

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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CX 5/10.2

CL 2019/34-CS  
April 2019

**TO** Codex Contact Points  
Contact Points of international organizations having observer status with Codex

**FROM** Secretariat,  
Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme

**SUBJECT** **Request for Comments: Analysis of Responses to CL 2018/80-CS: draft Standard for panela and/or common or vernacular name as known in each country (non – centrifuged sugar)**

**DEADLINE** 15 May 2019

**COMMENTS** **To:**  
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## BACKGROUND

1. As host country to the Codex Committee on Sugars (CCS), Colombia is pleased to present the status of the draft standard for “non-centrifuged dehydrated sugar cane juice” (see Annex 1), which is submitted for consideration for adoption at step 8 to the 42<sup>nd</sup> Session of the Codex Alimentarius Commission (CAC42).
2. The draft standard was returned to step 6 by CAC38 for comments and observations on aspects related to: name of the product, scope, chemical characteristics, labelling and methods of analysis.
3. CAC39 requested CCS clarify the scope of the standard and provide evidence about the international support regarding the scope defined in the draft standard. CCS would subsequently report on the findings to CAC40 in order to determine how to proceed further with this work e.g. discontinuation, finalization as a worldwide or regional standard.
4. CAC40 extended the work for one year and asked CCS to report to CAC41.
5. CAC41 extended the work for one more year and asked CCS to report to CAC42 and noted the possibility of holding a face-to-face meeting.
6. In compliance with the request and responding to CAC42, Colombia, as Chair of the CCS, submits for consideration the following explanatory notes and the proposal of the draft standard (Annex 1), after reviewing comments received from Brazil, Costa Rica, Cuba, Ecuador, Japan, Kenya, Thailand, Uganda and the United States of America, in response to CL 2018/80-CS (Annex 2).

## EXPLANATORY NOTES

### Name of the product

7. The title of the draft standard is adjusted, "Panela (common or vernacular name as known in each country)" to "Draft Codex standard for Panela and / or common or vernacular name as known in each country (Non–centrifuged sugar)".
8. The name of the product "panela" is kept, approved by 70% of the countries that provided their comments, considering that this name allows the consumer to differentiate the product from other products with similar appearance, but are not produced from *Saccharum* spp. or those that differ in the way they are processed or characteristics such as brown sugar and unrefined cane sugar (CXS 212-1999).

9. The proposal of "and / or common or vernacular name as known in each country" is adopted in order to offer each country the option of marketing the product with its distinctive name, this is a key factor for the product marketing because avoids ambiguity or confusion, at the same time preserves the recognition of the product by the consumer in different regions of the world, facilitates trade and allows to distinguish it from other centrifugal sugars.

10. The name of (non-centrifugal sugar) is added to the proposal, taking into account the recommendations from members, in order to clarify the nature of the product, avoid consumer confusion and adopt the FAO terminology.

11. The common name as it is known in each country is kept in a footer and the correction or inclusion requests made by Ecuador, Kenya and Uganda are accepted, regarding the name of the product as it is known in their countries.

### **Section 1 Scope**

12. The scope has been partially amended. The product name "**Panela (common or vernacular name as known in each country)**" has been adjusted to "**Panela and/or common or vernacular name as known in each country (non – centrifuged sugar)**".

13. In response to a reiterated comment from a member related to the products obtained from the rebuilding of its components, we expressed its purpose is to indicate that the product does not correspond under any circumstance to the one elaborated from the re-processing of the components of sugar cane juice *Saccharum* spp. or derived from it, such as sugar, molasses, syrups, among others, in order to avoid wrong practices, guaranteeing the product marketed is natural, a direct result of milling of sugar cane and not mislead the consumer by offering a product that proceeds from others already processed.

### **Section 2 Product Definition**

14. This section has been partially amended. The product name "Panela (common or vernacular name as known in each country)" has been adjusted to "Panela and/or common or vernacular name as known in each country (non – centrifuged sugar).

15. The slab presentation is removed and is included that a solid presentation of this product can be given in a mold of any shape and / or granulated, as indicated by a member.

16. The clarification about that this product is not purified or centrifuged and maintains its constitutive elements such as sucrose, glucose, fructose, phenols, flavonoids and vitamins is kept; since they are features and differentiating elements of the product, and even when the quantitative specifications are not mentioned in the physicochemical table of the section, it comes up from the definition accepted by the members that made comments to CL 2018/80-CS.

17. Moreover, it is clarified this product is different in its nature and composition to the sugars described in the *Standard for Sugars* (CXS 212-1999), which is produced and marketed in several countries of the world; for this reason the formulation of a standard that allows its differentiation from other sugars and protects the consumer, was proposed.

#### **Section 3.1.1 Basic ingredients**

18. This section does not change and either changes like a consequence of other section reviews. The proposal made by a member about modifying the basic ingredient to "Dry sugarcane juice of the genus *Saccharum* spp" is not accepted, because the basic ingredient of panela is the juice extracted from the sugarcane of the genus *Saccharum* spp, which is concentrated to obtain the product.

