

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
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World Health
Organization

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Agenda Item 4(b)

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

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Comments at Step 3 on the:

PROPOSED DRAFT ANNEXES ON SPECIFIC QUICK FROZEN VEGETABLES (Draft Standard for Certain Quick Frozen Vegetables)

Submitted by:

Ghana, South Africa, IFFA, IGTC

Ghana

General Comments

Ghana welcomes the opportunity to submit comments on the Proposed Draft Annexes for quick Frozen Vegetables. We appreciate the comprehensive work done by the eWG.

We wish to propose that, Defect Tolerance for Annex I to Annex XI in the draft be expressed in percentage by number to ensure consistency.

SPECIFIC COMMENTS

ANNEX 111: CARROTS

Section 1.2.3 Sizing

Table 1: Sizing

Ghana wishes to propose the table below:

Size Designation	Diameter
Specification for cylindrical cultivars	
(a) Small	6 < 23
b) Medium	23 – 27 mm
(c) Large	Greater than 27 mm
Specification for conical cultivars	
(a) Small	10 < 30 mm
(b) Medium	30 - 36 mm
(c) Large	Greater than 36 mm
Specification for spherical cultivars	
(a) Very small	Less than 18 mm
(b) Small	18 < 22 mm
(c) Medium	22 < 27 mm
(d) Large	27 < 35 mm
(e) Extra large	Over 35 mm

Rationale: The introduction of the less than is to prevent overlapping in the diameter of the different sizes.

Section 2.2.3 Definition of visual defects

(a) **Extraneous Vegetable Material** - Harmless vegetable material **[other than carrot roots]** which ~~does not consist of Material (E.V.M.) carrot roots.~~

(g) **Cracked** - Cracks greater than 2 ~~[3]~~ mm wide or other splits which detract materially from the appearance of the product (Styles: "whole", "finger" and "sliced").

Rationale: Ghana proposes that 2mm wide crack be maintained as percentage of crack builds up when the crack is 3mm. Also, a wider crack will expose the carrot to contamination.

Section 2.2.5 Defects and Allowance

Ghana wishes to propose that the original tables (1 & 2) be maintained but with the following amendments from the proposed new tables.

- Merge cell for "Defect" and "Categories" to read "Defect Categories"
- Proposed maximum allowance of 22% defect by number to represent Category B and proposal for maximum allowance for category A defect be solicited.

ANNEXE VII: GREEN BEANS AND WAX BEANS

SPECIFIC COMMENTS

Section 2.2.2 Definition of Visual Defects

(d) **Minor blemish:** Each piece blemished due to insect or pathological damage affecting an area greater than a 3 mm **[not exceeding 6mm]** diameter circle, ~~2 mm to 4 mm~~ **[less than 2mm]** for the "extra small" size or blemished by other means to a degree which seriously detracts from its appearance.

Section 2.2.4.1 Presentation

(b) If presented as size graded, the product shall contain not less than 80% by number of bean pods of the declared size. ~~or smaller sizes. Of the 20% by number which may be of larger sizes, not more than a quarter may be of the second size larger and none may be larger than the second size larger~~ **[Of the remaining 20%, not more than 10% shall be smaller than the declared size].**

Section 2.2.4.2 Visual defects

Comments: Table 2: proposal for additional technological purposes

Ghana does not agree with the introduction of a new table for visual defects as proposed table does not categorize defects and tolerance is unclear.

South Africa

ANNEX I: BROCCOLI

2.2 QUALITY FACTORS

SPECIFIC COMMENTS

Clause 2.2.1 (g)

South Africa proposes that the clause be amended to read as follows:

(g) ~~overmatured flowered~~ or poorly developed units;

RATIONALE:

To align the wording used with the definition in clause 2.2.2 (g), Definition of Visual Defects.

Clause 2.2.2 (c)

Add "s" at the end of the word 'Fragment'

(c) Fragments (for spears and florets) – means pieces less than 20 mm in length for spears and weighing less than 5 g for florets.

RATIONALE:

Typographical error.

ANNEX II: BRUSSELS SPROUTS

2.2 QUALITY FACTORS

SPECIFIC COMMENTSClause 2.2.2 (d)

South Africa proposes that the clause be amended to read as follows:

- (d) *Perforated leaves* (by insects): A sprout with one or more surface perforations (~~due to insects, etc~~), larger than 6 mm in diameter, showing scar tissue at the edge of the perforation(s);

RATIONALE:

It is already stated in brackets at the beginning of the definition that the perforation is limited to insect damage and therefore the repetition in the sentence is not necessary.

