

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COORDINATING COMMITTEE FOR EUROPE

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PROPOSED DRAFT REVISED REGIONAL STANDARD FOR VINEGAR GOVERNMENT COMMENTS AT STEP 3

GERMANY

In April 2000 the following European standards on the composition and labelling of vinegar have been adopted:

CEN standard on vinegar, products from liquids of agricultural origin, definitions, requirements, labelling

CEN standard on acetic acid food quality, products from raw materials of non-agricultural origin, definitions, requirements, labelling.

On this background it should be carefully examined whether a relevant regional standard is required in addition to these standards

If this question is to be answered in the affirmative the proposed draft standard will have to be corrected in some respects. To this extent, it should be made a proviso to make proposals on amendments.

C.P.I.V. (COMITE PERMANENT INTERNATIONAL DU VINAIGRE - PERMANENT INTERNATIONAL VINEGAR COMMITTEE)

As association representing the interests of the producers of fermented vinegar in EU member states and additionally Poland and Hungary, we like to comment on this document as follows:

1. Clause 3.1: Raw Materials

In the Proposed Draft „distilled alcohol of silvicultural origin“ is mentioned as raw material for the production of fermented vinegar in clause 3.1.1 (IV).

According to the producers of fermented vinegar in EU member states, this raw material is not suitable for vinegar production. Further to definition 2.1, vinegar is a product obtained from double fermentation based on agricultural raw materials. This does not apply to alcohol of silvicultural origin. **We therefore apply for cancellation of this raw material.**

2. Clause 3.3.2: Residual Alcohol Content

In our opinion the limits for this content have been mixed up with each other. In the

CEN Standard for Vinegar, Definitions, Requirements, Marking

version April 2000, which you may find attached as *annex 1*, the following limits for residual alcohol are specified:

- wine vinegar not more than 1.5 %
- vinegars other than wine vinegar not more than 0.5 %
- for special vinegars on the basis of wine vinegar not more than 3 %.

We apply for adoption of these limits already settled in the official CEN Standard for Vinegar April 2000.

3. Clause 4: Food Additives

The limits for food additives mentioned are partly not in conformity with the admission according to European Union law. We suggest to achieve a harmonization in this field. We apply for adoption of the following EU limits into the Draft Codex Alimentarius:

- chapter 4.1 antioxidant
 - sulphur dioxide 170 mg/kg (instead of 70 mg/kg)
- chapter 4.2 colour
 - According to European law the colour E 150 c shall be adopted in vinegars in quantum satis. We apply for cancellation of the 1 g/kg limit.
- chapter 4.4 stabilizer
 - As far as we know the stabilizer E 1201 (Polyninylpyrrolidone) is not admitted for the use in fermented vinegars according to European law.

4. Chapter 7.1.: Marking

In our opinion the labelling provisions of the Codex Alimentarius are not complete. **We apply for adoption of the provisions for the denomination of „Vinegar“ in the CEN Standard for Vinegar April 2000, chapter 4, that means**

- 7.1.1 The name „vinegar“ shall only be used for products obtained from products of agricultural origin. These products shall be marked accordingly.
 - The name „vinegar“ shall not be used for mixtures of vinegar and acetic acid food grade.
- 7.1.2 Vinegar produced from a single raw material shall be marked with the name „vinegar“ in connection with the indication of the raw material.
 - Vinegar produced from several raw materials shall be marked with the name „vinegar“ in connection with the indication of all the raw materials.

5. Clause 8.: Methods of Analysis and Sampling

The Association of Vinegar Producers in EU member states, C.P.I.V., has elaborated methods of analysis for vinegar by different ring tests. Those tests are based on available methods for the determination of wine.

We apply for consideration of the C.P.I.V. Methods of Analysis for Vinegar, which are available for the

- Determination of Total Acidity as Acetic Acid
- Determination of Residual Alcohol as Ethanol
- Determination of Soluble solid
- Determination of Ash.

An excerpt of the journal „Die Branntweinwirtschaft, April 2000“ where the above methods have recently been published is attached as *annex 2*.

Annex 1 to letter of 14 August 2000 (not available in electronic version)

Annex 2 to letter of 14 August 2000 (not available in electronic version)