#### **Section 3.2.1 Colour**

19. This section is partially amended. The product name "Panela (common or vernacular name as known in each country)" has been adjusted to "Panela and/or common or vernacular name as known in each country (non – centrifuged sugar).

20. The other excerpts of this section do not present changes, but it is taken into consideration that this section was not requested for comments.

#### **Section 3.2.2 Flavor and Aroma**

21. This section is partially amended in response to a recommendation made by a member. The expression "And shall be free of unpleasant organoleptic characteristics" is deleted. It is taken into account that this section was not requested for comments.

### Section 3.2.3 Defects

22. The recommendation from a member was welcomed, this section is partially amended. The phrase "foreign matters, softening. It cannot be fermented or present fungus and insect attacks" has been replaced to the phrase "damage caused by microorganisms, presence of foreign matters, insects and/or fragments or softening". It is taken into account that this section was not requested for comments.

### Section 3.2.4 Physical and chemical characteristics

23. This section has been partially amended. The product name "Panela (common or vernacular name as known in each country)" has been adjusted to "Panela and/or common or vernacular name as known in each country (non – centrifuged sugar).

24. It is recalled again that the product composition in the draft standard is expressed on a dry basis. The above does not mean that the two indicated presentations, in mold and granulate, will cease containing moisture content.

25. As the previous version of the draft standard, only one table that gathers the requirements for ash, sucrose (% m/m), reducing sugars (% m/m) and proteins in% (N x 6.25) is included. Humidity is the only requirement that is included separately, constituting a differentiating factor of the presentation forms in mold and grain. The presentation in slab or mold, by its size and texture, normally does not have a similar moisture content to the granulated form. The recommendation of a member regarding moisture is welcomed.

26. On the other hand, Colombia expresses the increase on the research studies of panela and as a result has found that the delicate balance of all the natural components of cane juice when concentrated gives the panela organoleptic characteristics such a taste and smell unique to the product, which are modified or lost when removing or adding components during its production process, so that at the level of very low reducers, the nature of the product changes.

27. Thereby, when analyzing the formulation process of the standard and the comments made by some of the members that have been participating throughout this process, we understand that some members have manifested that the current draft standard is not covering all the "Non-centrifugal sugars", but they do recognize that Colombia and other countries have made important efforts to explain the differentiation of the product.

28. Therefore, Colombia recommends to study the alternative proposed by one member to "classify the sugars listed in the *Standard for Sugars* (CXS 212-1999) as centrifugal sugars and add another section for non-centrifugal sugars"; and thereby enable a general category that embraces all types of "non-centrifugal sugars", where the new non-centrifuged sugar products could be comprise and in which products with lower reducing sugar contents or products whose ingredients are not juice of sugarcane of the genus *Saccharum* spp are included as well.

- **Ash (% m/m):** The minimum value of 0.9 (% m/m) is held, without setting a maximum value. A point to note is that the ash with a minimum value, reflects the purpose of preserving the mineral content during the process, as elements that add a differentiating nutritional factor to the food, and are normally lost in a different process. The maximum value for ash is not included because of the high variability of the soils where sugar are is grown and the different programs for improving the soil fertility that several regions may implement.
- **Total sugars (saccharose) (% m/m):** The maximum value of 91 (% m / m) is retained, without setting a minimum value. A member, among other comments received, suggests a minimum value of 60% which hinders the balance of the components of the product and would imply a high value of reducing sugars, higher than 20%, a fact that would complicate the presentation of the product and its lifespan. However, we consider that by not placing a minimum value, the suggested value would be included.
- **Total sugars (reducing sugars) (% m/m):** CCS sets a minimum value of 5.3 (%m/m), without setting a maximum value. This value arises taking into account comments from some members and carrying out a technical review of several physicochemical characteristics of panela samples in mold and granulate, compiled from various sources in the country. This percentage is attributed to the pH of the juice, times and temperatures of cooking and creates, among other factors, an important organoleptic and nutritional differentiation compared to sugar, reason why it is neither considered technically nor commercially viable to leave a lower figure as it does not correspond to the nature of the product.
- **Proteins % (N x 6.25):** The minimum value of 0.2 (N x 6.25) proposed is maintained, taking into account that the content of proteins in nitrogen form is part of the differentiating factors of this product regarding to common sugar and its similar derivatives.

**Section 4 Food additives**

29. This section remains unchanged. This provision was not the subject of this request for comments, nor has it changed as a consequence of the revision of other sections.

**Section 5 Processing aids**

30. This section remains unchanged. This provision was not the subject of this request for comments, nor has it changed as a consequence of the revision of other sections.

**Section 6 Contaminants**

31. This section remains unchanged. This provision was not the subject of this request for comments, nor has it changed as a consequence of the revision of other sections.