ANNEX III: CARROTS

1.2 PRESENTATION

SPECIFIC COMMENTSClause 1.2.2 (f)

South Africa proposes that the clause be amended to read as follows:

- (d) *Shoestring or Julienne*: Carrots cut longitudinally, either smooth or corrugated, into strips. Not less than 25 mm in length and the cross section shall not exceed 6 mm be at least 5 mm but not exceeding 10 mm (measured at the longest side of the cross section);

RATIONALE:

'Small pieces' for these styles are defined under section 2.2.3. Definition of Visual Defects as units less than 25 mm long, therefore the minimum length should be set at 25 mm. Due to the variation in shape within certain long varieties of carrots, provision should also be made for a variation in the cross section of units, but at the same time minimum and maximum permissible limits should be prescribed to ensure uniformity within the same container.

ANNEX IV: CAULIFLOWER

1.2 PRESENTATION

SPECIFIC COMMENTSClause 1.2.1 (b)

South Africa proposes that the clause be amended to read as follows:

- (b) *Split*: The whole head, cut vertically into two or more sections and which may have attached small, tender, modified leaves;

RATIONALE:

Splits are merely the whole heads cut vertically into smaller units and since small, tender, modified leaves are allowed for in the case of the style Whole, it shall also be permitted in the case of the case of the style Split.

ANNEX IX: PEAS

2.2 QUALITY FACTORS

SPECIFIC COMMENTSClause 2.2.3 (a)

South Africa proposes that the clause be amended to read as follows:

- (a) *Blonde Peas* means peas which are yellow, cream or white but which are edible (that is, not sour or rotted).

RATIONALE:

Cream coloured peas (i.e. neither white nor yellow) may also be present from time to time and by including this specific colour in the definition as well, the total spectrum of 'blonde peas' is covered.

ANNEX XI: WHOLE KERNEL CORN

2.2 QUALITY FACTORS

SPECIFIC COMMENTSClause 2.2.5 (a) Pieces of cob – maximum tolerance

South Africa proposes that the clause be amended to read as follows:

(a) Pieces of cob – maximum tolerance ~~0.6 cubic centimetres~~ 3 pieces

RATIONALE:

Expressing the maximum permissible tolerance in units/pieces instead of cm³ will facilitate inspection. Although the presence of pieces of cob is not always avoidable, we believe that a maximum tolerance of 3 pieces in a sample unit of 250g can be regarded as still acceptable.

IFFA

The International Frozen Food Association (IFFA) advocates on behalf of the frozen food sector worldwide. IFFA's membership includes frozen food companies, associations, individuals and suppliers. IFFA members share a common belief in the future of frozen food trade and have a desire to maintain open discussions on trade, technology, legislation and regulation.

IFFA is a non-governmental organization that has observer status in Codex Alimentarius. IFFA strongly supports the work of Codex and promotes global harmonization of science-based standards and policies. IFFA also works to ensure equity in the international trade of frozen food products, possible only through the harmonization of global standards.

IFFA thanks the United States delegation for its work on the draft Revised Codex Standard for Certain Quick Frozen Vegetables. IFFA welcomes this opportunity to review the current draft and is pleased to provide the following additional comments.

IFFA suggestions are noted as additions in bold and deletions in strikethrough:

Annex III: CARROTS

1.2.2 Styles:

(f) Shoestring or Julienne: carrots cut longitudinally, either smooth or corrugated, into strips of 9.5 mm x 9.5 mm x 38 mm. The cross section shall not exceed 6 mm (measured at the longest side of the cross section).

Recommendation: IFFA recommends including the dimensions of the strip and increasing the length of the cross-section. In some regions, Julienne styled carrots measure at: 9.5 mm x 9.5 mm x 38 mm.

2.2.3 Definition of Visual Defects

Defect	Definition
Cracked	Cracks greater than 3 2 mm wide or other splits which detract materially from the appearance of the product (Styles: Whole, Finger and sliced).

Recommendation: IFFA recommends increasing the size of the crack to 3 mm before it is considered a visual defect. The 2 mm requirements seem too prescriptive and too small, especially if the crack is not deep.

