

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

CX 5/10.2

CL 2012/35-CS
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TO: Codex contact points
Interested international organizations

FROM: Secretariat of the Codex Alimentarius Commission
Joint FAO/WHO Food Standards Programme
00153 Rome, Italy

SUBJECT: Request for Comments at Step 3 of the Procedure on the Proposed Draft Codex Standard for Non-Centrifugated Dehydrated Sugar Cane Juice

DEADLINE: 31 January 2013

COMMENTS: **to:** Mr. Javier MUÑOZ IBARRA
Adviser
Ministry of Trade, Industry and Tourism
Calle 28 # 13 A 15.
Bogotá D.C.
Phone: +571 6067676 Ext. 1205
Fax: +571- 6064777
E-mail: jmunoz@mincomercio.gov.co
(preferred)

with copy to: Secretariat
Joint FAO/WHO Food Standards Programme
Viale delle Terme di Caracalla
00153 Rome, Italy
Fax: +39 06 5705 4593
E-mail: codex@fao.org
(preferred)

BACKGROUND

1. The 34th session of the Codex Alimentarius Commission (July 2011) approved the development of a Codex Standard for Panela under the Committee on Sugars led by Colombia¹. The Codex Secretariat circulated the Proposed draft Standard for Panela at Step 3 through Circular Letter CL 2011/25-CS. The comments received are attached, in their original language, in Annex II of this document.
2. The Commission recalled that the development of a Standard for Panela had been approved as new work by the 34th session of the Commission and that the timeframe for completion of this work was the 36th session of the Commission in 2013.
3. The Delegation of Colombia, as Chair of the Committee on Sugars, informed the Commission about the status of development of this Standard. The Delegation indicated that, based on the comments submitted, the main issues surrounding the development of the Standard related to the clear placement of the product in the General Standard for Food Additives (GSFA), which might require revision of the description of the relevant food category of the GSFA, and the definition of the physical and chemical characteristics of the product. The Delegation noted that the Standard should be ready for adoption at Step 5/8 by the next Session of the Commission, in compliance with the timeframe allocated for completion of this work.
4. The Commission noted the status of work on the Standard for Panela and looked forward to the final adoption of this Standard at its next Session.²
5. As host country of the Committee on Sugars, Colombia reviewed the comments received in response to CL 2011/25-CS and produced a revised proposed draft standard which is attached in Annex I of this circular letter for comments at Step 3.

EXPLANATORY NOTES ON THE REVISED TEXT

Name of Product

6. With regard to the name of the product, the comments received led to a proposed change in name from "Panela" to "**Non-Centrifugated Dehydrated Sugar Cane Juice**". However, given the risks inherent in listing the different common names in a footnote, submission of this document will be accompanied by a consultation of Codex members to confirm that the reported names correspond to the content of the revised proposed draft standard, the aim being to facilitate the international application of the document.

¹ REP11/CAC, paragraphs 143-145 and Appendix VI.

² REP12/CAC, paragraphs 166-168.

7. By way of guidance, the following names have been reported in selected countries or regions: Chancaca (Chile, Ecuador and Peru); Kokuto (Japan); Gur or Jaggery (India); Jaggery and Khandsari (South Asia); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and some countries of Central America); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Tapa de Dulce, Dulce Granulado (Costa Rica).

Physical-chemical requirements

8. With regard to the physical-chemical requirements of the product, we believe that the presence of saccharose, reducing sugars and minerals are the elements that distinguish the product, resulting from its manufacturing process. The stated values of these elements are the result of laboratory analysis of a national sample. However, aware that there are variables influencing the characteristics of the product and, in order to reach a consensus, we would again appreciate your specific comments of the elements and their corresponding values.

Food additives

9. In accordance with the attached comments on "Section 4. Food Additives" and following the guidelines set out in section II of the Procedural Manual, the General Standard for Food Additives (Codex STAN 192-1995) was examined to include a reference to this Standard, but the product subject of the proposed draft standard was not found.

10. Given the precedent that the General Standard for Food Additives (GSFA) should serve as the appropriate reference for food additives and that the Codex commodity committees have the responsibility and authority to assess and justify the technological need for the use of additives in foods regulated by a commodity standard, Colombia, as Host Government of the Committee on Sugars, will request the Committee on Food Additives to examine the inclusion of the product denominated "**Non-Centrifugated Dehydrated Sugar Cane Juice**" in the General Standard for Food Additives.

11. Following a review of the food classification system employed in that standard and the descriptor for each category and sub-category, and bearing in mind the description of the product in section 2, we consider it appropriate to ask that "Non-Centrifugated Dehydrated Sugar Cane Juice" be included in category 11.1.3 which includes soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup and raw cane sugar.

12. In addition, we will request consideration of including in the commodity standard, as the only additive permitted by GMP, calcium hydroxide (INS 526) as acidity regulator, given that the hydrogen ion-pH potential needs to be kept under control during the manufacturing process of the product.

13. Two options are therefore presented for the section on additives. The first in the case where the 45th session of the CCFA in 2013 is unable to decide on the inclusion of "non-centrifugated dehydrated sugar cane juice" in category 11.1.3, the CCFA is requested to endorse the use of calcium hydroxide as acidity regulator for this product until the CCFA has made a final decision on the inclusion of this product in the relevant category of the GSFA, with a view to facilitating reference to the general standard in the commodity standard.