**Section 7 Hygiene**

32. This section remains unchanged. This provision was not the subject of this request for comments, nor has it changed as a consequence of the revision of other sections.

**Section 8 Labelling**

33. This section has been partially amended. The product name “Panela (common or vernacular name as known in each country)” has been adjusted to “Panela and/or common or vernacular name as known in each country (non – centrifuged sugar). However, due to the possible differences in weight for the slab presentation of the product because of its hygroscopic characteristic, this section could be matter of reconsideration.

34. It is reiterated that this provision should be considered by the Codex Committee on Food Labeling (CCFL).

**Section 9 Methods of analysis and sampling**

35. This section remains unchanged. This provision was not subject to observations, neither changes as a consequence of the revision of other sections.

36. It is considered that this provision should be validated by the Codex Committee on Methods of Analysis and Sampling (CCMAS).

**REQUEST FOR COMMENTS**

37. Codex members and observers are invited to submit their comments on whether the revised draft standard presented in Annex 1 is ready for adoption at Step 8.

38. Comments should be submitted through or with a copy to the Codex Contact Point or Focal Point of the international organizations having observer status with Codex. Comments should be presented in Word file to facilitate their analysis and compilation.

## Annex I

**DRAFT CODEX STANDARD FOR PANELA AND/OR COMMON OR VERNACULAR NAME AS KNOWN  
IN EACH COUNTRY (NON – CENTRIFUGED SUGAR)<sup>1</sup>**

(at Step 8)

**1. SCOPE**

This Standard applies to Panela and/or common or vernacular name as known in each country (non – centrifuged sugar), as defined in section 2, intended for human consumption, including for catering purposes or pre-packaging as appropriate, as well as to the product intended for subsequent processing, where indicated. The standard does not cover products obtained from the reconstitution of its components.

**2. PRODUCT DEFINITION**

“Panela and/or common or vernacular name as known in each country (non – centrifuged sugar)” is the solid product in any shape and a mold presentation of any form and/or granulated, obtained from the evaporation and concentration of sugar cane juice of the genus *Saccharum* spp., non-centrifuged neither purified, which maintains its constituent elements, such as saccharose, glucose, fructose, phenols, flavonoids, minerals and vitamins. In no case this product is totally or partially made from sugars or syrups already processed.

**3. ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.1 COMPOSITION****3.1.1 Basic Ingredients**

Sugar cane juice of the genus *Saccharum* spp.

**3.2 QUALITY FACTORS****3.2.1 Color**

“Panela and/or common or vernacular name as known in each country (non – centrifuged sugar)” may have a color ranging from light to dark Brown, depending, among other aspects, on the sugar cane variety, the agro-ecological conditions of the harvest and the manufacture process technologies.

**3.2.2 Flavor and aroma**

The flavor and aroma shall be characteristic of the product.

**3.2.3 Defects**

The product shall be free from defects such as damage caused by microorganisms, presence of foreign matters, insects and/or fragments or softening.

**3.2.4 Physical and chemical characteristics**

Panela and/or common or vernacular name as known in each country (non – centrifuged sugar), shall fulfill the conditions shown in the following table as appropriate.

Requirement	COMPOSITION ON A DRY BASIS	
	Value	
	Minimum	Maximum
Ash (% m/m)	0,9	--
Saccharose (% m/m)	--	91
Reducing sugars (% m/m)	5,3	-
Proteins in % (N x 6,25)	0,2	-

<sup>1</sup> Common or vernacular names used for panela in other countries and regions: Chancaca (Chile, and Peru); Jaggery (Kenya, Uganda), Gur or Jaggery (India); Jaggery and Khandsari (South Asia); Mascabado (Philippines); Panela (Bolivia, Colombia, Ecuador, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and some countries of Central America); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Sweet tapa; Sweet Granulated (Costa Rica).

Moisture	Maximum
“Solid” style (%)	9,0
“Granulated” style (%)	5,0

**Note:** Moisture is a differentiating factor between ways of presentation and the final composition of the solids, in the product in mold and granulated.

#### 4. FOOD ADDITIVES

No additives are allowed to be use in the products covered by this Standard.

#### 5. PROCESSING AIDS

The processing aids used for products covered by this Standard shall comply with the *Guidelines on Substances Used as Processing Aids* (CXG 75-2010).

#### 6. CONTAMINANTS

6.1 The products covered by this standard shall comply with the maximum levels of the *General Standard for Contaminants and Toxins in Foods and Feeds* (CXS 193-1995).

6.2 The products covered by this standard shall comply with the maximum residue limits for pesticides established by the Codex Alimentarius Commission.

#### 7. HYGIENE

7.1 It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the *General Principles of Food Hygiene* (CXC 1-1969) and other relevant Codex texts such as codex guidelines of hygienic practices and codes of practice.

