



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

Eighteenth Session

Tokyo, Japan, 5 – 9 November 2012

PROPOSED DRAFT REGIONAL STANDARD FOR NON-FERMENTED SOYBEAN PRODUCTS (N06-2007)

COMMENTS AT STEP 3

(Replies of Indonesia, Malaysia, Philippines and CCC to CL2012/18-ASIA)

INDONESIA

Indonesia appreciates China for leading the electronic Working Group on the Proposed Draft Regional Standard for Non-Fermented Soybean Products.

While supporting the proposed draft standards, Indonesia would like to submit some comments as follows:

General Comment

According to GSFA, "soybean milk" is not used and replaced by "Soybean-based beverages". So that classification products for this standard need to consider that term.

Comment on several Sections

2. DESCRIPTION

2.1 Product Definition

Indonesia would like to propose changing the text in the section 2.1 as follow:

“Non-fermented soybean products are the products, the main ingredients of which are the soybean and/or soy derivative(s) and water which are produced without fermentation process. The products should be processed ~~by heat~~, in an appropriate manner, before or after being packed in a container, so as to prevent spoilage.”

Rationale:

The product may be processed with other technologies (other than heat), for example: high pressure processing, irradiation, etc.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.4.2 Component Requirement

Indonesia would like to propose to open the square bracket in Table 1. Components requirement, as follow:

Table 1 Components requirement

Type		Moisture (g/100g) ≤	Protein (g/100g) ≥
Soybean milk and related Products	Soybean milk	-	{2.0}
	Soybean-based beverage	-	{0.8}
Soybean curd and related Product	Semisolid soybean curd	-	2.5
	Soybean curd	92.0	{4.0}
Compressed soybean curd		75.0	13.0
Soybean milk film and related product	Soybean milk film	20.0	30.0
	Soybean milk film stick	12.0	35.0

5. 【FLAVOURINGS】

Indonesia would like to propose to open the square bracket and delete some words, as follow:

5. ~~【FLAVOURINGS】~~

The following flavourings are acceptable for use in foods conforming to this standard when used in accordance with good manufacturing practices and in compliance with the *Guidelines for the Use of Flavourings* (CAC/GL 66-2008): ~~natural flavouring substances that are extracted from the named fruits in the respective product; natural mint flavour; natural cinnamon flavour; vanillin, vanilla or vanilla extracts.~~

8. WEIGHTS AND MEASURES

Indonesia would like to propose to delete the word “tolerance rate”, as follow:

Quantity tolerance should be as follow:

Indicated weight (A)	Tolerance /tolerance rate
A ≤ 50 g	4 %
50 g < A ≤ 100 g	2 g
100 g < A ≤ 500 g	2 %
500 g < A ≤ 1000 g	10 g
A > 1000 g	1 %

Furthermore, Indonesia would like to propose to use the same unit tolerance for consistency (g or %).

MALAYSIA

Malaysia would like to offer specific comments in red as follows.

1) Section 2.2.1.1 Soybean milk

Malaysia proposes that Section 2.2.1.1 be amended as follows:

“Soybean milk is the liquid product, prepared from dried soybeans ~~with extracting protein etc. and/or removing fibres~~ that are soaked in water, pureed, boiled and strained or prepared from soy derivative(s) **such as soy flour, soy concentrate or soy isolate of soybean or a combination of these with water. It may contain sugar, salt and other food ingredients.**~~This product is prepared without adding optional ingredients”.~~

Rationale: To be in line with the GSFA Food Category System for food category 06.8.1 and to take into account locally produced soybean milk and soybean drink which contains added food ingredients such as corn and grass jelly.

2) Section 2.2.2.1 Semisolid Soybean curd

Malaysia proposes that Section 2.2.2.1 be amended as follows for clarity and to be in line with the GSFA Food Category System for food category 06.8.3:

“Semisolid soybean curd is the ~~semisolid product in which soybean protein is coagulated by adding coagulant in the~~ **prepared from soybean milk which is made into a semisolid curd by adding coagulant.**”

3) Section 2.2.2.2 Soybean curd

Malaysia proposes that Section 2.2.2.2 be amended as follows for clarity and to be in line with the GSFA Food Category System for food category 06.8.3:

“Soybean curd is the ~~solid product with a higher water content, and is made~~ **prepared from soybean milk, and coagulated by adding coagulant, which is made into a solid curd by adding coagulant.** Soybean curd can be further processed by deep-frying, grilling, frying, freezing, dehydrating or adding spices.”

4) Section 2.2.3 Compressed Soybean curd

Malaysia proposes to amend the provision as follows:

“Compressed soybean curd is partially dehydrated soybean curd, of which the water content is much lower than ~~S~~soybean curd and has a chewy texture. Compressed soybean curd can be further processed by ~~such as~~ deep-frying, grilling, frying, freezing, dehydrating or adding spices.”

Rationale: editorial

5) Section 4 Food Additives

Malaysia proposes that the format for Section 4 on Food Additives be amended as follows to be consistent with the Procedural Manual with regards to food additives:

“4.1 **Food additives listed in Table 1 and 2 of the General Standard for Food Additives (GSFA) (CODEX STAN 192-1995) in Food Category 06.8.1, 06.8.2, 06.8.3 and 06.8.4 and** Antifoaming agent, firming agent, **stabiliser, thickener, sequestrant, colour, emulsifier** and acidity regulator listed in Table 3 of the **GSFA** General Standard for Food Additives (CODEX STAN 192-1995) are acceptable for use in food conforming to this standard.”