2.2.3. Definition of Visual Defects

Recommendation: IFFA recommends that "woody/fibrous/seeder/bolter" carrots be added to the list of defects in Table 1. Carrots, under poor growing conditions such as high temperatures, low water, etc. can bolt. This bolting can cause the carrot texture to become woody or fibrous. The bolting is very obvious in the field as the carrot tops get tall and flower. Once the carrots are harvested, it is hard to tell as the carrots do not appear different. The core of the carrot is what becomes woody.

2.2.5 Defects and Allowances

Recommendation: IFFA supports the changes to defect tolerances as reflected in proposed Table 1. IFFA recommends that total max defect allowance for diced/double diced/shoestring carrots should be set at no more than 10% rather than the suggested 20%.

ANNEX V: CORN-ON-THE-COB

1.1 PRODUCT DEFINITION

Corn-on-the-cob can be of the following types:

(a) Option 1: Sweet varieties - means kernels (or grains) of corn that provide higher naturally occurring sugar, and/or crisper texture (maybe yellow, white or combination of each) typical for the variety. These varieties may be slightly darker in colour, and some varieties have slightly tougher pericarp (kernel skin) than conventional sweet corn.

(b) Option 1: Non sweet varieties - means kernels of sweet corn that convert sugars to starch by going through distinct stages of maturity-- milk, cream, then dough stages.

Recommendation: IFFA supports Option 1 of the proposed changes which IFFA believes best describes both normal and super sweet type varieties.

2.2.1 General Requirements

With respect to visual defects subject to a tolerance, quick frozen corn-on-the-cob shall be:

(a) of reasonably uniform white, cream, to yellow (golden) to darker yellow colour; except for mixed colour varieties

Recommendation: IFFA recommends the addition of "darker yellow" in the above descriptor. The color of Super Sweet varieties is darker yellow than the standard golden color.

2.1.2 Analytical Requirements

(a) The Alcohol Insoluble Solids (A.I.S.) content of the whole kernels detached from the cob shall not exceed 32% mm.

(b) The total soluble solids content of the juice pressed from the kernels by refractometer at 20°C, uncorrected for acidity and read as oBrix on the International Sucrose Scale shall may be not less more than 210o Brix for sweet corn varieties and less than 20o Brix for non-sweet varieties.

(c) Other qualitative measures to assess tenderness and maturity may likewise be considered.

Comment: Some processors do not assess maturity by testing for AIS. Soluble solids/brix as a grading factor may likewise not be used for maturity.

Additionally, Brix is not true test of sweetness, as starch interferes with the measurement. In the past, when Brix testing was done, non-sweet varieties were around 20o, and interestingly super sweet was half of that, around 10o. It's higher for the non-sweet varieties because starch (in addition to sugar content) is measured whereas only sugars are measured for the super sweet varieties. Brix is a measurement of the sugar (sucrose) content of an aqueous solution. If the solution contains dissolved solids (starch) other than pure sucrose, then the Brix only approximates the dissolved solid content. Thus, Brix is not a true test for sweetness due to the sugar versus starch content. Furthermore, sweetness levels vary during the processing season challenging the need to assess sweetness. As long as there is some sweetness, and no off-flavors, then the frozen corn product is acceptable.

Recommendation 1: IFFA recommends that this Codex standard elaborate further the methodology to assess tenderness and maturity, and provide a third option that allows for a qualitative assessment.

Recommendation 2: IFFA recommends sweetness assessment not be limited to the brix methodology.

2.1.3 Definition of Visual Defects

(a) Uniform white, cream, to yellow (golden) to darker yellow colour means, that all kernels on one ear are of the same colour and that the different units in one standard sample unit are of the same colour.

Recommendation: IFFA supports the addition of the "darker yellow" color in the above descriptor. The color of Super Sweet varieties is darker yellow than the standard golden color.

ANNEX VI: FRENCH FRIED POTATOES

1.2.1.2 Dimensions of the cross section

The cross sectional dimensions of strips of quick frozen French fried potatoes that have been cut on all four sides (Styles a – c above) shall not be less than 5 mm when measured in the frozen condition. The quick frozen French fried potatoes within each pack shall be of similar cross sectional dimensions, except for style e; other shapes may include "random cuts", "Julienne cuts", "lattice" cuts, etc.