7.2 The product should comply with any microbiological criteria established in accordance with the Principles and *Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CXG 21-1997).

#### 8. LABELLING

The product regulated by the provisions of this standard shall be labelled in accordance with the *General Standard for the Labelling of Pre-packaged Foods* (CXS 1-1985). The following specific provisions also apply.

##### 8.1 NAME OF THE PRODUCT

8.1.1 The product name “panela and/or common or vernacular name as known in each country (non – centrifuged sugar)” could be followed by the common or vernacular name accepted in the country of origin or retail sale.

8.1.2 The style of presentation shall be included as part of the name, as follows:

(a) “Panela and/or common or vernacular name as known in each country (non – centrifuged sugar)” (common name of the product, e.g. “Panela (non – centrifuged sugar) in mold”).

(b) “Panela and/or common or vernacular name as known in each country (non – centrifuged sugar)” (common name of the product, e.g. “Panela (non – centrifuged sugar) granulated”).

#### 9. METHODS OF ANALYSIS AND SAMPLING

Provision	Method	Principle
Moisture	AOAC 925.45 A. Vacuum Drying	Gravimetry
Ash	AOAC 900.02 A. Method 1	Gravimetry
Total sugars (saccharose)	AOAC 923.09 Modified	Volumetry (redox)
Reducing sugars (glucose)	AOAC 935.62 Modified	Volumetry (redox)
Protein	AOAC 920.176 Modified	Raw Protein (N x 6.25)

**COMMENTS SUBMITTED IN REPLY TO CL 2018/80-CS**

Comments from Brazil, Costa Rica, Cuba, Ecuador, Kenya, Japan, Thailand, Uganda and the United States of America

**Brazil**

Brazil would like to reassess previous concerns taking into account the risk associated with the proposed draft standard and its impact on the Brazilian trade of “açúcar mascavo”, a non-centrifugal sugar that isn't related to Panela and cannot be inserted into the “Common or vernacular names” list as settled out before.

**General comments**

We do not support the current version as it omits the FAO's definition of the product as being a “non-centrifuged sugar” to Panela and its corresponding products referred as “Common or vernacular names”, such as Chancaca (Chile, Ecuador and Peru); Gur o Jaggery (India); Jaggery and Khandsari (South Asia); Kokutou and kurozatou (Japan); Mascabado (Philippines); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and some countries in Central America); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Tapa de Dulce; Dulce Granulado (Costa Rica).

At this point in time we would like to reassess our justification to this comment and to renovate our apprehension as what we have mentioned before remains without consideration - Comments for CL 2017/45-CS, CL 2016/45-CS, CL 2015/19-CS, CL 2015/16-CS.

Since the very beginning of the discussions (Brazil responses to CL 2013/9-CS and CL 2014/35-CS) we were in favor of a broad text inclusive of the various non-centrifugated sugars traded. Nonetheless, whilst acknowledging the developments in place, we still envision that current version of the proposed Standard privileges artisanal products only.

Brazil considers that the approach adopted to not consider Panela and its corresponding equivalent sugars referred as “Common or vernacular names” under the definition of non-centrifugal sugars may jeopardize trade of all other non-centrifugal sugars. Even so we would like to alert that those others non-centrifugal sugars have relevant trade internationally.

In that consideration, we would like to recommend the amendments as proposed below, making a clear correlation that may allow further development of a Standard for other non-centrifugal sugars in line with the *Codex Alimentarius* Strategic Plan and the framework already followed at Codex Stan. 212-199 (CODEX STANDARD FOR SUGARS).

**Specific comments****1. PRODUCT DEFINITION**

“Panela (common or vernacular name)” is a non-centrifugal sugar ~~the product~~ in any shape and presentation, solid/~~molded and mould of any form~~ and/or granulated, obtained from the evaporation of sugar cane juice of the genus Saccharum ~~Saccharum~~ spp., without undergoing centrifugation and purification, maintaining its constituent elements, such as saccharose, glucose, fructose, phenols, flavonoids, minerals and vitamins. In no case is this product totally or partially elaborated from already processed sugars or syrups.

**3.1.1 Basic Ingredients**

**Dried** Sugar cane juice of the genus *Saccharum* spp.

**7.1 NAME OF THE PRODUCT**

7.1.1 The product name “panela” ~~is followed by~~ and/or the ordinary or vernacular name accepted in the country of origin or retail sale.

**3.2 QUALITY FACTORS**

3.2.4 Physical and chemical characteristics.

“Panela (common or vernacular name)” shall fulfill the conditions shown in the following table as appropriate.

Requirement	COMPOSITION ON A DRY BASIS	
	Value	
	Minimum	Maximum
Ash (% m/m)	0.9	--

Saccharose (% m/m)	--	91
Reducing sugars (% m/m)	5.3	--
Proteins in % (N X 6.25)	<del>0.2</del> <b>0.1</b>	--

#### Proteins

The minimum value for proteins should be 0.1% to allow the use of Brazilian sugar cane varieties with very low protein content. Such varieties lead to products with reduced protein content due to further removal of proteins along the processing steps of rapadura (e.g., scum removal).

