA

The proposed draft standard prepared by China, which is at step 3, has been examined and the following comments are proposed by India for consideration by the 16th session of CCASIA.

The products for which the draft standard is under consideration are soymilk (doujiang) and related products, which has a long history of usage in many countries of East Asia as well as other countries like Europe, U.S.

DESCRIPTION (Section 2); Product Definition (Subsection 2.1):

Coagulation depends on the complex inter-relationships of many variables including soybean variety, soymilk concentration and pH, temperature, **type and amount of coagulant** and coagulation method¹. Hence, the type and percentage of coagulant added should be specified in the processing of non fermented soybean products.

There are number of undesirable contents of non-fermented soybean products as follows:

Isoflavones : For adults, just 30 mg of soy isoflavones per day is the amount found to have a negative impact on thyroid function. This amount of soy isoflavones is found in just 5-8 ounces of soymilk (<http://www.mercola.com>)

Phytic acid: Non fermented soy products contain phytic acid, which has anti- nutritive properties. Phytic acid chelates zinc strongly in the intestinal tract, thus decreasing its absorption. (<http://www.drlam.com>)

Trypsin Inhibitor- This negative compound reduces the ability to digest protein. Feeding baby and child with unfermented soy product regularly depress his/her ability to grow normally. (<http://www.drlam.com>)

Nitrites- They are potent carcinogens, formed during spray- drying, and a toxin called lysinoalanine is formed during alkaline processing. (<http://www.mercola.com>)

Phyto-oestrogens- which are supposed to help alleviate the effects of low estrogen production in the body, is now believed to be a causative factor in breast cancer and infantile leukemia (<http://www.drlam.com>)

Hence, it is desirable that the product definition under product description should specify that the product is free from isoflavones, Phytic acid, Trypsin Inhibitor, Nitrites and Phyto-oestrogens

¹ Hand Book of Food Science, Technology and Engineering, Volume 4, Y.H. HUI

ESSENTIAL COMPOSITION AND QUALITY FACTORS (Section 3)

➤ Classification of Detectives (Subsection 3.3)

In this subsection there appears to be an editorial mistake that is “Section 3.3.1” should be replaced as “Section 3.2.1”

➤ Sensory index (Subsection 3.2.1)

Section 3.2.1.1 has stated subjective criteria of sensory evaluations such as unique color, aroma and no foreign smell which should be minimized to objective ones

➤ Component Requirement (Subsection 3.2.2)

The table of component mentions moisture content and protein content only. Thus, other nutritional facts should also be considered as fat, carbohydrate etc. ²

FOOD ADDITIVES (Section 4):

The given specification of food additives is following India’s national standard (PFA, BIS) thus there are no safety concerns.

METHODS OF ANALYSIS AND SAMPLING (Section 9); Sampling (Subsection 9.1):

“In addition the following should be applied to the sampling:

- (a) The instrument and the containers used for sampling shall be sterilize and avoid contamination
- (b) Samples shall be kept under the conditions, such as temperature and so on, which meet the storage requirements of the type of the non- fermented products
- (c) Samples shall be kept in the dry air tight containers. They shall carry details of person, date and place of sampling, and other traceable particulars”

This description is not required as already being mentioned in Codex General Guidelines of Sampling (CAC/GL 50-2004) UNDER THE CLAUSE 2.3.5.3 (Packaging and transmission of laboratory samples) and 2.3.7 (Sampling reports)

JAPAN

Japan considers that this work is very difficult since non-fermented soybean products have a long history and have diversified in Asian region. Japan appreciates the leadership of China and Thailand as co-chairs of the E-WG.

However, with regard to this agenda item Japan would like to point out two things in terms of Codex standard setting procedure;

- The organization of work of E-WG was not done in accordance with “*Guidelines of Electronic Working Groups*” (page 65). For example comments from E-WG members were not circulated to E-WG members.
- The working document was not distributed in accordance with “*Guidelines to Host Governments of Codex Committees and Ad Hoc Intergovernmental Task Forces*” (page 51). We received this document less than a month before the opening of the committee.

Japan strongly believes that Codex is the organization based on rules and that Codex encourages the participation of the food industry, consumers and all other stakeholders in Codex work. And it is impossible for us to communicate this proposed draft, which was not provided with comments submitted and rationale for the changes, with our stakeholders in less than a month.

Therefore, Japan proposes to defer the discussion at this meeting and develop the proposed draft in accordance with Codex rules.

In addition, it seems to us that our comments to the E-WG were not fully reflected in the working document (CX/ASIA 08/16/6), therefore we would like to re-present the summary as follows:

² Asian foods Science and Technology, Catharina Yung- Kang Wang Ang, Ke Shun Liu, Yao-Wen

Solely in Japan, there are lots of types of non-fermented soybean products. Some of which do not exist in other Asian countries, and vice versa. It seems to be difficult to have a complete list of products in the Asian region.

However, we do not see actual needs to have a complete list of products. As far as we know, there is no major health concern or no fraud practices in the trade of non-fermented soybean products except food additives. At the same time taking into account the diversification of non-fermented soybean products in the Asian region, Japan convinced that amenability to standardization is very low.

With regard to food additives Japan notes that this matter has been discussed under CCFA under the leadership of China as a host country. This year the reorganization of soybean products of Food Category System (FCS) of General Standard for Food Additives (GSFA) was adopted at the 31st session of CAC (ALINORM 08/31 REP Appendix VII), and now we are working on rearrangement and elaboration of food additives in soybean products. Taking into account the completeness of new soybean product category of GSFA, we are sure that creating commodity standards is a duplication of work.

Lastly, Japan would like to draw the attention to the recent work of CAC. This year the CAC noted the importance of applying “*Guidelines on the Application of the Criteria of Work Priorities Applicable to Commodities*” (ALINORM 08/31 REP para.105), which was adopted by the CCEXEC in 2007 in order to conduct critical review of commodity standard in accordance with “*Criteria for the Establishment of Work Priorities*”(ALINORM 08/31/3 APPENDIX II).

Therefore Japan believes that the necessity for non-fermented soybean product standard should be re-examined with this newly developed guideline.