Recommendation: IFFA supports the above edits made to Section 1.2.1.2. for the following reasons: A "julienne" cut is typically less than 5 mm in cross section. There is meaningful volume of French fries in global commerce with a smaller cross section.

2.2.2 Analytical Requirements

2.2.2.1. The fat or oil extracted from the product shall have a free fatty acid content of not more than 3.0 1.5% m/m measured on an acid value basis – for example, as oleic acid or an equivalent fatty acid value based on the predominant fatty acid in the fat or oil.

Recommendation: IFFA supports setting a limit of 3.0% m/m for free fatty acid content in fats/oils extracted from the product. The limit of free fatty acid content needs to be higher than 1.5%. Frying oils today are very different than in the past. They have far less solids (saturated and/or trans) and thus are inherently less stable to heat. The 1.5% limit is no longer practical or reasonable. Additionally, the 3.0% m/m should be based on “acid value” not limited to a particular free fatty acid.

Section 3.2 FOOD ADDITIVES

The Codex General Standard for Food Additives (GSFA) (Codex Standard 192-1995) is to be the single authoritative international reference point for food additives. Section 3 should be aligned with GSFA Food Category 04.2.2.1. “Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds” as provisions within the GSFA reflect current industry practices. 1/ For example, while the Codex Commodity Codex Standard for Quick Frozen French Fried Potatoes (Codex Standard 114-1981) suggests uses of phosphates as sequestrants at 100 mg/kg (singly or in combination) expressed as P₂O₅, the GSFA in 2012 adopted uses in amounts of 5,000 mg/kg as phosphorus in potatoes only.

Recommendation 1: IFFA supports the listed food additive provisions in the Table, including those proposed to be added, except for Sodium Acid Pyrophosphate (SAP), which should be moved to the list of Processing Aids in 4.0. IFFA encourages the Committee to continue to reference the Codex General Standard on Food Additives (Codex Standard 192-1995) in Section 3.1.

Recommendation 2: IFFA recommends that phosphate uses should reflect GSFA provisions and revise the maximum level from 100 mg/kg singly or in combination (phosphates expressed as P₂O₅) to 5,000 mg/kg as phosphorus.

Recommendation 3: IFFA provides the following technological justification for the organic acids –

- Citric Acid is commonly utilized in as an Acidulant, Flavor and Sequestrant. The acid imparted by citric acid can provide pH buffering properties, stabilizing and enhancing emulsions, sour flavor notes and increased effectiveness of preservatives and antioxidants. The metal scavenging or sequestering effects of citric acid addition preserve natural colors and enhance the set of gels or films.
- Malic acid is also used as an Acidulant, Flavor and Sequestrant.
- Ascorbic Acid, while providing the same properties as Citric and Malic acids, is used primarily as an antioxidant.

Recommendation 4: IFFA recommends that food enzymes (e.g., asparaginase) be included in the list of food additives. For example, asparaginase can be used to help reduce the occurrence of acrylamide in the finished, cooked product.

Recommendation 5: IFFA recommends that Sodium Acid Pyrophosphate (SAP) be included in the list of processing aids.

Section 5.0 LABELLING/5.1. NAME OF THE PRODUCT

5.1.3 If the product is produced in accordance with Section 1.2.1.23. The label shall contain in close proximity to the words “French Fried Potatoes” such additional words or phrases that will avoid misleading or confusing the consumer.

Recommendation: IFFA believes reference to Section 1.2.1.3. in the proposed draft is a typographical error and should instead read 1.2.1.2. In the existing standard CODEX STAN 114-1981, under the labelling section, a similar provision (i.e., 6.1.3.) refers to Section 2.4.2 in that standard – Other Styles. In the current proposed draft, other styles are reflected in the descriptor of 1.2.1.2 Dimensions of the cross section, specifically: “other shapes may include “random cuts”, “Julienne cuts”, “lattice” cuts, etc.”

ANNEX VII: GREEN BEANS AND WAX BEANS

2.2.4.2. Visual Defects

Comment: The tolerances listed for “EVM” and “stem end” may be too restrictive for green beans. A snipper leaves a 2 mm stem end on a bean. The 6/kg tolerance can be easily exceeded unnecessarily putting these frozen green bean products out of specification rendering them defective. Stems are challenging for green beans. Further clarification is requested relative to how the tolerance numbers were derived.