6) Section 5 Flavourings

Malaysia proposes that Section 5 on Flavouring be amended as follows to be consistent with the format of other Codex Committee Standards:

“~~The following f~~Flavourings are acceptable for use in foods conforming to this standard when used in accordance with good manufacturing practices and in compliance with the Guidelines for the Use of Flavourings (CAC/GL 66-2008): ~~natural flavouring substances that are extracted from the named fruits in the respective product; natural cinnamon flavour; vanillin, vanilla or vanilla extracts.~~

7) Section 8 Weights and Measure

Malaysia proposes that the expression used throughout this section to be consistent, either in percent or g.

8) Section 9 Labelling

Malaysia proposes to add a new Section 9.2Bis as follows to address concern on the type of oil used either edible oil of animal origin or vegetable oil:

“9.2Bis If the product is meant to be sold as vegetarian food, the type of oil and fat added should be indicated with regards to its origin.”

PHILIPPINES

The Philippines would like to extend its appreciation to the eWG headed by China for the work on the Proposed Draft Standard for Non-fermented Soybean Products and for considering the Philippine Position previously submitted on the draft standard. As such, we would like to request for inclusion of the name of the Philippines in the list of participating countries in the eWG.

The following is the Philippine Position on the latest Proposed Draft Standard for Non-fermented Soybean Products, those in **bold and underlined fonts** are the corrections being proposed:

1. In Section 2.1, Product Definition:

For the second sentence, the Philippines would like to propose the following:

“The products should be **treated such as by heat and** in an appropriate manner, before or after being packed in a container, so as to prevent spoilage.”

2. In Section 2.2.1.1, Soybean milk:

The Philippines would like to suggest the deletion of “dried soybean” in the first sentence since fresh soybean may also be used to extract milk.

3. Section 3.5 Classification of Defectives should be under Section 3.4 and numbered as 3.4.1 Definition of Defectives and Sensory Index should be 3.4.3.

Furthermore, the Definition of Defectives may still be elaborated in into the kinds of defectives, etc.

4. Section 3.6 Lot Acceptance should also be under Section 3.4 and numbered as 3.4.2.

5. Section 4 Food Additives:

The Philippines would like to propose that other food additives listed in Table 3 of GSFA for Soy-based beverages be included under Section 4.1. Hence the statement should be:

“Food Additives listed in the latest GSFA for soy-based products are acceptable for use conforming to this Standard.”

6. Section 5 Flavourings should be under Section 4 Food Additives, as 4.2.
7. Section 9.2, of Labeling Section:

For genetically modified labeling, the Philippines does not require labeling of GMO products.

THE CALORIE CONTROL COUNCIL (CCC)

The Calorie Control Council (CCC) is an international association representing companies that make low- and reduced-calorie foods and beverages, as well as ingredients used in those products, such as intense sweeteners. The CCC holds Non Government Organization (NGO) Observer Status before Codex Alimentarius. CCC comments on CL 2012/18-ASIA, CCASIS – Request for Comments at Step 3 of the Procedure on Proposed draft Regional Standard for Non-Fermented Soybean Products, Section 4, Food Additives are provided below.

Soybean-Based Beverages, food category 06.8.1, are described in the Codex Alimentarius General Standard for Food Additives (GSFA) as “Products prepared from dried soybeans that are soaked in water, pureed, boiled and strained, or prepared from soybean flour, soybean concentrate, or soybean isolate. In a number of countries this category includes products referred to as soybean milk. Soybean-based beverages may be consumed as is, or used to prepare other soybean products, such as those in food categories 06.8.2 (Soybean-based beverage film), 06.8.3 (Soybean curd (tofu)), 06.8.4 (Semi-dehydrated soybean curd), and 06.8.5 (Dehydrated soybean curd (kori tofu)). Also includes soybean products, such as soybean-based beverage powder, which is sold as is, for reconstitution, or as a mix containing a coagulant that can be reconstituted by the consumer for preparation of home-made soft tofu.”

Soybean-Based Beverages are included in CCASIA’s “Proposed Draft Regional Standard for Non-Fermented Soybean Products (N06-2007),” provided in CL2012/18-ASIA. Section 4 of the proposed draft standard only provides for the use of antifoaming agents, firming agents and acidity regulators listed in Table 3 of the GSFA as food additives acceptable for use in non-fermented soybean products, while the GSFA currently provides for the use of stevia glycosides and sucralose in soybean-based beverages, food category 06.8.1. The CCC, therefore, requests that “intense sweeteners” be included under “Section 4. Food Additives” in the Regional Standard for Non-Fermented Soybean Products for Soybean-Based Beverages, GSFA food category 06.8.1.

“Section 3.2” of the Proposed Draft Regional Standard for Non-Fermented Soybean Products lists optional ingredients, including sugar. In light of the increased rate of obesity worldwide, the use of intense sweeteners to replace some or all of the sugar and thereby reduce the calories of “Soybean-based beverages” without negatively impacting the nutritional value of such products seems prudent.

The CCC suggests that the Coordinating Committee for Asia (CCASIA) consider guidance on food additives in the Codex Alimentarius Commission Procedural Manual, Twentieth Edition, Format for Codex Commodity Standards. According to this section, the mention of specific additives is not necessary (i.e., the functional class should be used) as the CCFA can address the individual additives (e.g., intense sweeteners) and levels of use to be included in the GSFA, thereby obviating any need for back and forth between the two committees, the CCASIA and the CCFA.