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Agenda Item 5(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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PROPOSED DRAFT REVISION OF THE FOOD CATEGORY SYSTEM OF THE GENERAL STANDARD FOR FOOD ADDITIVES (N11-2007)

COMMENTS AT STEP 3

The following comments have been received from the following Codex members and observers:

Australia, Brazil, Japan and IFMA

Australia

Australia is pleased to provide the following comments in response to CX/FA 08/40/6: Draft Revision of the Food Category System of the General Standard for Food Additives (N11-2007) at Step 3 and appreciates the opportunity to comment on this document.

Australia wishes to thank Indonesia and the members of the electronic Working Group for the development of the document CX/FA 08/40/6, Proposed Draft Revision of The Food Category System of the General Standard for Food Additives.

Australia is pleased to provide the following comments in respect of the second purpose of the work, the implications for food category 02.2.1.2 (Margarine and similar products) of the revocation of the Codex standards for margarine (Codex Stan 32-1981) and of minarine (Codex Stan 135-1981), and the adoption of the Codex Standard for Fat Spreads and Blended Spreads (Codex Stan 256-2007).

General Comments:

Australia supports the proposed changes to the food category system of the GSFA. The proposal aligns GSFA food category 2.2.1 with the Codex Standard for Butter (Codex Standard A-1-1971), and food category 2.2.2 with the Codex standards for Fat Spreads and Blended Spreads (Codex Stan 256-2007) and for Dairy Fat Spreads (Codex Stan 253-2006).

We note that while the proposed changes will assist the eventual integration of additive provisions specified in commodity standards CXS-253 and CXS-256 into the GSFA, there will, in the interim, continue to be inconsistencies between the GSFA and commodity standard permissions for products conforming to the proposed food category 2.2.2.

Australia seeks confirmation that Table 3 additives will continue to be permitted in products in category 2.2.2. While this can be inferred, it is not explicitly stated in the agenda paper.

As the proposed category 2.2.2 will encompass products standardised under both the Codex Standard for Fat Spreads and Blended Spreads and the Codex Standard for Dairy Fat Spreads, the proposal to title the category Fat Spreads potentially introduces confusion. Australia proposes that food category 2.2.2 be titled Fat Spreads, Dairy Fat Spreads and Blended Spreads in order to more accurately reflect the scope of products included within the category.

Brazil:

Brazil would like to relight our request to include a category for “fat free soybean flour”, “textured soybean protein”, “concentrated soybean protein”, “isolated soybean protein” and “soybean extract”. Although the subcategory 06.8.8 Other soybean protein products was included in this document, we consider that the title should be 06.8.8 Soybean protein products.

Besides, Brazil has the following comment:

12.9.2.3 Other soybean sauce:

Non-emulsified sauce made from fermented soybean sauce, with or without sugar, with or without caramelization process, non-emulsified sauce made from mixture of fermented and non fermented soybean sauce, and fermented sauce and hydrolyzed protein.

Justification: According to CX/PFV 04/22/08 (Proposed Draft Codex Standard for Soy Sauce), the definition of a soybean sauce is: soy sauce is a clear liquid seasoning obtained by fermentation of soybeans and/or by hydrolysis of vegetable proteins.

Optional ingredients for soy sauce, presented in that document, are the following:

- (a) Cereal grains
- (b) Vegetable proteins
- (c) Sugars
- (d) Vinegar
- (e) Sweet rice wines
- (f) Distilled alcohol of agricultural origin
- (g) Salt
- (h) Hydrolyzed Vegetable Protein

Japan:

Japan appreciates Indonesia's excellent work for the preparation of the Draft Revision of the Food Category System of the General Standard for Food Additive. Japan supports the content of the Draft in general, however, Japan provide the following specific comments. Struck-through texts indicate proposed deletion and bold texts indicate proposed addition.

06.8.1 Soybean-based milk / beverages:

Products prepared from dried soybeans that are soaked in water, pureed, ~~diluted with water~~, boiled and strained, or prepared from soybean flour, soybean concentrate, or soybean isolate. **This product is Soybean milk (e.g., tonyu)** ~~Soybean-based beverages which~~ may be consumed as is, **and this category also includes all ready-to-drink flavoured and aromatized soybean milk.** Also soybean milk is used to prepare other soybean products, such as those in food categories 06.8.2 (Soybean-based beverage milk 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 protein, such as soybean-based beverage milk 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 **soybean curd tofu**.

(Rationale)

In accordance with the section 5 b) of the General Standard for Food Additives (GSFA), we believe that the term “soybean milk” can be used in this category. At least, we can find similar dairy terms in several food categories as follows:

- vegetable cream (02.3 Fat emulsions mainly of type oil-in-water, including mixed and/or flavoured products based on fat emulsions)
- apple butter (04.1.2.6 Fruit-based spreads excluding products of food category 04.1.2.5)

- peanut butter, other nut butter, cashew butter and pumpkin butter (04.2.2.5 Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads)
- salad cream (12.6.1 Emulsified sauces)

According to the section 5: Food Category System of the GSFA, the food category system is a tool for assigning food additive uses and the food category descriptors are not to be legal product designations nor are they intended for labeling purposes. Therefore, we believe that terms as marketed should be used in the food category system, so are those terms described above.

Soybean milk is produced by soaking dry soybeans and grinding them with water, which is consumed as is, or flavourings such as fruit juice and vegetables juice are added to produce the flavoured and aromatized soybean milk beverages. Soybean milk is also used to prepare other soybean products such as soybean curd products and soybean milk film. Those products are recognized as traditional foods especially in Asian countries and as substitutes for dairy milk all over the world. Thus, we consider that the proposed amended title of this food category is appropriate because the title encompasses soybean milk and all soybean milk based beverages.

