

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

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ORIGINAL LANGUAGE

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

28th Session

Washington DC, United States of America,

12 – 16 September 2016

Comments on

PROPOSED DRAFT ANNEXES ON QUICK FROZEN VEGETABLES (for inclusion in the Standard for Quick Frozen Vegetables

CODEX STAN 320-2015)

COMMENTS SUBMITTED BY:

EUROPEAN UNION, NIGERIA, REPUBLIC OF KOREA

EUROPEAN UNION

The European Union and its Member States (EUMS) would like to thank the USA and France for leading the eWG and for the report prepared for this session of the Committee.

The EUMS would like to submit the following comments:

Unresolved issues in all annexes

Issue 1: Reference to "other styles": A general provision in Codex STAN 320-2015 (section 2.4.) seems sufficient. This provision allowing for the possibility to have other styles, as long as these fulfil certain conditions, including that they are adequately described on the label to avoid confusing or misleading the consumer, applies to all the products covered by the different annexes. *(As proposed by France)*

Issue 2: Defects and allowances: The Committee should consider possibility to have different means of calculating defects including both a scoring method by count and by percentage depending on the commodity. This would allow more flexibility given the wide variety of commodities under consideration and their differences in size/mass and presentation.

Issue 3: Appendix III – Food Additives in all annexes: Generally, the EUMS support listing of individual food additives applying to each individual Quick Frozen Vegetables. The lists can better reflect the technological need of individual Quick Frozen Vegetables since the corresponding GSFA food category is much broader and it includes all standardised and non-standardised products. It is important to note that retaining the lists of additives does not contradict the ultimate goal, which is supported by the EUMS, of making the GSFA the single authoritative reference point for food additives. The Codex Committee on Food Additives developed a decision tree on the alignment between the commodity standards and the GSFA which reflects the specific food additive provisions for standardised products in the GSFA and acknowledges that commodity standards have legitimate reasons for the limited food additive permissions. When the alignment process is completed (i.e. the GSFA takes into account the food additive provisions of the commodity standards) the reference to the GSFA can be included in the commodity standards.

As regards the standards / Annexes under consideration it is important to note that no one (apart from Annex IV French fried potatoes) permits the use of food additives. Therefore, the discussion whether the reference to the GSFA or listing of individual food additives is more appropriate is in the view of the EUMS irrelevant for Annexes not permitting any additives.

It should be noted that the Annexes refer to products that have been standardised since 1981 and for which no technological need has been identified until now. This information should be more than sufficient to justify why there is no need for food additives. Therefore, the reference to the GSFA is not possible since there is no functional class or a food additive to be referred to the GSFA.

Listing of processing aids in all annexes

As regards processing aids the EUMS would like to draw the attention to para. 47 of REP15/PFV which clarifies that processing aids would not be listed, instead, a general reference to *Guidelines on Substances used as Processing Aids (CAC/GL 75-2010)* would be used so that for those products to be covered in further annexes

that may require processing aids, the general provisions would apply. The EUMS takes note that CX/PFV 16/28/4 includes provisions for specific processing aids, therefore, the EUMS is seeking a clarification as regards the suggested provisions in light of the agreement on processing aids reached at the last CCPFV session.

References to the Guidelines for the use of Flavourings (CAC/GL 66-2008)

The EUMS take note that APPENDIX I introduces the references to the *Guidelines for the use of Flavourings (CAC/GL 66-2008)* for the revised annexes for Broccoli, Brussels sprouts, Cauliflower, Green beans & wax beans and Spinach. Taking into account that the currently applicable standards of the aforementioned commodities do not contain any reference to the use of flavourings the EUMS would like to ask for the rationale and justification of the proposed amendment (i.e. for justification for the use of flavourings in quick frozen vegetables).

Unresolved issues in specific annexes

Annex IV – Quick Frozen French Fried Potatoes:

Section 1.1 Product Definition: The EUMS understand that the products covered by this annex are only fried and pre-cooked products. In this case it would be useful to clarify that products that have not been fried or pre-cooked are not covered by this annex.

Section 1.2.1.1 Nature of the surface: The EUMS are of the opinion that spirals and wedges should not be listed as separate new indents, but should fall under the designation "Other styles". Not only the trade in these spiral and wedged-shape quick frozen French fries is rather limited compared to the straight cut and crinkle cut varieties, but including them under the designation "Other styles" would avoid having to define "spirals", "wedges" or any other shape in this annex.

Section 2.1.2 Optional ingredients / Section 5 Labelling: The EUMS are of the opinion that it should be clearly specified that if batter is added, this has to be mentioned in the name of the product or in its close proximity. Paragraph 5.1.3 should therefore be amended as follows:

"If the product is produced in accordance with Sections 1.2.1.1 **and 2.1.2 (d)** 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."