#### Costa Rica

Costa Rica agradece a Colombia el valioso esfuerzo en la redacción de esta norma y la oportunidad de enviar comentarios.

- Costa Rica apoya el nombre propuesto, con la respectiva nota al pie, de manera que brinde claridad respecto a los nombres comunes con lo cual se puede denominar el producto en los diferentes países que lo producen.
- Respecto al apartado 3.2.4 Características física y química, a Costa Rica le preocupa la propuesta de establecer un valor mínimo de azúcares reductores de 5,3.

**Justificación:** la panela es un producto que presenta grandes variabilidades en sus contenidos y componentes, razón por la cual, establecer un valor mínimo tan elevado, sin que se tome en consideración una banda de valores (mínimo y máximo) que flexibilicen el contenido de azúcares reductores el cual varía de acuerdo al clima, variedad de caña, suelo, madurez de la caña y un sin fin de factores externos e incontrolables, se considera adecuado.

En Costa Rica, respaldado por análisis de rutina promedio mensuales de la industria se ha demostrado que los valores de contenidos de azúcares reductores en la panela, oscilan en un rango entre 2% y el 4%. Esta información ha sido validada por el laboratorio externo "Liga Agrícola Industrial de la Caña de Azúcar" (LAICA), dicho laboratorio se encuentra debidamente acreditado y especializado en el análisis de azúcares. En ese sentido, en una misma muestra de panela que fue analizada en duplicado y con repeticiones, los resultados obtenidos por ambos laboratorios arrojan datos muy similares con una diferencia de 0,4% (2.68% - 3.12%) entre uno y otro. Esta diferencia de 0.4% obedece a diferencias metodológicas de análisis, reactivos utilizados y otros factores, pero que están en un rango aceptable en el margen de error. En el anexo IR-AC-OE-18-424.xls se muestran los resultados del laboratorio de LAICA y en el documento Excel: Análisis de Reductores, se muestra los resultados de control de la industria.

Por lo antes expuesto, debidamente documentado y con el fin de solventar futuros problemas en el cumplimiento del valor propuesto en el proyecto de norma, Costa Rica propone fijar un rango de 2,5% (mínimo) y 5,3% (máximo).

#### Cuba

Por este medio les estamos enviando los comentarios sobre la carta circular CL 2018/74-CS de solicitud de observaciones en el trámite 6 sobre el Proyecto de Norma para el jugo de caña de azúcar deshidratado no centrifugado, donde Cuba en principio apoya las notas explicativas del documento circulado, así como el proyecto de Panela presentado, saludos, cordiales, Jorge Felix Secretario Codex Cuba.

#### Ecuador

- Observación N°- 01**

### 3.2 FACTORES DE CALIDAD

#### 3.2.2 Sabor y aroma

El sabor y el aroma deberán ser los característicos del producto y el producto deberá estar libre de características sensoriales desagradables.

**Ecuador:** Sugiere que solo se coloque **El sabor y el aroma deberán ser los característicos del producto,** ~~y el producto deberá estar libre de características sensoriales desagradables.~~

**Sustento:** Se elimina debido a que el texto es ambiguo y subjetivo.

- Observación N°- 02**

### PROYECTO DE NORMA DEL CODEX PARA LA PANELA (nombre corriente o vernáculo 2)

Nombres comunes o vernáculos utilizados para la panela en otros países y regiones: Chancaca (Chile, Ecuador y Perú); Gur o Jaggery (India); Jaggery y Khandsari (Asia meridional); Kokutou y kurozatou (Japón); Mascabado (Filipinas); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panamá y otros); Papelón (Venezuela y algunos países de América Central); Piloncillo (México); Rapadura (Brasil y Cuba); Tapa de Dulce; Dulce Granulado (Costa Rica).

**Ecuador:** solicita ser incluido en el grupo de países que utilizan el término "Panela" como nombre común.

**Sustento:** En Ecuador no se utiliza el término Chancaca.

- **Observación N°- 03**

#### 1.2.4 Características físicas y químicas.

Nota: La humedad es un factor diferenciador entre las formas de presentación en bloque y granulada del producto.

**Ecuador:** Nota: La humedad es un factor diferenciador entre las formas de presentación y **la composición final de los sólidos**, en el producto **(bloque y granulada)**.

**Sustento:** El factor humedad influye en la composición final de los sólidos.

### Japan

#### General Comments

Japan would like to reiterate that ensuring transparency is most important for the chair of a committee working by correspondence to reach consensus as well, in the same manner as a physical meeting where all questions raised are supposed to be discussed in accordance with Procedural Manual. So far, Japan has contributed to CCS by providing comments for the draft standard of 'Non-Centrifugated Dehydrated Sugar Cane Juice' multiple times, including necessity for clarifying its scope and ensuring comprehensiveness regarding physical and chemical characteristics as well as positioning it as a regional standard. However, it is regrettable that we have not received any clear responses so far. Japan believes working on draft standard in a transparent manner is essential, and thus Japan would recommend to seek a possibility to hold a physical meeting as noted at CAC41 for ensuring transparent discussions.