14. In the case where the 45th session of the CCFA were to decide positively on including "non-centrifugated dehydrated sugar cane juice" in GSFA category 11.1.3, general reference to the GSFA for the functional class "acidity regulators" would be incorporated into the standard for "non-centrifugated dehydrated sugar cane juice" and calcium hydroxide would be incorporated under GMP in the functional class "acidity regulators" for category 11.1.3 in the GSFA.

15. The second option would permit flexibility in updating the provisions on additives for this product, once the work of the Committee on Sugars on the standard for non-centrifugated dehydrated sugar cane juice has been completed, allowing possible incorporations of functional classes and corresponding additives in the CCFA during examination of the GSFA, with a consequent amendment to the additives section of the commodity standard should there be a need to include other functional classes identified as technologically necessary in the future, with corresponding additives listed directly in the GSFA.

Methods of analysis

16. The methods of analysis have been adjusted to reflect comments and recommended practices. Corresponding types of analysis have not been included, as this decision has been left to the Committee on Methods of Analysis and Sampling during the process of endorsement.

REQUEST FOR COMMENTS

17. Codex Members and Observers interested in a standard for this product are invited to send their comments as indicated on the front page, with consideration given to the explanations provided in these notes.

**PROPOSED DRAFT CODEX STANDARD FOR
NON-CENTRIFUGATED DEHYDRATED SUGAR CANE JUICE³**

1. SCOPE

This standard applies to non-centrifugated dehydrated sugar cane juice, as defined in section 2, intended for human consumption, including for catering purposes or re-packaging if required, as well as to the product intended for further processing, where indicated.

2. PRODUCT DEFINITION

“Non-centrifugated dehydrated sugar cane juice” is defined as the product, in any form or presentation, obtained from the evaporation of sugar cane juice *Saccharum officinarum L.*, which contains amorphous subhedral or anedral microcrystals, invisible to the naked eye, which maintains its constituent elements, such as saccharose, glucose, fructose and minerals, and which is not obtained from the reconstitution of its elements (sugars).

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 ESSENTIAL COMPOSITION

3.1.1 Basic ingredients

Sugar cane juice *Saccharum officinarum L.*

3.2 QUALITY FACTORS

3.2.1 Colour

“Non-centrifugated dehydrated sugar cane juice” may exist in various colours characteristic of the product, depending, among other aspects, on the sugar cane variety, the agro-ecological conditions of cultivation and the technologies of the manufacturing process.

3.2.2 Flavour and aroma

The flavour and aroma shall be characteristic of the product.

3.2.3 Defects

The product shall be free from defects such as foreign materials or softening. It may not be fermented nor show signs of attack by fungi or insects.

3.2.4 Physical and chemical characteristics

“Non-centrifugated dehydrated sugar cane juice” shall fulfil the conditions shown in tables 1 and 2, as appropriate.

Table1. Physical-chemical requirements for solid “non-centrifugated dehydrated sugar cane juice”

Requirement	Value	
	Min.	Max.
Moisture, mass fraction %	--	9.0
Ashes, mass fraction %	0.8	--
Total sugars (saccharose), mass fraction %	--	83.0
Reducing sugars (glucose), mass fraction %	5.5	--
Proteins % (N ×6.25)	0.2	--
Potassium mg/100 g	100.0	--
Calcium mg/100 g	10.0	--
Phosphorous mg/100 g	5.0	--
Iron mg/100 g	1.5	--

³ [Names used in certain regions: (...)]

Table 2. Physical-chemical requirements for granulated “non-centrifugated dehydrated sugar cane juice”

Requirement	Value	
	Min.	Max.
Moisture, mass fraction %	--	5.0
Ashes, mass fraction %	1.0	--
Total sugars (saccharose), mass fraction %	--	93.0
Reducing sugars (glucose), mass fraction %	5.0	--
Proteins % (N ×6.25)	0.2	--
Potassium mg/100 g	100.0	--
Calcium mg/100 g	10.0	--
Phosphorous mg/100 g	5.0	--
Iron mg/100 g	1.5	--

4. FOOD ADDITIVES

Option 1

Only the food additive class indicated below is technologically justified and may be used in products covered by this standard. Within this additive class only those indicated may be used and only for the function indicated and within the limits specified.

4.1 ACIDITY REGULATORS

INS No.	Name of food additive	Maximum level
526	Calcium hydroxide	GMP

Option 2

Acidity regulators used in accordance with Tables 1 and 2 of the General Standard for Food Additives in food category 11.1.3 soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw sugar cane and non-centrifugated dehydrated sugar cane juice or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

5 CONTAMINANTS

5.1 The products covered by this standard shall comply with the maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

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

6 HYGIENE

6.1 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 Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1-1969), and other relevant Codex texts, such as codes of practice and codes of hygienic practice.

6.2 The product shall comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21-1997).

7 LABELLING

The product covered by the provisions of this standard shall be labelled in accordance with the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985). In addition, the following specific provisions shall apply:

7.1 NAME OF THE PRODUCT

7.1.1 The name of the product “non-centrifugated dehydrated sugar cane juice” may be followed by the common or ordinary name accepted in the country of origin or of retail sale.