We note that CCASIA is considering the Proposed Draft Standard for Non Fermented Soybean Products in which Soybean milk / beverages is included as one of categories in its scope (para. 102 ALINORM 07/30/15).

06.8.2 Soybean-based beverage film Soybean milk film:

Film formed on the surface of boiling soybean-based beverage ~~milk~~ that is dried. It may be deep-fried or softened in water prior to use in soups or poached food. Also known as *fuzhu* or *yuba*.

(Rationale)

The term “soybean-based beverage” encompasses soybean milk and all other soybean milk based beverages, this term should not be used for this category. We believe that the term “soybean-based beverage film” does not describe the accurate characteristic of this product and would mislead or confuse consumers.

06.8.3 Soybean curd (tofu):

Soybean curd is prepared from dried soybeans that are soaked in water, pureed, and strained to produce soybean-based beverage ~~milk~~, which is then made into a curd with a coagulant, separated from the whey, and placed in a mold, ~~and lightly pressed. When the tofu is set, it is immersed in water and cut.~~ Soybean curds may be of a variety of textures (e.g., soft, semi-firm, firm).

(Rationale)

Please refer to our comments for the category 06.8.2.

IMFA :

Further to the adoption of the new Standard for Fat Spreads and Blended Fat spreads (CODEX STAN 256 – 2007), the Food Category System for the Codex General Standard for Food Additives (GSFA) is submitted to revision in order to clarify the implication for food category 02.2.1.2 (Margarine and similar products) and food category 02.2.1.3 (Blends of butter and margarine) within the Food category 02.2.1 (Emulsions containing at least 80% fat) as well as for Food category 02.2.2 (Emulsions containing less than 80% fat), in light of the revocation of the Codex Standards for Margarine (CODEX STAN 32-1981) and for Minarine (CODEX STAN 135-1981) and the adoption of the Codex Standard for Fat Spreads and Blended Spreads (CODEX STAN 256-2007).

IFMA-IMACE is submitting the following general and specific comments:

1. IFMA-IMACE agrees with the proposed revision for the category titles in 02.2 and the revision of the food category descriptor in 02.2.2. Keeping in mind the proposed simplification, we however would like to emphasize, as also mentioned in the GSFA that “the food category descriptors are not to be legal product designations nor are they intended for labelling purposes”.

IFMA-IMACE recognize the overall aim of the simplification exercise, however we are surprised that the same consolidation exercise has not been carried out in some of the other categories, such as in category 06.8 (Soybean products). IFMA-IMACE is of the opinion that this risks to create a substantial imbalance in the whole food category system.

2. On paragraph 3 of the Document CX/FA08/40/6, the second purpose, as it is proposed, seems not specific enough:

Indeed the category 02.2.1.2 (Margarine and similar products) is not the sole category that needs clarifications. The food category 02.2.1.3 (Blends of butter and margarine) within the Food category 02.2.1 (Emulsions containing at least 80% fat) as well as the Food Category 02.2.2 (Emulsions containing less than 80% fat) should also benefit from this clarification.

Those three categories are proposed to be put together within the new category 02.2.2 (Fat Spreads).

Consequently, IFMA-IMACE proposes to complete point 2) of the paragraph 3 as follows: “To clarify the implication for food category 02.2.1.2 (Margarine and similar products) **and food category 02.2.1.3 (Blends of butter and margarine) within the Food category 02.2.1 (Emulsions containing at least 80% fat) as well as for Food category 02.2.2 (Emulsions containing less than 80% fat)**, in light of the revocation of the Codex Standards for Margarine (CODEX STAN 32-1981) and for Minarine (CODEX STAN 135-1981) and the adoption of the Codex Standard for Fat Spreads and Blended Spreads (CODEX STAN 256-2007).

3. Furthermore, regarding “Part IV: Consequential changes to GSFA”, IFMA-IMACE regrets the lack of clarity of the proposed paragraph 21 of the Document CX/FA 08/40/6 (**Food category 02.2.2 Fat Spreads**):

- “The current adopted, draft (Step 6 &7) and proposed draft (step 3&4) food additive provisions in food category 02.2.2 “Fats Spreads” in Tables 1 & 2 of the GSFA will be maintained.”

IMACE-IFMA requests the guarantee that all the additives currently adopted in the new Standard for Fat Spreads and Blended Fat Spreads (CODEX STAN 256 -2007) are exhaustively listed in Table 1 and 2 of GSFA, under the new proposed category 02.2.2 “Fat Spreads” and not only those in the current food category 02.2.2 (Emulsions containing less than 80% fat). Of course, the draft (step 6 or 7) and proposed draft (step 3 or 4) food additive provisions should also be maintained.

To avoid any doubt, IMACE-IFMA proposes the following amendment to the paragraph 21:

“The current adopted, draft (Step 6 & 7) and proposed draft (step 3 & 4) food additive provisions in the food category 02.2.1.2, 2.2.1.3 and 02.2.2 will be maintained under the new proposed category 02.2.2 “Fats Spreads” in Tables 1 & 2 of the GSFA”.

In conclusion, IFMA-IMACE invites the Codex Committee for Food additives to adapt the proposal, in order to guarantee for the new proposed food category 02.2.2 “Fat Spreads” not only to maintain the availability of all the food additives in Table 1 and 2 that are adopted in the new Standard for Fat Spreads and Blended Fat Spreads but also to carry on working on the draft and proposed draft food additives provisions that are currently under revision.