#### Specific Comments

➤ As the scope of the standard is narrowed to specific product 'Panela', Japan would suggest that other products such as Japanese 'Kokutou' and 'Kurozatou' should be removed from the scope, or otherwise the draft standard should be developed as a regional standard rather than an international standard, because the proposed physical and chemical characteristics are overly specific to an indigenous product 'Panela', which does not necessarily match with 'Kokutou' and 'Kurozatou'.

➤ If the draft standard 'Panela' is intended to be developed as an international standard nonetheless, Japan would strongly request to lower requirement for minimum level of reducing sugar to 1.5 (%), considering typical reducing sugar content of 'Kokutou' and 'Kurozatou' and the fact that the basis of proposed reducing sugar requirement is derived from several measurements of 'Panela' as mentioned in CL 2018/74-CS, which undoubtedly does not represent other similar products.

### Kenya

#### General comments:

Kenya appreciate working together with Colombia for the last six years. Kenya import and produces this product for direct consumption and for further processing.

We thank Colombia accepting to continue being the chair of this EWG in the last CAC41 meeting held in Rome in July 2018, which we also attend and support the continuation of this work for one year so that it can be finalized.

Kenya sent its comments last time but we have noted that our name does not appear in the document circulated to EWG for comments, however, we would like to submit our comprehensive comments to Colombia for consideration at this step 6 while hoping that this document will be advanced to the next step in CAC42 that will be held in Geneva next year 2019 July.

Title: We have no objection with the title of the product to be "panela" however we would propose that footnote be inserted at the bottom of the page to indicate "Panela also means Jaggery". We call it Jaggery in Kenya.

**Name of the product**

7. This section is totally amended. The title of the Draft Standard changed to “Draft Standard for Panela (common or vernacular name known in each country)”.

**COMMENT**

We have no objection with the "name of the product" since it reflects the title name however, the concern of other countries that call it Jaggery should be addressed at the footnote.

**Section 1. Scope****COMMENT**

We propose the footnote <sup>2</sup> to include jaggery ( Kenya)

2 Common or vernacular names used in other countries and Regions for panela: Chancaca (Chile, Ecuador and Peru); Gur o Jaggery (India); Jaggery (**Kenya**) and Khandsari (South Asia); Kokutou and kurozatou (Japan); Mascabado (Philippines); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and some countries in Central America); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Tapa de Dulce; Dulce Granulado (Costa Rica).

Scope” to illustrate that the product does not correspond in any case to the one elaborated from the reprocessing of the components of sugar cane or by-products thereof, as is the case with sugar, molasses, syrups, among others, to prevent irregular practices, guaranteeing that the product marketed is natural, and the direct result of milling of sugar cane and not mislead the consumer by offering a product that proceeds in its elaboration from others already processed.

**Section 2. Product Definition**

“Panela (common or vernacular name)” is the product in any shape and presentation, solid or mould of any form and/or granulated, obtained from the evaporation of sugar cane juice of the genus *Saccharum spp.*, without undergoing centrifugation and purification, maintaining its constituent elements, such as saccharose, glucose, fructose, phenols, flavonoids, minerals and vitamins. In no case is this product totally or partially elaborated from already processed sugars or syrups.

**COMMENT on Section 2: Product definition**

**We have no objection on the definition.**

**Section 3.1.1. Basic ingredients****COMMENT:**

Although these sections were not requested for comments we propose Sections 3.1.1-3.2,2 remain the same in the standard. We would like to confirm our current position as follows:

**3.2.2 Flavour and aroma**

Comment -

**we noted that** these provision were not the subject of this request for comments, nor have they changed as a consequence of the revision of other sections since last year so we propose they remain the same No objection, we accept it as is

**3.2.3 Defects**

Comment

**we noted that** these provision were not the subject of this request for comments, nor have they changed as a consequence of the revision of other sections since last year so we propose they remain the same No objection, we accept it as is

**Section 3.2.4 Physical and chemical characteristics**

**Ash (% m/m):** The minimum value of 0.9 is maintained, without setting a maximum value. A point of note is that the purpose of including ash with a minimum value is with the purpose of preserve the content of minerals during processing, as they are elements that add a differentiating nutritional factor to the food, minerals that are normally lost using a different processing method. The maximum value for ash is not included because of the high variability of the soils where sugar cane is grown and the different fertilization programmes that some regions may implement.