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

- a) Non-centrifugated dehydrated sugar cane juice (common name of the product, e.g. "Solid Panela").
- b) Non-centrifugated dehydrated sugar cane juice (common name of the product, e.g. "Granulated Panela").

8. **METHODS OF ANALYSIS AND SAMPLING**

Provision	Method	Principle	Type
Moisture	AOAC 925.45	Loss on drying	
Ash	AOAC 900.02	Incineration	
Total sugars (saccharose) and reducing sugars (glucose)	AOAC 923.09	Volumetry	
Calcium, iron and potassium	AOAC 985.35	Spectrophotometry by flame atomic absorption	
Phosphorous	AOAC 995.11	Colorimetry	
Sulphites	AOAC 975.32 and AOAC 990.28	Monier Williams	

ANNEX II

**COMMENTS SUBMITTED IN REPLY TO CL 2011/25-CS
(AVAILABLE ONLY IN ORIGINAL LANGUAGE)**

BRAZIL/BRÉSIL/BRASIL

General comments:

Brazil congratulates Colombia for taking this work on a new Codex Standard that covers the Non-Centrifugal Sugars “panela” (“rapadura” in Brazil) and ground “panela” (“açúcar mascavo” in Brazil).

Assessing the particularities of sugar process, Brazil would like to highlight that not only the adopted process, but also Sulfur Dioxide provisions for the proposed draft standard for Panela should diverge from white and brown sugars on Codex Standard for Sugars (Codex Stan 212/1999).

Panela is first evaporated without the use of sulphites and white and brown sugars are crystallized and sulphated.

In that sense considering the extensive list of denominations for the product (footnote nr 2 of the proposed Draft) and the approach adopted for the Codex Standard for Sugars (Codex Stan 212/1999 encompassing a broad range of sugars), Brazil would like to suggest amending the title of the proposed Draft from “Codex Standard for Panela” to “Codex Standard for Non-Centrifugal Sugars”.

This approach is in line with FAO stats and definitions (<http://www.fao.org/es/faodef/fdef03e.htm>) and brings flexibility to the Standard allowing development of a standard for “Panela” and “ground Panela” amid possible inclusion of products that are not closely related with “Panela” provisions and not listed in the proposed Draft.

Specific Comments:

Current provision at the Proposed Draft Standard
<p>1. SCOPE</p> <p>This Standard is applicable to panela as defined in section 2 infra, for direct consumption; as well as to the product intended for subsequent processing, where indicated. The present standard establishes the requirements and testing to which panela, in its different presentations, must submit.</p>
Proposal
<p>1. SCOPE</p> <p>This Standard is applicable to panela panela non-centrifugal sugars, as defined in section 2 below infra, intended for human consumption. This Standard does not cover products that have been flavoured and/or undergone further processing as well as products obtained from the reconstitution of its elements (sugars), for direct consumption; as well as to the product intended for subsequent processing, where indicated. The present standard establishes the requirements and testing to which panela, in its different presentations, must submit.</p>
Rationale
<p>Brazil would like to highlight that trying to embrace all panela presentations (both basic, formulated and/or flavoured panela) may not be feasible.</p> <p>Formulated and/or flavoured products impacts composition table values and negatively affects both analysis and final results.</p> <p>Other proposed changes are editorial and aligned with recent standards approved by other Codex Commodity Committees to keep text simple.</p>

Current provision at the Proposed Draft Standard
<p>2. DESCRIPTION</p> <p>2.1 PRODUCT DEFINITION</p> <p>Panela is defined as the product, in any form or presentation, obtained from the evaporation of sugarcane juice <i>Saccharum officinarum</i> L., without centrifuging, which contains amorphous subhedral or anhedral microcrystals, invisible to the naked eye, which maintains its constituent elements, such as saccharose, glucose, fructose and minerals, and is not obtained from the reconstitution of its elements (sugars).</p>
Proposal
<p>2. DESCRIPTION</p> <p>2.1 PRODUCT DEFINITION</p> <p><u>Non-centrifugal sugar</u> is the product obtained from the evaporation of sugarcane juice <i>Saccharum officinarum</i> L. <u>processed</u> without <u>centrifugation</u> and <u>non sulphited; containing</u> microcrystals and <u>maintaining its constituent elements, such as saccharose, glucose, fructose and minerals.</u></p> <p><u>2.2 NON-CENTRIFUGAL SUGAR TYPES (COMMON NAMES)</u></p> <p><u>The commonly known names as indicated below shall be used, bearing the product is in accordance with the provisions of this standard: Chancaca (Chile, Ecuador and Peru); Cokuto (Japan); Gur or Jaggery (India); Jaggery and Khandsari (South Asia); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and certain Central American countries); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Açúcar mascavo (Brazil); Tapa de dulce, dulce granulado (Costa Rica).</u></p>
Rationale
<p>Editorial:</p> <p>removal of "in any form of presentation" - the forms of presentation are already listed on section 2.2 of the Draft.</p> <p>reallocation of "and is not obtained from the reconstitution of its elements (sugars)" to the Scope as this is more related to the limits of the Standard.</p> <p>removal of adjectives for microcrystals to keep the standard simple.</p> <p>Explicitly specify that non-centrifugal sugars are not sulphated during process. Besides, according to Brazilian regulation Sulphur dioxide is not allowed for açúcar mascavo and rapadura. As sulphite addition is not a processing step of non-centrifugal sugars this should be highlighted on the proposed standard.</p> <p>inclusion of section 2.2 to illustrate possible names to be adopted in section 7 (Labelling). If the process of any of the listed regional products differs from 2.1 then a sub section should be adopted to address the differences as well as a new column on the proposed tables.</p> <p>Other minor editorial changes to keep text simple.</p>
We would like to highlight that a specific footnote should be added on food sub-category 11.1.3 Soft white sugar - Excluding panela