Additionally, IFFA supports the inclusion of the “round or flat” type in proposed section 3.1.2. Some members process ‘Romano’ beans that are flat.

Recommendation: IFFA supports the proposed table for visual defects with the exception of the stem end as noted above.

ANNEX IX: PEAS

1.1.1 Types

(b) The product shall be presented as “peas” or may be presented as “garden peas” provided they meet the organoleptic and analytical characteristics of the type, e.g. “Kelvedon Wonder”, “Dark Skin Perfection” and others.

(c) When the peas are of sweet green wrinkled varieties or hybrids having similar characteristics, the name is “sweet green peas”.

Recommendation: IFFA recommends that type names should be removed. Peas/garden peas/sweet green peas are all the same in some regions regardless of varieties used.

^{1/} Codex General Standard on Food Additives - [Codex Standard 192-1995](#)

1.2.1 Sizing

1.2.1.2 If peas are size graded they shall conform to one of the two following systems of specifications for the size names. However, other size designations may be used.

Recommendation: IFFA recommends combining extra small, very small, and small in the proposal as some regions have a collective "petite" size of 7.1 – 8.7 mm, which may not meet the specifications as currently proposed.

Section 2.1.1. Other Permitted Ingredients

Recommendation: IFFA recommends that the addition of salt for use in processing should be reflected in this section.

ANNEX X: SPINACH

2.1.7 Defects and Allowances

Recommendation: IFFA can support Option 2 (France)- Table 1 "Whole leaf and cut leaf style", with the exception of tolerance for major discoloration which should be reduced to 15 from 20.

ANNEX XI: WHOLE KERNEL CORN

Similar to Annex V "Corn-on-the-Cob", analogous sections in this annex should address the super sweet varieties, the issue of tenderness and maturity of the kernels, analytical requirements, and visual defects.

1.1 PRODUCT DEFINITION

Quick frozen whole kernel corn is the product prepared from fresh, clean whole sound, succulent kernels of sweet corn species *Zea mays* L. convar. *saccharata* Koern of either the white or yellow varieties by removing husk and silk; by sorting, trimming and washing; and by sufficiently blanching before or after removal from the cob to ensure adequate stability of colour and flavour during normal marketing cycles.

Whole kernel corn can be of the following types:

(a) Sweet varieties - means kernels (or grains) of corn that provide higher naturally occurring sugar, and/or crisper texture (maybe yellow, white or combination of each) typical for the variety. These varieties may be slightly darker in colour, and some varieties have slightly tougher pericarp (kernel skin) than conventional sweet corn.

(b) Non sweet varieties - means kernels of sweet corn that convert sugars to starch by going through distinct stages of maturity-- milk, cream, then dough stages.

Recommendation: IFFA suggests adding the bolded text to product definition relative to corn generally, which would be consistent with Option 1 of the proposed changes in Annex V "Corn-on-the-cob". This best describes both normal and super sweet type varieties.

2.2.1 General Requirements

Quick frozen whole corn shall be:

(d) reasonably tender meaning that the kernels are in the cream stage of maturity and have a reasonably tender texture;

Recommendation: IFFA recommends that tenderness be elaborated further in this standard as suggested in bold above. This Standard does not adequately address tenderness and maturity, the most important attribute of kernel corn. There are differing classifications for tenderness:

- Tender means that the kernels are in the milk or early cream stage of maturity and have a tender texture;
- Reasonably tender means that the kernels are in the cream stage of maturity and have a reasonably tender texture.
- Fairly tender means that the kernels are in the early dough or dough stage and have a fairly tender texture.

2.2.2 Analytical Requirements

(a) The Alcohol Insoluble Solids (A.I.S.) content of the whole kernels detached from the cob shall not exceed 32% mm.

(b) The soluble solids content of the juice pressed from the kernels by refractometer at 20oC, uncorrected for acidity and read as degrees Brix on the International Sucrose Scale shall may be not less more than 210o Brix for sweet corn varieties and less than 20o Brix for non-sweet varieties.

(c) Other qualitative measures to assess tenderness and maturity may likewise be considered.

Comment: Some processors do not assess maturity by testing for AIS. Soluble solids/brix as a grading factor may likewise not be used for maturity.