**COMMENT:**

**We propose to change "Ash" to "Total Ash" to specify that this the Total Ash for clarity and give the Max Of 4.0%/m to bring this standard in harmony with our East Africa regional standard based on our products statistics.**

**Total sugars (saccharose) (% m/m):** The maximum value is adjusted to 91 (% m/m), without establishing a minimum value. In their comments received, only one delegation suggests in the composition table, a minimum value of 70%, which hinders the balance of the components of the product, and thus, implies a high value in reducing sugars, higher than 20%, a fact that would complicate the presentation of the product and its shelf life.

**COMMENT:**

There is need to set the minimum level but not the Maximum of Saccharose to indicate the amount of sugar in the jiggery. We propose the minimum limit to be 60%

**Total sugars (reducing sugars) (% m/m):** The Codex Committee on Sugars sets a minimum value of 5.3 (%m/m), without establishing a maximum value.

**For reducing sugar:** we propose 18%/m Max as per our regional standard. We have never faced any challenges trading the product within the region

**COMMENT:**

For Total Sugar( reducing sugar) We propose a minimum of 78.0 % m/m Minimum-

**Proteins % (N x 6.25):** The minimum value of 0.2 (N x 6.25) proposed in the draft standard in previous occasions is maintained taking into account one comment from a member of the Codex Alimentarius

**COMMENT:**

**We have no objection in using protein factor of N.x6,25 so we expect no change in this clause.**

**Section 4 to 6 Food Additives, Contaminants and Hygiene respectively**

**COMMENTS**

**we noted that** these provision were not the subject of this request for comments, nor have they changed as a consequence of the revision of other sections since last year so we propose they remain the same for there are existing Codex standards that can be referred to .

**4.0 FOOD ADDITIVES:**

4.1 No additives are permitted for use in the products covered by this Standard.

COMMENT: we have no objection on this clause

**5. CONTAMINANTS**

*We propose that contaminants safety levels shall comply with General Standard for Contaminants and Toxins in Foods and Feeds (CXS 193-1995).*

**6. HYGIENE**

**We propose that the production ,processing, packaging , distribution and marketing to comply with General Principles of Food Hygiene (CXP 1-1969) and other relevant Codex texts such as codes of hygienic practice and codes of practice.**

The product should comply with any microbiological criteria established in accordance with the *Principles and Guidelines for the Establishment and Application of Microbiological Criteria related to Foods (CXG 21 – 1997)*.

**Section 7. Labelling**

25. This section has been partially amended. The name “non – centrifuged dehydrated sugar cane juice” is changed to “panela (common or vernacular known in each country)”. However, due to the possible weight differences for the solid style of the product owing to its hygroscopic properties, this section could be reviewed.

26. It is reiterated that this provision should be considered by the Codex Committee on Food Labelling.

**7.1 NAME OF THE PRODUCT**

7.1.1 The product name “panela” is followed by the ordinary or vernacular name accepted in the country of origin or retail sale.

7.1.2 The style of presentation shall be included as part of the name, as follows:

(a) **Panela** (common or vernacular name) (common name of the product, e.g. “Solid Panela”).

(b) **Panela** (common or vernacular name) (common name of the product, e.g. “Granulated Panela”)

### **COMMENT**

**We support the consideration of this section by CCFL with our request of amending the footnote of “Jaggery (Kenya)” which is another vernacular of panela .**

### **Section 8. Methods of analysis and sampling**

27. This section has been partially amended. Total sugars are separated into reducing sugars and non-reducing sugars associating them separate methods of analysis and sampling. For this provision, CCS considers the AOAC methods due to its international recognition and worldwide application. The Codex Committee on Sugars does not consider appropriate to use the methods of the International Commission for Uniform Methods of Sugar Analysis (ICUMSA) because of the technical differences of the product to standardize against sugar.

28. It is reiterated that the Codex Committee on Methods of Analysis and Sampling should validate this provision.

For checking the compliance with this standard, the methods of analysis and sampling contained in the *Recommended Methods of Analysis and Sampling* (CXS 234-1999) relevant to the provisions in this standard, shall be used-

<b>Provision</b>	<b>Method</b>	<b>Principle</b>
Moisture	AOAC 925.45 A. Vacuum Drying	Gravimetry
Ash	AOAC 900.02 A. Method 1	Gravimetry
Total sugars (saccharose)	AOAC 923.09 Modified	Volumetry (redox)
Reducing sugars (glucose)	AOAC 935.62 Modified	Volumetry (redox)
Protein	AOAC 920.176 Modified	Raw Protein (N x 6.25)

### **COMMENT**

**we noted that** Methods of Analysis provision was not the subject of this request for comments, nor have they changed as a consequence of the revision of other sections since last year so we propose they remain the same

### Thailand

#### **Specific comments:**

#### 3.2.3 Defects

The product shall be free from defects such as ~~presence of foreign matters, damage caused by fungus, presence of insects and/or its fragments or softening.~~ **Damage caused by microorganisms (e.g. fungus), presence of foreign matters, insects and/or its fragments or softening.**

#### **Rationale:**

We would like to amend “the fungus” to “microorganisms” due to the fact that the damage should cover that caused by all microorganisms in general. We also arranged and grouped the caused of defects as follow microorganisms and physical defects, respectively.