Current provision at the Proposed Draft Standard
<p>3.2.2 Flavour and aroma</p> <p>The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign substances. The aroma will be that characteristic of the product without any undesirable odour.</p> <p>In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.</p>
Proposal
<p>3.2.2 Flavour and aroma</p> <p>The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign substances. The aroma will be that characteristic of the product without any undesirable odour.</p> <p>In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.</p>
Rationale
Flavoured products should not be within the scope of the Standard as stated before.

Current provision at the Proposed Draft Standard		
3.2.4 Physical and chemical characteristics		
	Table 1	Table 2
Ashes, mass fraction%	0.8 (mín)	1.0 (mín)
Non-reducing sugars, mass fraction%	83.0 (máx)	93.0 (máx)
Potassium mg/100 g	100.0 (mín)	100.0 (mín)
Proposal		
3.2.4 Physical and chemical characteristics		
	Table 1	Table 2
Ashes, mass fraction%	0.7 (mín)	0.8 (mín)
Non-reducing sugars, mass fraction%	81.0 (mín)	84.0 (mín)
Potassium mg/100 g	60.0 (mín)	60.0 (mín)
Rationale		
Proposed values are needed to encompass Brazilian Rapadura and Açúcar mascavo.		

Current provision at the Proposed Draft Standard
4. FOOD ADDITIVES
Comment and Rationale
<p>Although INS 338 – Phosphoric acid (GMP) was included as an acidity regulator (section 4.1) Brazil would like to highlight that JECFA established a MTDI of 70mg/kg for phosphorus.</p> <p>In that sense it is advisable to discuss a maximum level which is technologically justified for INS 338.</p> <p>http://www.fao.org/ag/agn/jecfa-additives/specs/Monograph1/Additive-312.pdf</p>

Current provision at the Proposed Draft Standard
4.3 In relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs.
Proposal
4.3 In relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs.
Rationale
<p>Flavoured products should not be within the scope of the Standard as stated before.</p> <p>Whilst proposed, Colorants should detail a list of colorants with their numeric values, according to their established IDA by JECFA.</p>

Current provision at the Proposed Draft Standard
7. LABELLING
7.1 NAME OF THE PRODUCT
7.1.1 The product name will be “Panela” followed by the ordinary name currently accepted in the country of retail sale.
7.1.2 The labelling shall specify any aroma or flavouring characterizing the product. The food name “Panela” shall be accompanied by the phrases “aromatized with x” or “flavoured with x”, as the case may be.
7.1.3 The form of presentation (styles) shall be included as part of the name as follows:
a) “Solid Panela”.
b) “Granulated Panela”.
Proposal
7. LABELLING
7.1 NAME OF THE PRODUCT
7.1.1 <u>The name of the product shall be the commonly known names as indicated in Section 2.2.</u>
<u>The product name may be followed by the ordinary name currently accepted in the country of retail sale.</u>

<p>7.1.2 The labelling shall specify any aroma or flavouring characterizing the product. The food name “Panola” shall be accompanied by the phrases “aromatized with x” or “flavoured with x”, as the case may be.</p> <p>7.1.3 The form of presentation (styles) shall be included as part of the name as follows:</p> <p>a) “Solid Panola (name of the product)”.</p> <p>b) “Granulated Panola (name of the product)”.</p>
Rationale
<p>Panola is a regional name and its use worldwide may not be feasible and/or clear enough for a Codex Standard.</p> <p>Flavoured products should not be within the scope of the Standard as stated before.</p>

Current provision at the Proposed Draft Standard				
8 METHODS OF ANALYSIS AND SAMPLING				
Provision	Method	Principle	Type	Preparation of the sample
Moisture	AOAC 925.45	<i>Gravimetry, dried at atmospheric pressure</i>	IV	<i>kg of the sample is divided in two; 500 kg is crushed and then sieved, passing through mesh No. 40 (425 µm).</i>
Ash	AOAC 900.02	<i>Gravimetry</i>	-	
Total sugars (saccharose) and (glucose)	AOAC 923.09	<i>Volumetry</i>	-	
Calcium, iron and potassium	AOAC 985.35	Spectrophotometry by flame atomic absorption	III	<i>In the case of wet digestion, the sample can be prepared as follows:</i>
Phosphorous -	AOAC 995.11	<i>Colometric method</i>	-	<p><i>Starting with the sample preparation described above, 1 g is taken and dissolved in 100 mL of distilled water.</i></p> <p><i>In the case of dry digestion, by ashes, the sample is prepared as indicated in the AOAC methodologies described for each analysis.</i></p>

