

CODEX ALIMENTARIUS COMMISSION



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World Health
Organization

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Agenda Item 7a

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

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COMMENTS ON THE PROPOSED DRAFT REGIONAL STANDARD FOR LAYER PRODUCTS

(N14-2011)

(Comments from Thailand)

Thailand appreciates the opportunity to provide comments on the Proposed Draft Regional Standard for Laver Products as follows:

2. Description

2.1 Definition of product

In the last sentence of (a), ".....the products are subsequently dried, roasted, fried, treated with edible oil and/or seasoned.", we propose to add a word "or" in each processes because a product after dried may processed by either roasted or fried or treated with edible oil or seasoned. The sentence should be as follow;

(a) Laver products are those prepared mainly with raw laver which belongs to the genus *Pyropia*, a group of marine red algae. Depending on the product type, the products are subsequently dried, roasted or fried or treated with edible oil and/or seasoned.

2.2 Product Type

We would like to add a section titled and short explanation of Process Definition under section 2 Description. The section Process Definition should be identified detail of processes which is consistency with other standard for processed fish and fisheries products. It could be more described various kinds of products and their processes.

2.2.1 Dried Laver

(a) We would like to delete the last sentence "~~...The product which is dried directly after harvesting without undergoing any other processes is also included in this type.~~" due to the product should be cleaned after harvesting before any other processes as described in Section 6 HYGIENE.

(c) We would like to move (c) to the Section 3.2 Quality Factors as the format of Codex commodity standard. However, the foreign matter can be considered as "defect" and not be desirable for all products type including roasted laver and seasoned laver not only dried laver. Thus, we would like to delete all the word in (c) and the Section 3.2 Quality Factors should be amended to response appropriate quality factors for all product types.

3. Composition and Quality Factors

3.1 Composition

3.1.2 Optional Ingredients

Generally, the reference standard of ingredients does not necessary to be identified in the Codex commodity standard. We would like to delete the word as follow;

e) ~~Sugars in accordance with the Standard for Sugars (CAC/STAN 212-1999)~~

g) Other natural flavouring substances in accordance with the ~~Guideline for the Use of Flavourings (CAC/GL 66-2008)~~

In content of Item h), there are several optional ingredients can mix in laver products, not only nuts and seeds, anchovy, shrimp but also other ingredients. The sentence should be amended as follow;

"h) Other ingredients such as nuts and seeds, anchovy, shrimp not exceeding 10% of the total weight of the product"

3.2 Quality Factors

According to the comment of Thailand in section 2.2.1 Dried Laver (c), Thailand would like to add detail of foreign matters in this section. Although foreign matters identified are not harmful to a human body as the footnote of foreign matters, it will be an indicator of cleanness of laver. Furthermore, some edible foreign matter such as small shrimp can be food allergen. Thus, Thailand proposes to add the sentence can be read as follow;

"The final product shall maintain its own flavor and color, which represent its raw materials and processing methods and it shall be free from off-flavors and foreign matters." Moreover, the tolerance on this matter should be addressed.

5. Contaminants

We would like to delete provision of pesticides because JECFA not currently identify seaweed products in any food categories. We considered that pesticides may not potential hazard in laver products. Thus, Thailand would like to delete the sentence as follow;

~~"The products covered by this standard shall comply with the Maximum Levels of the General Standard for Contaminants and Toxins in Food and Feed (CODEX/STAN 193-1995). And the products covered by this standard shall comply with the maximum residue limits for pesticides established by the Codex Alimentarius Commission."~~

The contamination with metals which are arsenic, cadmium, and lead should be considered as a priority. The MLs of contaminants should be established by CCCF before adopt this standard in step 8.

7. Weights and Measures

Tolerance of the weight of the product should be clarified why are there both gram unit and percent.

8. Labelling

According to the our proposal about foreign matters in section 3.2, we would like to delete all sentences in (b);

~~(b) When a product contains holes, torn or rolled parts and/or edible foreign matter as described in Section 2.2.1(c), the grade of products may be labeled according to the legislation of the country where the product is distributed~~