Additionally, Brix is not true test of sweetness, as starch interferes with the measurement. In the past, when Brix testing was done, non-sweet varieties were around 20o, and interestingly super sweet was half of that, around 10o. It's higher for the non-sweet varieties because starch (in addition to sugar content) is measured whereas only sugars are measured for the super sweet varieties. Brix is a measurement of the sugar (sucrose) content of an aqueous solution. If the solution contains dissolved solids (starch) other than pure sucrose, then the Brix only approximates the dissolved solid content. Thus, Brix is not a true test for sweetness due to the sugar versus starch content. Furthermore, sweetness levels vary during the processing season challenging the need to assess sweetness. As long as there is some sweetness, and no off-flavors, then the frozen corn product is acceptable.

Recommendation 1: IFFA recommends that this Codex standard elaborate further the methodology to assess tenderness and maturity, and provide a third option that allows for a qualitative assessment.

Recommendation 2: IFFA recommends sweetness assessment not be limited to the brix methodology.

2.2.5 Defects and Allowances

Recommendation: IFFA can also support the proposed changes to defect tolerances as reflected in the "Defects" proposed table, as well as the (5) for minor damage/blemish in Table 1.

IGTC

The International Glutamate Technical Committee (IGTC) would like to thank the United States of America for the preparation of the documents. We would like to submit following comments.

(i) General Comments

The 46th CCFA recommended to allow use of MONOSODIUM L-GLUTAMATE (MSG) (INS 621) for Food Category 04.2.2.1 Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds at GMP level with the note 201 "For use in flavoured products only" at Step 8 and this recommendation was endorsed by 37th CAC.

Therefore, IGTC is of the opinion that if flavoured products are covered by certain commodity standard corresponding Food Category 04.2.2.1, MSG should be allowed as a food additive in that commodity standard to be consistent with food additive provision of the GSFA.

However, IGTC is not in the position that flavoured products should be included in those commodities standards of these Annexes.

(ii) Specific Comments

ANNEX I: BROCCOLI. ANNEX II: BRUSSELS SPROUTS and ANNEX V: CORN-ON-THE-COB.

We would like to propose below texts in the section **3. FOOD ADDITIVES** in these Annexes if flavoured products are covered by these standard.

~~None permitted.~~

3.1 The following food additives apply to the products covered by the Standard:

3.1.1 Flavour enhancer

<u>INS No.</u>	<u>Name of the Food Additive</u>	<u>Maximum Level</u>
<u>621</u>	<u>MONOSODIUM L-GLUTAMATE</u>	<u>GMP</u>

Rationale: If other ingredients such as spices, seasonings, butter, edible oils, named sauces and flavourings are allowed in the section 2.1.2 Other Permitted Ingredients in these standards, it can be considered that flavoured products are covered by these standards. Therefore, MSG should be allowed as a food additive to be consistent with food additive provision of the GSFA.

ANNEX III: CARROTS

We would like to propose below texts in the section "**2.1.2 Other Permitted Ingredients**" in this Annex.

(b) Aromatic herbs and spices as defined in the relevant Codex standards for spices and culinary herbs; ---- of the total drained vegetable ingredient.

Rationale: The Codex standard for spices and culinary herbs does not exist.

ANNEX VI: FRENCH FRIED POTATOES

We would like to propose below texts in the section

3. FOOD ADDITIVES in this Annex.

3.2 In addition, the following food additives apply to the products covered by the Standard:

INS No.	Food Additive	Maximum Level
<u>621</u>	<u>Flavour enhancers</u>	<u>GMP</u>

Rationale: Condiments and batters are permitted as optional Ingredients in the section **2.1.2 Optional Ingredients** in this standard. Therefore, it can be considered that flavoured products are covered by this standard. Permission of sweeteners also indicates that flavoured products are covered by this standard.

ANNEX IX: PEAS

We would like to propose below texts in the section **3. FOOD ADDITIVES** in this Annex.

3.1 The following food additives apply to the products covered by the Standard:

3.1.1 Flavour enhancer

INS No.	Name of the Food Additive	Maximum Level
<u>621</u>	<u>MONOSODIUM L-GLUTAMATE</u>	<u>GMP</u>

Rationale: flavourings are permitted in this standard, therefore, it can be considered that flavoured products are covered by this standard.

MSG is permitted for frozen peas in the USA and Japan.