

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4**

**CX/PFV 19/29/4 Add1**  
**Original Languages Only**

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

**29<sup>th</sup> Session, working by correspondence**

### **COMMENTS ON THE PROPOSED DRAFT STANDARD FOR CHILI SAUCE**

(Comments submitted by Iran, Iraq, Malaysia, Saint Kitts and Nevis, Thailand, United States of America and Collagen Casings Trade Association (CCTA))

#### **BACKGROUND**

This document compiles the comments on the proposed draft standard for chili sauce to at Step 3 of the Procedure, submitted through the Codex Online Commenting Systems (OCS). The comments are as shown in the Appendix.

The Online Commenting System (OCS) is an online tool that enables contact points to submit comments on draft texts in a standardised way thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

#### **EXPLANATORY NOTES ON THE APPENDIX**

##### Structure of Comments

The Comments submitted have been presented in a table format, with each Table divided into the following two Columns as follows:

**First Column** – Provides the proposed changes made by contact points on the text, and is divided into general comments and comments specific to a paragraph.

**Second Column** – Provides its author and the rationale (explanation) of the comment. For general comments, only the author of the comment is included.

## COMMENTS ON THE PROPOSED DRAFT STANDARD FOR CHILI SAUCE

General Comments	Members or observers
we agree with proposed draft and we have no comments.	Iraq

  

Specific comments	Members or observers/Rational
<b>Title</b>	
Proposed Draft Codex Standard for <u>Chili-Hot Sauce or Hot Pepper Sauce</u>	<b>Saint Kitts and Nevis</b> Hot sauce or Hot Pepper Sauce is all inclusive of hot capsicum peppers
<b>1. SCOPE</b>	
This standard applies to <u>chili sauce</u> "hot sauce" or "hot pepper sauce", as defined in Section 2 below, and offered for direct consumption, including for catering purposes or for repacking if required. It does not apply to the product when indicated as being intended for further processing.	<b>Saint Kitts and Nevis</b> Chili pepper is a type of hot pepper. Scotch bonnet is also another type of hot pepper. Therefore, if a hot pepper sauce is made from scotch bonnet, is it still supposed to be called chili sauce? Recommend changing chili sauce to hot pepper sauce or hot sauce
<b>2.1 Product definition</b>	
<u>Chili-Hot sauce or Hot pepper</u> is the product:	<b>Saint Kitts and Nevis</b> Hot sauce or Hot Pepper sauce is all inclusive of sauces made with any type of hot peppers
prepared from the edible portion of sound, <del>and</del> clean <u>and fresh chili (Capsicum spp.) or</u> <u>and/or processed chili and</u> raw materials referred to in Section 3.1 below which are mixed and prepared to obtain the desired quality and characteristics;	<b>Malaysia</b> Malaysia proposes it should be change to "and/or". There are products produced using combination of fresh and processed chilli.
prepared from the edible portion of sound, <del>and</del> clean <u>and fresh chili-hot peppers (Capsicum spp.) or processed chili-hot peppers and</u> raw materials referred to in Section 3.1 below which are mixed and prepared to obtain the desired quality and characteristics;	<b>Saint Kitts and Nevis</b> Hot peppers is all inclusive of the Capsicum spp.
<del>intended for use as seasoning and condiment;</del>	<b>Malaysia</b> Malaysia notes it is repeated as "(a)" and should be deleted.
intended for use as seasoning and condiment;	<b>USA</b> delete C because it is already stated in (a)
processed by heat, <u>or by other physical means</u> , in an appropriate manner, before or after being hermetically sealed in a container, so as to prevent spoilage.	<b>USA</b> added physical means. Chile sauce may be pickled or seasoned by spices
<b>2.2 Styles</b>	
<b>2.2 Styles</b>	<b>Saint Kitts and Nevis</b> Pepper sauce with oil infusions is a commodity used and traded within St. Kitts and