The other optional ingredients listed clearly fall under the provision of Section 9.2.3 of STAN 320-2015.

Section 3. Food Additives: The EUMS favour keeping the list of individual food additives for the reasons explained above. Concerning phosphates, the EUMS are of the view that the whole group of phosphates shall be permitted and the use level revised (increased). The current maximum level (100 mg/kg expressed as P₂O₅) is not sufficient to achieve the desired effect (i.e. preventing potatoes from darkening caused by an oxidation reaction of iron and phenolic compounds – phosphates act as sequestrants capturing iron) and refers rather to the amount of phosphates present at the point of consumption than to the amount needed (added) during processing. Based on the industry practices a washing solution of 2000-5000 mg/l (expressed as P₂O₅) achieves the desired effect, therefore, the EUMS recommend to revise the maximum use level to 5000 mg/ kg expressed as P₂O₅ (corresponding to approx. 2200 mg/kg expressed as P).

As regards other proposed functional classes (i.e. colours, emulsifiers, gelling agents, stabilisers, thickeners and sweeteners) the EUMS question the technological need for them especially for the use of colours and sweeteners. The EUMS expect full technological justification for each of the proposed additional food additive uses.

As regards processing aids the EUMS would like to note that the use of sulfites and polydimethylsiloxane is recognised in the corresponding GSFA food category (04.2.2.1) as a food additive use with the same maximum levels as currently listed (as processing aids) in CS 114-1981. Therefore, the Committee should carefully consider whether the use of the mentioned substances is a processing aid or a food additive use when discussing section 3 of the standard.

The EUMS agree with the use of asparaginase as a processing aid to reduce acrylamide formation in the final product.

NIGERIA**AGENDA ITEM 4 CX/PFV 16/28/4:*****Proposed Draft Annexes on Quick Frozen Vegetables (For inclusion in the Standard for Quick Frozen Vegetables (CODEX STAN 320-2015) (STEP 4) and Methods of Analysis for Quick Frozen Vegetables (For inclusion in Section 11 – Methods of Analysis and Sampling of CODEX STAN 320-2015)***

Nigeria commends the eWG chaired by United States of America and co-chaired by France for redrafting the remaining annexes on Quick Frozen Vegetable including Methods of Analysis, and submits the comments below:

Annex I: Broccoli

1. Nigeria does not support the inclusion of subsection **1.2.1 (e) [Other Styles- as defined in Section 2.4 Styles of the general provisions]** in the annex since it was already mentioned in the General Quick Frozen Vegetable Standard, to avoid repetition.

Annex III: Cauliflower

1. Nigeria does not support the inclusion of subsection **1.2.1 (d) [Other Styles- as defined in Section 2.4 Styles of the general provisions]** in the annex since it was already mentioned in the General Quick Frozen Vegetable Standard, to avoid repetition.
2. On **2.2.4 Defects and Allowances**: Nigeria supports the Table proposed by France as expression of defects in percentage and kilogram is more objective method of assessment than visual scoring that is subjective.

Annex IV: French Fried Potatoes

1. Nigeria does not support the inclusion of subsection **1.2.1.1 (e) [Other Styles- as defined in Section 2.4 Styles of the general provisions]** in the annex since it was already mentioned in the General Quick Frozen Vegetable Standard, to avoid repetition.
2. On **3.2 Food Additives**: Nigeria does not support the inclusion of *Colouring Agents* in the subsection 3.2 table, unless this can be justified with safe levels and technological functionality.

Annex V: Green Beans & Wax Beans

1. Nigeria does not support the inclusion of subsection **1.2.2 (f) [Other Styles- as defined in Section 2.4 Styles of the general provisions]** in the annex since it was already mentioned in the General Quick Frozen Vegetable Standard, to avoid repetition.
2. On **2.2.4.2 Visual Defects**: Nigeria supports the Table as proposed by France because the expression of defects in percentage (%) and kilogram is a more objective method of assessment than visual scoring which is subjective.

Annex VI: Peas

1. On **1.2.1 Sizing**: Nigeria supports the Table as proposed by France because it allows for better interpretation of the various sizing.

REPUBLIC OF KOREA**2.2.4 Proposals on Defects and Allowances**

Defects and Allowances section of each annex is important because it is related to quality of products. The proposal to change the scoring defects by counting to percentage needs more explanation and justification.

Determination of total soluble solids content of frozen fruits (CAC/RM 43-1971)

The Republic of Korea proposes to consider replacing current International scale(1936) of refractive indices of sucrose solutions with the International refractive index scale of ICUMSA(1974) for pure sucrose solutions because it is latest international criteria and has been adopted by International Organization of Legal Metrology(OIML).