

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
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Agenda Item 7

CX/PFV 12/26/7-Add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

26th Session
Montego Bay, Jamaica,
15 – 19 October 2012

Comments on the

FOOD ADDITIVE PROVISIONS FOR PROCESSED FRUITS AND VEGETABLES:
ADDITIONAL PROVISIONS FOR INCLUSION IN SELECTED ADOPTED AND STANDARDS UNDER DEVELOPMENT

Comments Submitted by:

Brazil, Costa Rica, Iran, United States

BRAZIL

In regard to the aforementioned draft standard, Brazil would like to congratulate UE and USA efforts to elaborate the recommendations on food additives applied to selected Standards on Processed Fruits and Vegetables, and to share some specific comments.

Specific Comments

1. DESICCATED COCONUT:

ANTIOXIDANTS: In Brazil, only INS 330 – citric acid is used, at GMP level, as stated in CODEX STAN 177-1991. Other antioxidants included in table 3 of the GSFA are not considered to be technologically efficient.

PRESERVATIVES: In regards to preservatives, only sulfites are used. Other compounds included in table 3 of the GSFA are not considered to be technologically efficient. Moreover, the provision for sulfites under food category 04.1.2.2 – Dried Fruit of the GSFA is:

Additive	INS	Step	Year	Max level	Notes
SULFITES	220-225, 227, 228, 539	Adopted	2006	1000 mg/kg	44, 135 & 218

Note 44 - As residual SO₂.

Note 135 - Except for use in dried apricots at 2000 mg/kg, bleached raisins at 1500 mg/kg, **desiccated coconut at 200 mg/kg and coconut from which oil has been partially extracted at 50 mg/kg.**

Note 218 - Only sulfites can be used as preservatives and antioxidants in the products covered by the Standard for Desiccated Coconut (CODEX STAN 177-1991).

3. CERTAIN CANNED FRUITS

Brazil would like to clarify that category 04.2.2.3 on the recommendations of the eWG may not completely suit these products.

The description of this category limits its application to products prepared by treating raw vegetables with salt solution excluding fermented soybean products, which is not considered the case of canned fruits.

It is considered more appropriate to rely on category 04.1.2.4 – Canned or bottled (pasteurized) fruit - Fully preserved product in which fresh fruit is cleaned and placed in cans or jars with natural juice or sugar syrup (including artificially sweetened syrup) and heat-sterilized or pasteurized. Includes products processed in retort pouches. Examples include: canned fruit salad, and applesauce in jars.

4. PRESERVED TOMATOES

The acidity regulators recommended for inclusion on the report of the eWG are listed on table 3 of the GSFA.

General reference to acidity regulators listed on Table 3 of the General Standard for Food Additives could be included in section 4, as it is recommended for firming agents, to be acceptable for use in foods conforming to this standard.

COSTA RICA

Costa Rica appreciates the opportunity to provide these comments:

Regarding CX/PFV 12/26/8, Costa Rica supports the inclusion of additives and the use of categories for all types of products.

However, we urge the Committee to continue working in accordance with the request from the Codex Committee on Food Additives (CCFA) not to include lists of additives in specific commodity standards but to refer to the General Standard for Food Additives.

IRAN

We think there is technological justification for use of Antioxidant and preservative for Desiccated Coconut. The use of food additives with the functional classes of antioxidants and preservatives are technologically justified. For Desiccated coconut we only propose antioxidants with GMP level and disagree with use of benzoates as preservative, because there is no advantage in use of benzoates in PH of Desiccated coconut, but we have no objection in use of tartrates.

Table olives:

Acidity regulators, antioxidants, firming agents, flavour enhancers, preservatives, thickeners used in accordance with Tables 1 and 2 of the Codex General Standard of Food Additives in food category 04.2.2.3 or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard." We do not support the addition of colour retention agent in table olives.

We think there is no technological need could be identified in table olives for adipates, sodium diacetate, aluminium ammonium sulphate and propylene glycol alginate. Iran disagree with the use of Aluminium in this category and we believe other stated additives can be used as an adequate replacement.

Acidity regulators are currently reviewed for use as horizontal approach in GSFA, but this need to be concluded in GSFA and members of CCFA acknowledge before it can be adopted.

Before CCFA can adopt the firming agent for calcium lactate, this technological purpose should be added to INS with some proper justification from CCPFV, then CCFA can ask GSFA to classify calcium lactate as a firming agent in Table 3 of the GSFA.

We disagree with using colour retention agent in this category and we believe that mislead the consumers. We think there is there is a technological need for sodium alginate, carrageenan, carob bean gum, guar gum, and xanthan gum as thickeners in this category as well.