	Nevis as well as other Caribbean countries. Would like to ensure that this is also captured and not ruled out.
<b>2.2.1 Chili sauce can be of the following styles:</b>	<b>Thailand</b> We have no objection to delete the term " Chili Sauce" but the rest of subsections (a) - (d) should be retained.
<b>2.2.1 Chili sauce can be of the following styles:</b>	<b>Malaysia</b> Malaysia is of the view Section 2.2.1 and 2.2.2 could be rearrange as other styles has been removed.
<b>2.2.1 <u>Chili-Hot</u> sauce <u>or Hot pepper sauce</u> can be of the following styles:</b>	<b>Saint Kitts and Nevis</b> Chili pepper is a type of hot pepper. Scotch bonnet is also another type of hot pepper. Therefore, if a hot pepper sauce is made from scotch bonnet, is it still supposed to be called chili sauce? Recommend changing chili sauce to hot pepper sauce or hot sauce
<del>Chili sauce</del> with pulp and seeds homogeneously ground together.	<b>Thailand</b> We have no objection to delete the term "chilli sauce"
<del>Chili sauce with pulp and seeds homogeneously ground together with the addition of particles of chili pulp, flakes and pieces and seeds distributed in the sauce.</del>	<b>Thailand</b> We have no objection to delete the term "chilli sauce" but the rest of subsections (b) should be retained.
<del>Chili sauce with crushed pulp and seeds as separate layers or distributed in the sauce.</del>	<b>Thailand</b> We have no objection to delete the term "chilli sauce" but the rest of subsections (c) should be retained.
<del>Chili sauce with only pulp or crushed pulp or both.</del>	<b>Thailand</b> We have no objection to delete the term "chilli sauce" but the rest of subsections (d) should be retained.
<b>3.1.1 Basic Ingredients</b>	
fresh chili ( <i>Capsicum spp.</i> ) <del>or</del> <u>and/or</u> processed chili such as chili powder ground from dried chili, roasted chili, ground chili , chili preserved in vinegar or in brine <u>or frozen</u> ;	<b>Malaysia</b> Malaysia propose to change to "and/or" as per proposed in definition.
<b><u>fresh chili/peppers (<i>Capsicum spp.</i>) whole or pieces or pepper mash</u></b>	<b>Malaysia</b> This sentence can be combine in "a" above and (b) can be removed.
<del>edible salt</del> Salt as defined in the Standard for Food Grade Salt (CXS 150-1985);	<b>Thailand</b> Need to reference Codex standard for salt in subsection (d) as follows: "(d) Salt as defined in the Standard for Food Grade Salt (CXS 150 – 1985);"
<b><u>edible</u></b> salt;	<b>Malaysia</b> Malaysia is of the view the word "edible" is not necessary as salt in Codex Standard understood referring to edible salt..
<b><u>edible</u></b> salt;	<b>Saint Kitts and Nevis</b> Salt is too ambiguous. Also would like to ensure that the reader understands that it is Sodium Chloride

<u>Potable</u> water.	<b>Saint Kitts and Nevis</b> Water is also too ambiguous. Want the reader to understand that it is water fit for consumption. Recommend "Potable" water
<b>3.1.2 <u>Optional Other Permitted Ingredients</u></b>	<b>Thailand</b> To be consistent with the other Codex standards for processed fruits and vegetables, the title of this Section and subsection (c ) and (d) should be amended as follows: "3.1.2 Other Permitted Optional Ingredients (c) spices and culinary herbs and/or their extracts <sup>2</sup> ; (d) sugars and/or others foodstuffs with sweetening properties such as honey as defined in the Standards for Sugars (CXS 212-1999) and Honey (CXS 12-1981), respectively; 2 In accordance with the relevant Codex standards for spices and culinary herbs when available."
<b>Fresh or process, whole, pieces or pulp of fruits such as</b> mango, papaya, tamarind and/or others <u>fruits</u> ;	<b>Malaysia</b> Malaysia is of the view there is no need to qualify the form of fruits and vegetables.
<b>Fresh or <del>process</del>processed, whole, pieces or pulp of fruits such as</b> mango, papaya, tamarind and/or others <u>fruits</u> ;	<b>CCTA</b>
<b>Fresh or <del>process</del>processed, whole, pieces or pulp of vegetables such as</b> tomato, garlic, onion, carrot, sweet potato, yellow pumpkin and/or others <u>vegetables</u> ;	<b>CCTA</b>
<b>Fresh or process, whole, pieces or pulp of vegetables such as</b> tomato, garlic, onion, carrot, sweet potato, <u>yellow</u> pumpkin and/or others <u>vegetables</u> ;	<b>Saint Kitts and Nevis</b> "yellow" pumpkin is trade prohibitive. A pumpkin is a pumpkin regardless of its colour. Recommend removing the word yellow.
spices and <del>herbs</del> <u>culinary herbs and/or their extracts</u> <sup>2</sup> ; <u><sup>2</sup> In accordance with the relevant Codex standards for spices and culinary herbs when available.</u>	<b>Thailand</b> see comment in Section 3.1.2
spices and <u>culinary</u> herbs;	<b>USA</b>
sugars <b>and/or other foodstuffs with sweetening properties such as honey as defined in the Standards for Sugars (CXS 212-1999) and Honey (CXS 12-1981), respectively;</b>	<b>Thailand</b> See comment in Section 3.1.2
other edible ingredients as appropriate to the product.	<b>Saint Kitts and Nevis</b> If other ingredients are permissible, why have a list?
<b>3.2.1 General Requirements</b>	<b>Iran</b> total soluble solids shall contain a minimum of 15%
<b>3.2.1 General Requirements</b>	<b>Thailand</b> We would like to reiterate our previous comments submitted to EWG that there is no need to further elaboration on TSS, acidity and ash of chili sauce. Rationale: The required characteristics of chili sauces and the combination of different types of acids are depending on consumer preference. Also, there are many levels of spiciness for chili sauce in trade depending on varieties of chili and consumer preference, therefore it is difficult to regulate TSS, acidity values and ash in this product. With regard to provision on ash, so far, we are not aware of international trade requirements for checking ash in the product. In addition, ash analysis could