### Uganda

Uganda Acknowledges the ongoing work in Codex and thanks the Secretariat - Codex Committee on Sugars (CCS) for the great work. Uganda is in agreement with the Draft Codex Standard for Panela. However, we submit comments for consideration on the title and section 3.2.4 as shown in the table below;

COMMENTS ON DRAFT CODEX STANDARD FOR PANELA (Common or vernacular name2) (Draft Standard for Non-centrifuged Dehydrated Sugar Cane) at Step 6

<b>Clause No./</b>	<b>Paragraph/ Figure/Table/Note</b>	<b>Type of comment</b>	<b>Comment (justification for change)</b>	<b>Proposed change</b>
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Subclause No./ Annex (e.g. 3.1)	(e.g. Table 1)			
Title		Technical	Need to Consider common name /vernacular as 'Jaggery' Justification: For the similar product, The common name Jaggery is already used in one of the regional Standard (US EAS 818:2015, Sugar cane jaggery — Specification) thus this name will easily be understood in Uganda.	The new title will read as; CL 2018/74-CS, DRAFT CODEX STANDARD FOR PANELA (jaggery)
3.2.4	Table	Technical	Set the minimum level as 60 (% m/m) and maintain the maximum at 91 (% m/m) for Saccharose. Justification: Reference to a similar existing regional standard (US EAS 818:2015, Sugar cane jaggery — Specification)	Maximum Saccharose level to be set at 91 (% m/m)

### The United States of America

#### GENERAL COMMENTS

The United States would like to compliment Colombia in its efforts to present a new proposed product name in an attempt to promote consensus to advance the draft standard. However, we still have a number of concerns regarding the draft standard and disagree with reverting back to the original product name: "Panela (Common or vernacular name known in each country)."

#### SPECIFIC COMMENTS

##### Name of the Product

The United States does not agree with the proposal to revert the product name back to "Panela (Common or vernacular name known in each country)." In the *Codex General Standard for the Labelling of Prepackaged Foods* ([Codex STAN 1-1985](#)), Section 4.1: The name of the food states that:

- 4.1.1 The name shall indicate the true nature of the food and normally be specific and not generic:
- 4.1.1.3 In the absence of any such name, either a common or usual name existing by common usage as an appropriate descriptive term which was not misleading or confusing to the consumer shall be used.

The United States believes the name "Panela (Common or vernacular name known in each country)" neither indicates the true nature of the food, nor is it specific. If the name "panela" gets adopted, it may mislead consumers because it does not reveal that the product itself is a type of sugar. In addition, the use of a variety of terms by region or on a national basis in parenthesis could be confusing to the consumer.

[FAO](#) already has a definition for "non-centrifugal sugar;" we believe that "non-centrifugal cane sugar" is a direct term to describe this type of product. We provided this comment in response to CL2017/45-CS, however our proposal to adopt the FAO term "non-centrifugal" was not addressed. The United States would like to understand the rationale for not using the FAO terminology, as recommended by several member countries in their comments on several previous CLs. The United States strongly believes that it is more appropriate to name the product "Non-Centrifugal Raw Cane Sugar" than "Non-Centrifuged Dehydrated Sugar Cane Juice."

#### 3.2 Quality Factors

Based on the proposed **3.2.4 Physical and chemical characteristics** of the draft standard, a minimum of 0.9 % ash and 0.2% protein are required for the product. This could lead up to maximum of 98.9% sugar (saccharose and reducing sugars combined) in the product on a dry basis:

- A "solid" style panela with maximum 9% of water would result in a product with almost 90% sugar.
- A "granulated" style panela with maximum 5% of water would result in a product with almost 94% of sugar.

As we have previously suggested, the United States believes that the current *Codex Standard for Sugars* only covers centrifugal sugars; that is why “panela” does not fit in the current sugar standard. CCS may want to consider the following:

- renaming the current sugar standard to *Codex Standard for Centrifugal Sugars*, and start to work on a *Codex Standard for Non-Centrifugal Sugars* if deemed necessary;
- classifying the sugars listed under the current standard as Centrifugal Sugar and add another section for Non-Centrifugal Sugar; or
- Adding “sugar”, a common or usual name for this type of the product to any proposed names to avoid misleading or confusing consumers.

While CCS could focus on the above options, it is not clear whether there are any trade impediments due to lack of the standard. In the Explanatory Notes (paragraph 8) of CL 2018/80-CS, it states that there has been an average increase of panela exports corresponding to 59%, from 2012 (with 720 tonnes) to 2017 (with 4387 tonnes). As a result, we are not convinced that the standard is truly necessary.