Proposal			
Provision	Method	Principle	Type
Moisture	AOAC 925.45B	<i>Gravimetry, dried at atmospheric pressure</i>	IV
Ash	AOAC 900.02A or B	<i>Gravimetry</i>	IV
Total sugars (saccharose) and (glucose)	AOAC 923.09 (5)	<i>Volumetry</i>	IV
Calcium, iron and potassium	AOAC 985.35	Spectrophotometry by flame atomic absorption	IV
Phosphorous -	AOAC 995.11	<i>Colorimetric method</i>	IV
Rationale			
<p>For all methods, preparation column is not within standardized text in Codex Standards.</p> <p>For all methods, please consider to classify as Type IV being all methods are not validated to non-centrifugal sugars.</p> <p>For moisture, method AOAC 925.45B is the appropriate method for sugar cane, beet sugar, as well as for refined and non refined sugars.</p> <p>For Ash, method AOAC 900.02 <u>A or B</u> are applicable to syrups.</p>			

COSTA RICA

Costa Rica agradece la atención a los siguientes comentarios:

Sección 2.

2.1 Definición del Producto:

Costa Rica sugiere incorporar el texto resaltado

Se entiende por panela el producto de cualquier forma o presentación proveniente de la **extracción, clarificación (eliminación de sólidos), evaporación, concentración y posterior moldeo de la miel** del jugo de caña de azúcar *Saccharum officinarum* L., sin centrifugar, que contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales, y que no proviene de la reconstitución de sus elementos (azúcares).

2.2 Formas de presentación

2.2.3 Costa Rica sugiere incluir la presentación de la panela saborizada y aromatizada- esto por cuanto se menciona dentro del cuerpo de la norma, pero no se especifica su denominación.

3.1.2 Otros ingredientes

Se permite la adición de otros productos alimentarios (nueces, maní, entre otros)

3.2.1 Color

Costa Rica sugiere incorporar la siguiente frase:

“Es de color amarillo, pardo o pardo oscuro”.

3.2.3 Defectos

Costa Rica sugiere incorporar la frase resaltada, ya que no se especifica en el documento qué se entiende por materia extraña:

La panela debe estar exenta de defectos tales como materias extrañas (**impurezas de origen orgánico y mineral**), ablandamiento; no puede estar fermentada ni presentar ataques de hongos y plagas.

7. Etiquetado

Costa Rica sugiere valorar la posibilidad de declarar en la etiqueta el uso de aditivos denominados sulfitos, con el fin de proporcionar información al consumidor hipersensible.

Lo anterior, debido a que algunos productores de panela utilizan estos aditivos para blanquear el producto, a lo cual su uso indiscriminado (en concentraciones de 10 mg/kg o más) puede ocasionar daños a la salud, según la Norma General del Codex para el Etiquetado de los Alimentos Preenvasados (CODEX STAN 1-1985).

Otras consideraciones:

1. Costa Rica además considera necesario incorporar en el Anteproyecto de Norma Panela, que para la elaboración de estos productos no se permite el uso de azúcar, barredura de azúcar, miel, jarabes o cualquier otro tipo de fuente de sacarosa diferente al jugo de caña de azúcar, esto con el fin de evitar el engaño al consumidor.
2. Se solicita aclarar aspecto en relación al aditivo ácido fosfórico, ya que no se encontró en la categoría de alimentos 05.2.3 en que se podría ubicar la panela.

ECUADOR / ÉQUATEUR

En atención a la CL 2011/25-CS a continuación remito las observaciones de la empresa ecuatoriana ARTEAGRICOLA CIA. LTDA. al CX 5/10.2 - CCS: CL 2011/25-CS [S] “Proposed Draft Codex Standard for Panela” (at Step 3):

1. En la parte de definición de producto dice: SIN CENTRIFUGAR, y esto no es del todo cierto, ya que en el proceso de Elaboración de panela granulada si se centrifuga la miel de caña, no ocurre esto en el proceso de panela en Bloque.
2. La denominación de PANELA es correcta sin embargo considerar que en ITALIA una empresa denominada GTC.SRL. de propiedad de Sr. Giovanni Consolli, ha registrado este nombre como marca, lo cual no debe ser permitido ya que el nombre es un genérico con el cual se conoce a esta AZUCAR INTEGRAL DE CANIA que es como técnicamente debería identificarse.

EUROPEAN UNION (MEMBER ORGANIZATION) / UNION EUROPÉENNE (ORGANISATION MEMBRE) / UNIÓN EUROPEA (ORGANIZACIÓN MIEMBRO)

General Comments

The European Union and its Member States (EUMS) do not support the inclusion of the definition of “panela” in the Food Category System (FCS) of the GSFA (paragraph 4 of CL 2011/25-CS). The EU believes that the reference to “panela” or “sugar cane juice products” would be sufficient since the definition itself will be a part of the standard for panela.