	also affect the cost of compliance. Thus, we suggest deleting subsection (b) Ash, (c) pH or Acidity%, and (d) Total Soluble Solids (TSS).
<del>Chili sauce should have normal colour, flavour, and odour, corresponding to the type of raw materials used and should possess texture characteristic of the product.</del>	<b>Saint Kitts and Nevis</b> "normal colour" and "flavour" is not measurable. Recommend removing this section.
<del>[Ash The total ash shall not exceed 3.5 % m/m.]</del>	<b>Thailand</b> See comments in Section 3.2.1
<del>[pH pH or acidity]</del>	<b>Malaysia</b> Malaysia suggests this title should be change to " pH or Acidity"
<del>[pH]</del>	<b>Saint Kitts and Nevis</b> Does the pH method take into account oil infusion pepper sauce? If not, we should ensure that it does.
<del>The pH of the product shall not exceed 4.]</del>	<b>Thailand</b> See comment in Section 3.2.1
<del>The pH of the product shall not exceed 4.]</del>	<b>Malaysia</b> Malaysia is of the view chilli sauce shall not limited by pH . Different consumer market required different sour taste profile
<del>Or</del>	<b>Thailand</b>
<del>[Acidity % Not less than 1.0 percent] [Total Soluble Solids Chili Sauce shall contain a minimum of [25%] or [15%] or [8%] total soluble solids]</del>	<b>Thailand</b> See comment in Section 3.2.1
<del>Chili Sauce shall contain a minimum of [25%] or [15%] or [8%] total soluble solids]</del>	<b>Malaysia</b> Malaysia supports 25% as it is in Malaysia Food Regulations.
<b>3.2.2 Definition of Defects</b>	
<del>Foreign-vegetal matter-Extraneous Vegetable Material (EVM) means any vegetable part (such as, but not limited to, chili pedicels, leaves, calyxes and garlic stems) that does not pose any hazard to human health but affects the overall appearance of the final product.</del>	<b>Thailand</b> We are of the view that the term "Foreign vegetal matter" should be replaced with "Extraneous Vegetable Material (EVM)" to be consistent with the term used in other Codex standards for processed fruits and vegetables.
<del>Foreign-Extraneous vegetal matter means any vegetable part (such as, but not limited to, chili pedicels, leaves, calyxes and garlic stems) that does not pose any hazard to human health but affects the overall appearance of the final product.</del>	<b>USA</b>
<b>4. FOOD ADDITIVES</b>	
<b>FOOD ADDITIVES</b>	<b>Thailand</b> Section 4.1 is acceptable. We understand that Table 4.2 to Table 4.9 will be deleted after alignment by CCFA. However, we consider that Section 4.2 to Section 4.9 should not be included as part of the Proposed Draft Standard at step 3 to avoid confusion. It would be more helpful to develop a separated document for comments on Table 4.2 to Table 4.9