Preserved tomatoes:

We agree on use of firming agents in Table 3 of GSFA in this category because they are all safe for use in general. We agree on current food additive provisions in the standard; the eWG concluded that citric acid, sodium dihydrogen citrate, trisodium citrate, potassium dihydrogen citrate, tripotassium citrate, calcium citrates, and glucono delta-lactone are needed as acidity regulators in preserved tomatoes.

We do not support the use of that hydrochloric acid (INS 507) as acidity regulator in this commodity and all stated commodities stated in this document. We agree on the use of calcium lactate, calcium citrates and calcium chlorides are needed as firming agents in preserved tomatoes, and do not support the use of other firming agents in 04.2.2.4. or Table 3 of the GSFA.

Processed tomato concentrates:

We agree on the use of Acidity regulators in section 4.1 and firming agents listed in Table 3 of the General Standard for Food Additives for this food category as well.

Pickled fruits and vegetables

Since the food categories in the Annex to Table 3 are excluded from the general conditions of Table 3, meaning that only those food additives that are listed in Tables 1 and 2 for food category 04.2.2.7 are permitted for use. We agree on the use of acidity regulators listed in table 1 and 2 with ML, Please note that based on Horizontal approach most of acidity regulators mentioned in table 3 can also be used in this commodity. Since there is a need for polydimethylsiloxane as an antifoaming agent in pickled fruits and vegetables, we support that. We support the use of Antioxidant and firming agents listed in table 3 of GSFA in this commodity group. We disagree with use of colours in this commodity because it misleads the consumers. We agree on the use of need for sorbates, and sulfites as preservatives in pickled fruits and vegetables. We do not support the use of intensive sweeteners of acesulfame potassium, aspartame, saccharins in pickled fruits and vegetables.

UNITED STATES

The United States is pleased to submit the following comments on the CCPFV food additive e-working group (e-WG) report titled "Food Additive Provisions for Processed Fruits and Vegetables: Additional Provisions for Inclusion in Selected Adopted and Standards under Development" (CX/PFV 12/26/7).

General Comments:

The United States commends the work of the CCPFV Food Additives e-WG led by the European Union and Co-chaired by the US. This e-WG Report highlights the dilemma posed by CCPFV seeking to re-examine all food additives listed in the Codex General Standard for Food Additives (GSFA; CODEX STAN 192-1995) and to provide justification for their use in every CCPFV standard.

Specific Comments:

Relevance of CCFA and/or GSFA

The US is concerned that the CCPFV-food additives working group detailed assessment of every food additive in their applicable functional classes for possible inclusion in its standards appears to question CCFA expertise and the relevance of the GSFA. Moreover, this work requires significant CCPFV resources that may be better spent addressing issues that have not already been addressed by other Codex committees.

Low CCPFV membership participation

Though membership in Codex working groups are open to all members, the very low level CCPFV member participation in this working group may pose legitimacy challenges to the working group's report. Bearing in mind the 25th CCPFV Session was attended by 70 delegates from 26 Member countries, 1 Member Organization and Observers from 3 international organizations; contrastingly, a combined total of less than ten CCPFV member countries and organization participated in proceedings (by submitting written comments) at any time. It is noteworthy to indicate the dissonance between the rhetorical level of discussion on food additives during the CCPFV plenary session and the low level of participation in the food additives eWG. This lack of participation can be interpreted as:

- The task assigned to the eWG was either not relevant or too complex.
- Rather than re-examining every food additive in the GSFA, a simpler approach similar to that outlined in the Codex Procedural Manual (i.e., general reference to the GSFA) to address food additives provisions in CCPFV standards is needed.
- Satisfaction by CCPFV general membership that this issue is appropriately addressed in the Codex Procedural Manual.
- A failure within the CCPFV to communicate the importance of this work to its members.

Food additives in Step Process where "no technological need was identified"

The food additive eWG report states that the eWG did not receive comments on certain food additives in the Step Process and therefore "no technological need could be identified." The US believes that these food additives may be used by industry and that further input on technological need should be solicited. Moreover, other food additives listed in the GSFA have been omitted in certain standards based on comments from one delegation and/or industry group. This omission may be unwarranted and can be potentially costly to industry and disruptive to trade.

The e-WG partial execution of its mandate

The e-WG failed to execute the last section of its mandate as indicated in the following (paragraph 108) of the CCPFV 25th Session report (REP11/PFV):

"The Committee requested the Working Group to look into the food additive provisions within the framework of the General Standard with a view to establishing a general reference to the GSFA when feasible and to provide justification in light of section 3 of the preamble of the GSFA for exceptions to the general reference if/when such reference was not appropriate."

The establishment of a method for handling food additives section of future CCPFV standards was not addressed. The e-WG limited its deliberation to standards requiring resolution of food additives issues and three standards ongoing revision. Indications are unless the CCPFV comprehensively resolves this matter henceforth, the food additive section of CCPFV standards will continue to be plagued by rhetoric that prolong their development and adoption.