In relation to the definition, the EUMS consider that the new standard for panela should distinguish panela from sugars that are defined in the Codex Standard for Sugars (CODEX STAN 212-1999). It is particularly necessary to ensure that the definition of panela does not overlap with the definitions of standardized sugars in the Codex Standard for Sugars such as soft brown sugar or raw cane sugar. As the proposed definition for panela is very broad difficulties in distinguishing panela from sugars can be expected. Such an overlap could be avoided if the definition of panela would clarify that it is a vital criterion of panela that sugar cane juice is just thickened in the manufacturing process and has not undergone any subsequent processing step when the thickened sugar cane juice is purified.

The EUMS note the proposal to include panela in the FCS subcategory 11.1.3. In this respect the EUMS would like to highlight that the subcategory 11.1.3 exclusively contains sugars covered by the Codex Stan 212-1999. The use of food additives is considerably limited in this subcategory. Therefore, adding panela directly to this subcategory does not seem to be reasonable and other options should be considered.

The appropriate categorisation of panela in the FCS would depend, inter alia, on food additives needed and technologically justified. A proper technological justification should be provided for all additives listed in the standard. At present the proposed draft standard refers also to food grade colorants (section 4.3) and flavourings. This kind of general reference is not appropriate. No colours and no limits are specified in the standard.

Moreover, the use of food colours would be in clear conflict with the section 3.2.1 (colour) which states that panela may exist in various colours, depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process. The use of food colours would mislead the consumer in this respect. Furthermore, the use of food colours is not usual in raw or partially processed products (i.e. panela is unrefined whole cane sugar). Due to these reasons the EU questions the use of food colours in panela. The EU also questions the use of flavourings and would like to ask for clarification why flavourings are needed in unrefined cane sugar.

As for the classification under the FCS the EUMS are of the view that a new subcategory "11.1.3.3 Sugar cane juice products" could be considered. However, if the technological justification for the use of food colours and flavourings is provided then in the EUMS's view, panela should fall under the category "11.4 Other sugars and syrups" which includes more processed products.

Specific Comments

The section 4.1 Acidity regulators contains INS 338 Phosphoric acid at GMP. The EUMS would like to note that phosphoric acid is not included in Table 3 of the GSFA, therefore, the maximum level should be expressed as a numeric value.

Section 7.1.2 requires a labelling statement "*aromatized with x*" or "*flavoured with x*" in order to

- a) specify any aroma or flavourings characterising the product and
- b) in case that an aroma or flavouring alters the characteristic aroma or flavour of the product.

The labelling statements will be the same in both cases, i. e. consumers will not see from the labelling whether the flavouring/aroma added results in a characteristic flavour/aroma or in an altered one. The intention would be to inform consumers about any addition of aroma/flavour without saying the reason for the addition (i. e. provide for a characteristic or alter the aroma/flavour).

Therefore, some explanation would be needed to clarify the intention of the labelling requirements:

7.1.2 The labelling shall specify any added aroma or flavouring characterising the product or altering the characteristic aroma or flavouring. The food name "Panela" shall be accompanied by the terms "aromatized with x" or "flavoured with x", as the case may be."

As a consequence the deletion of the last sentence in section 7.1.2 is proposed.

JAPAN/JAPON/JAPÓN

Japan is pleased to provide the following comments and would like to seek some clarification on the Proposed Draft Standard for Panela and the descriptor for the Food Category 11.1.3 in GSFA as a producer of a cane sugar called *Kokutou/Kurozatou* which is obtained from the evaporation of sugarcane juice without centrifuging, and is partly exported.

Comments on the Proposed Draft Codex Standard for Panela

General Comments

First of all, we suggest that this Proposed Draft Standard be established and then included as one of sugars stipulated in the Codex Standards for Sugars (CODEX STAN 212-1999) not as a stand-alone standard. In the mean time, we would like to submit our specific comments on the Proposed Draft Standard as follows;

Specific Comments

1. Name of the Standard

Japan does not support to use “Panela” as the name of Standard because this type of sugar with a variety of names is produced in certain regions in the world and traded globally, and the name of “Panela” is commonly known in only a certain region as mentioned in this Standard. Moreover, as for the Codex Standards for Sugars (CODEX STAN 212-1999), the general English names such as “white sugar”, “soft brown sugar” and “raw cane sugar” are used. Therefore, Japan proposes that the general English name e.g., “sugarcane juice sugar” or “non-centrifuged sugar” be adopted for defining the product in this Standard, instead of “Panela”.

2. Physical and chemical characteristics (Section 3.2.4)

Table 1 and 2: Physical-chemical requirements for solid and granulated panela

- It is well known globally that the existing high content of reducing sugars which is so hygroscopic causes adverse effects such as clotting and discoloring on the preserving property and quality of sugar. Specifically regarding this type of sugar such as *kokutou* and *panela*, the high content of reducing sugars facilitates the products absorb moisture and leads to getting moldy because those sugar contain more impurities than centrifuged sugars. Therefore, the content of reducing sugars tends to be kept at level as low as possible in Japan. We suggest that maximum value of reducing sugars be defined in this Standard instead of the minimum content because of its undesirable effect on *Kokutou* as above. In addition, the recent data in Japan shows that the minimum content of reducing sugars in *Kokutou* is 1.5% and the maximum is 4.0%.
- As for non-reducing sugars, the minimum content should be defined instead of the maximum from the same reason. In addition, the recent data in Japan shows that the minimum content of non-reducing sugars in *Kokutou* is 79.0% and maximum is 88.3%.
- As reasons above, we seek a clarification on the reason why the maximum value for non-reducing sugars and the minimum value for reducing sugars are stated in this Standard.
- We would like to ask clarification regarding “Colorants” stated in this section, if “Colorants” mean food additives which should be listed in the section 4 “Food Additives”, we suggest that “Colorants” be deleted in this section and be moved to the section 4.