<p><b>4.1</b> Acidity regulators, antioxidants, colours, flavour enhancers, preservatives, sweeteners, <b>emulsifier, stabilizer</b> and thickeners <b><u>used in accordance with Tables 1 and 2 of the General Standard of Food Additives in food category 12.6.2 (Non-emulsified sauces e.g. ketchup, cheese sauce, cream sauce, brown gravy) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.</u></b></p>	<p><b>Thailand</b> Section 4.1 is acceptable.</p>
<p><b>4.1</b> Acidity regulators, antioxidants, colours, flavour enhancers, preservatives, sweeteners, <b>emulsifier, stabilizer</b> and thickeners <b><u>used in accordance with Tables 1 and 2 of the General Standard of Food Additives in food category 12.6.2 (Non-emulsified sauces e.g. ketchup, cheese sauce, cream sauce, brown gravy) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.</u></b></p>	<p><b>USA</b> We support referencing the GSFA as it simplifies and adds flexibility to the standard. We recommend deleting tables 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, and 4.9</p>
<p><b>4.2 Acidity regulators</b></p>	<p><b>Thailand</b> See comment in Section 4.</p>
<p><b>4.2 Acidity regulators</b></p>	<p><b>USA</b> Delete 4.2. and instead refer to the GSFA</p>
	<p><b>Thailand</b> See comment in Section 4 Section 4.2; - Food additives in square brackets are not used in chili sauce production in Thailand. - The food additives and their maximum levels in curly brackets have been endorsed by CCFA for used in food category 12.6.2. We consider that there is no need to request CCFA for inclusion of notes to GSFA for allowance of specific levels of those food additives.</p>
<p><b>4.3 Antioxidants</b></p>	<p><b>Thailand</b> See comment in Section 4.</p>
<p><b>4.3 Antioxidants</b></p>	<p><b>USA</b> Delete table and instead refer to the GSFA</p>
<p>The table on Antioxidant</p>	<p><b>Thailand</b> See comment in Section 4 Section 4.3, the food additives and their maximum levels in curly brackets have been endorsed by CCFA for used in food category 12.6.2. We consider that there is no need to request CCFA for inclusion of notes to GSFA for allowance of specific levels of those food additives.</p>
<p><b>4.4 Colours</b></p>	<p><b>Thailand</b> See comment in Section 4.</p>
<p><b>4.4 Colours</b></p>	<p><b>USA</b> Delete table and instead refer to the GSFA</p>
<p>The table on Colours</p>	<p><b>Thailand</b> See comment in Section 4 Section 4.4; - Food additives in square brackets are not used in chili sauce production in Thailand.</p>

	- The food additives and their maximum levels in curly brackets have been endorsed by CCFA for used in food category 12.6.2. We consider that there is no need to request CCFA for inclusion of notes to GSFA for allowance of specific levels of those food additives.
	<b>Malaysia</b> Malaysia notes curcumin has not included in GSFA for F.C. 12.6.2
<b>4.5 Preservatives</b>	<b>Thailand</b> See comment in Section 4.
<b>4.5 Preservatives</b>	<b>USA</b> Delete table and instead refer to the GSFA
The table on Preservatives	<b>Thailand</b> See comment in Section 4 Please be noted that "Sodium sorbate (INS No. 201)" has been removed from the permitted additive lists of the latest GSFA for food category 12.6 and 12.6.2.
<b>4.6 Emulsifiers</b>	<b>Thailand</b> See comment in Section 4.
<b>4.6 Emulsifiers</b>	<b>USA</b> Delete table and instead refer to the GSFA
The table on Emulsifiers	<b>Thailand</b> See comment in Section 4 Section 4.6; - Food additives in square brackets are not used in chili sauce production in Thailand. - The food additives and their maximum levels in curly brackets have been endorsed by CCFA for used in food category 12.6.2. We consider that there is no need to request CCFA for inclusion of notes to GSFA for allowance of specific levels of those food additives.
<b>4.7 Sweeteners</b>	<b>Thailand</b> See comment in Section 4.
<b>4.7 Sweeteners</b>	<b>USA</b> Delete table and instead refer to the GSFA
The table on Sweeteners	<b>Thailand</b> See comment in Section 4 Section 4.7, the food additives and their maximum levels in curly brackets have been endorsed by CCFA for used in food category 12.6.2. We consider that there is no need to request CCFA for inclusion of notes to GSFA for allowance of specific levels of those food additives.
<b>4.8 Stabilizers</b>	<b>Thailand</b> See comment in Section 4.
<b>4.8 Stabilizers</b>	<b>USA</b> Delete table and instead refer to the GSFA

The table on Stabilizers	<b>Thailand</b> See comment in Section 4
<b>4.9 Thickeners</b>	<b>Thailand</b> See comment in Section 4.
<b>4.9 Thickeners</b>	<b>USA</b> Delete table and instead refer to the GSFA
The table on Thickeners	<b>Thailand</b> See comment in Section 4 Section 4.9, Food additives in square brackets are not used in chili sauce production in Thailand.
<b>7.1.2 Classification of “Defectives”</b>	
A container that fails to meet the requirement for minimum fill of Section 7.1.1 should be considered as a “defective”.	<b>CCTA</b> ... as "defective".
<b>8. LABELLING</b>	
<b>8.1.1</b> The name of the product shall be “Chili-“Hot sauce”, “Sweet chili-“Hot pepper sauce” or other names in accordance with the composition and the law and custom of the country in which the product is sold and in the manner not to mislead the consumer.	<b>Saint Kitts and Nevis</b> “chili” peppers are a type of hot pepper. There are many different types of hot peppers. It is unfair to use chili peppers to represent all hot peppers. Additionally, a large portion of the Caribbean islands use the words “hot pepper sauce” or “hot sauce” because we recognise this fact. Recommend changing: The name of the product shall be “Chili sauce”, “Sweet chili sauce”... Change to: The name of the product shall be “Hot sauce”, “Hot pepper sauce”
<b><u>[8.1 bis DECLARATION OF THE PERCENTAGE OF NATURAL TOTAL SOLUBLE SOLIDS</u></b>	<b>Thailand</b> Section 8.1 bis should be deleted as a consequence of our proposal to delete Section 3.2.1 (d) Total Soluble Solids (TSS).
<b><u>[8.1 bis DECLARATION OF THE PERCENTAGE OF NATURAL TOTAL SOLUBLE SOLIDS</u></b>	<b>Malaysia</b> Malaysia appreciates if could give further information on the intention of declaration of “Natural Total Soluble Solids” and would like to seek clarification on the definition of “Natural Total Soluble Solids”
<b><u>[8.1 bis-2 DECLARATION OF THE PERCENTAGE OF NATURAL TOTAL SOLUBLE SOLIDS</u></b>	<b>Malaysia</b> Malaysia notes the numbering should be “8.2”
<b><u>The percentage solids may be included on the label in either of the following manners:</u></b> <b><u>(a) The minimum percentage of natural total soluble solids (example: “Minimum Solids - 20%”).</u></b>	<b>Thailand</b> See comment in section 8.1.
<b><u>(a) The minimum percentage of natural total soluble solids (example: “Minimum Solids - XX20%)%”).</u></b>	<b>Malaysia</b> Malaysia proposes no reference specific number included in example.
<b><u>(b) A range within 2% of the natural total soluble solids (example: “Solids – 20% to 22%”).]</u></b>	<b>Thailand</b> See comment in section 8.1.
<b>8.2 Labelling of non-retail containers</b>	



<b>8.23</b> Labelling of non-retail containers	<b>Malaysia</b> Malaysia notes the numbering should be "8.3"
<b>METHODS OF ANALYSIS AND SAMPLING<sup>2</sup></b>	<b>Thailand</b> The methods of analysis for pH and Fill of containers are already covered by CXS 234-1999; therefore, the Table should be deleted.
<b>METHODS OF ANALYSIS AND SAMPLING<sup>2</sup></b>	<b>Saint Kitts and Nevis</b> Method of Analyses should be recommended so as not to alienate other testing methods which may have equivalence and validity. Recommend removing Method of Analysis as a Normative reference.
The table on methods	<b>Thailand</b> The methods of analysis for pH and Fill of containers are already covered by CXS 234-1999; therefore, the Table should be deleted.
The table on methods	<b>Saint Kitts and Nevis</b> pH – not sure if the method for pH takes into account oil based infusions.
The table on sampling plan	<b>Saint Kitts and Nevis</b> Sampling plan – The sampling plan is designed for large production but does not take into account micro enterprises that may make less than 100 bottles which is sometimes the case in small island states. Recommend revising the sampling plan and using the statistical formula for minimum number of samples based on size