3. Food Additives (Section 4)

General comments on the section for Food Additives

- Although the sentence “in the corresponding Annexes are technologically justified” is stated in this section, Annexes are not found in the entire proposed draft. If there are some Annexes indicated for technological justification of food additives, we need those Annexes.
- We suggest that the new sub sections for “Processing aid”, “Colour” and “flavouring” should be established. Please refer to our comments below.

Specific comments on the section for Food AdditivesCalcium hydroxide (526)

- In Japan, Calcium hydroxide (526) is used as a processing aid in order to precipitate impurities from sugarcane juice. Therefore, Calcium hydroxide (526) should be removed from the section 4.1 “Acidity Regulators” and listed in the new sub section “Processing aid”.

An example format used for processing aids in Commodity Standards is the following:

Processing aid – Maximum use level is in line with Good Manufacturing Practices

Function	Substance
Clarifying agents/filtration aids	Calcium hydroxide

Phosphoric acid (338)

- Since Phosphoric acid has a numerical ADI, the maximum use level should be numerical not GMP. Moreover, other phosphates could be used as acidity regulators in line with the practice of the GSFA to establish food additive maximum use levels.

Colour and flavouring

- Section 4.3 states that “in relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs”. However, individual provisions of food additives with colour function and flavouring should be established. Also, if this standard needs to include “flavoured panela”, sections related to “flavoured panela” should be added to this Standard.

4. Labelling (Section 7.1)

- As mentioned above, a sugar covered by this Standard is made and traded with various names throughout the world. Thus, the “Panela”, one of the regional names, should not be used for labeling it but each regional name should be used. And if ever, in order to avoid confusion, the general English name may follow it. In addition, we need a clarification regarding the way of labeling for the product name under the section 7.1 as to whether we have to label “Kokutou” as “Panela (Kokutou)”. As reason above, we does not support the use of “Panela” as this product name.

Comments on the descriptor for the Food Category 11.1.3 “Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar” in GSFA

- We propose to add the general English name like “sugarcane juice sugar” or “non-centrifuged sugar” not “panela” to the title of this category because the name of “Panela” is commonly known in only a certain region.
- We propose to revise the descriptor. Our comment is presented in **bold font** (addition) as follows;

“Soft white sugar is fine grain purified, moist sugar, that is white in colour. Soft brown sugar is fine grain moist sugar that is light to dark brown in colour. Glucose syrup is a purified concentrated aqueous solution of nutritive saccharides derived from starch and/or inulin. Dried glucose syrup is glucose syrup from which water has been partially removed. Raw cane sugar is partially purified sucrose crystallized from partially purified cane juice without further purification. **Sugarcane juice sugar (or non-centrifuged sugar) is obtained from the evaporated sugar cane juice without centrifuging.**”

- According to the section 5 of Preamble to the GSFA, the food category descriptors are not to be legal product designations nor are they intended for labelling purposes. Therefore, it is not necessary that the entire product definition stated in the Proposed Draft Standard for Panela is included in the descriptor of Food Category 11.1.3.
- As for the product name, please refer our comment above.

MEXICO/MEXIQUE/MÉXICO**MÉXICO**

México reitera su compromiso con el Codex Alimentarius y agradece la oportunidad de realizar comentarios al Anteproyecto de Norma para la Panela, propuesto por la Delegación de Colombia, **ANTEPROYECTO DE NORMA DEL CODEX PARA LA PANELA CX 5/10.2CL 2011/25-CS 2-**

Comentarios Generales:

México desea manifestar su interés por ampliar el tiempo de revisión del anteproyecto propuesto en virtud de que en nuestro país, parte importante de la producción de panela corresponde a una especialidad artesanal, con objeto de revisar a profundidad este documento con el mayor número de productores.

Comentarios Particulares:

DICE	DEBE DECIR	JUSTIFICACION
<p>1. ÁMBITO DE APLICACIÓN</p> <p>Esta norma se aplica a la panela, según se define en la sección 2 <i>infra</i>, que está destinada al consumo directo; como también al</p> <p>producto, cuando se indique, que está destinado a una elaboración ulterior. La presente norma establece los requisitos y los ensayos que debe cumplir la panela en sus diferentes presentaciones.</p>	<p>1. ÁMBITO DE APLICACIÓN</p> <p>Esta norma establece las especificaciones y los métodos de ensayo que debe cumplir la panela, según se define en la sección 2, destinada al consumo directo.</p>	<p>Se considera que esta redacción da mayor claridad al ámbito de aplicación.</p>
<p>2. DESCRIPCIÓN</p> <p>2.1 DEFINICIÓN DEL PRODUCTO</p> <p>Se entiende por panela el producto de cualquier forma o presentación proveniente de la evaporación del jugo de caña de azúcar <i>Saccharum officinarum L.</i>, sin centrifugar, que contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales, y que no proviene de la reconstitución de sus elementos (azúcares).</p>	<p>2. DESCRIPCIÓN</p> <p>2.1 DEFINICIÓN DEL PRODUCTO</p> <p>Se entiende por panela al producto proveniente de la evaporación del jugo de caña de azúcar (<i>Saccharum officinarum L.</i>), sin centrifugar, en cualquier forma o presentación. Contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano y mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales. Se excluye de la presente norma, el producto que provenga de la reconstitución de sus elementos (azúcares).</p>	<p>Se considera que esta redacción da mayor claridad a la definición del producto.</p>
<p>2.2 FORMAS DE PRESENTACIÓN</p> <p>2.2.1 Sólida - producto macizo y compacto presentado en diferentes formas.</p> <p>2.2.2 Granulada - producto presentado en forma de granos.</p> <p>2.2.3 Otras formas de presentación - se permitirá cualquier otra forma de presentación del producto, a condición de que éste:</p> <p>a) se distinga suficientemente de las otras formas de presentación establecidas en la Norma;</p> <p>b) cumpla todos los requisitos pertinentes de la norma, incluidos los correspondientes a los factores esenciales de</p> <p>composición y calidad, y cualquier otro requisito que sea aplicable a la forma de presentación estipulada; y</p>	<p>2.2 FORMAS DE PRESENTACIÓN</p> <p>La Panela es un producto macizo y compacto que puede presentar las siguientes formas:</p> <p>2.2.1 Bloque o Moldeado.- producto macizo y compacto presentado en diferentes formas.</p> <p>2.2.2 Granulada - producto presentado en forma de granos.</p> <p>2.2.3 Otras formas de presentación</p> <p>Éstas serán permitidas, siempre y cuando el producto:</p> <p>a) se distinga suficientemente de las otras formas de presentación establecidas en la Norma;</p>	<p>Este producto generalmente es macizo.</p>

DICE	DEBE DECIR	JUSTIFICACION
<p>c) se describa debidamente en la etiqueta para evitar errores o confusión por parte del consumidor.</p>	<p>b) cumpla todos los requisitos pertinentes de la norma, incluidos los correspondientes a los factores esenciales de composición y calidad, y cualquier otro requisito que sea aplicable a la forma de presentación estipulada; y</p> <p>c) se describa debidamente en la etiqueta para evitar errores o confusión por parte del consumidor.</p>	
<p>3. COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD</p> <p>3.1 COMPOSICIÓN ESENCIAL</p> <p>3.1.1 Ingredientes básicos</p> <p>Jugo de caña de azúcar <i>Saccharum Officinarum</i> L</p>	<p>3. COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD</p> <p>3.1 COMPOSICIÓN ESENCIAL</p> <p>3.1.1 Materia Prima</p> <p>Jugo de caña de azúcar <i>Saccharum Officinarum</i> L</p>	<p>Por la naturaleza del producto, se debe sustituir el título del 3.1.1 Ingredientes básicos por Materia Prima</p> <p>En el texto, cambiar el nombre científico a cursiva o bien subrayado.</p>
<p>3.2 FACTORES DE CALIDAD</p> <p>3.2.1 Color</p> <p>La panela puede presentar diferentes colores dependiendo, entre otros aspectos de la variedad de la caña, las condiciones agroecológicas y del proceso de elaboración.</p> <p>3.2.2 Sabor y Aroma</p> <p>El sabor será el característico del producto, sin malos sabores debidos a deterioro o a la absorción de sustancias extrañas. El aroma será el característico del producto y no deberá poseer ningún olor indeseable.</p> <p>Para la panela saborizada y aromatizada, el sabor y aroma serán los característicos del saborizante y aromatizante adicionados.</p>	<p>SIN COMENTARIOS</p>	
<p>3.2.3 Defectos</p> <p>La panela debe estar exenta de defectos tales como materias extrañas, ablandamiento; no puede estar fermentada ni presentar ataques de hongos y plagas.</p>	<p>3.2.3 Defectos-Requisitos Generales</p> <p>3.2.3.1 La panela, deberá cumplir con los criterios microbiológicos para los alimentos establecidos en CAC/GL21-1997.</p> <p>3.2.3.2 No debe presentar indicios de ataques por hongos o plagas, ablandamiento o fermentación.</p>	<p>Por las características del producto, más que defectos, se establecen requisitos generales.</p> <p>Existen criterios establecidos para materia extraña por el propio Codex Alimentarius.</p>

DICE	DEBE DECIR	JUSTIFICACION
3.2.4 Características físicas y químicas		
<p>La panela debe cumplir con lo indicado en los cuadros 1 y 2.</p> <p>Cuadro 1. Requisitos físico químicos para la panela sólida</p> <p>Cuadro 2. Requisitos físico químicos para la panela granulada</p>	<p>México se abstiene de comentar estas tablas hasta evaluar estas especificaciones con los análisis de los productores de panela.</p>	<p>Se estará trabajando con los productores de panela con objeto de comparar las especificaciones propuestas en el anteproyecto con las nacionales.</p>
<p>4. ADITIVOS ALIMENTARIOS</p> <p>Solo las clases de aditivos alimentarios indicadas abajo están tecnológicamente justificadas y pueden ser empleadas en productos amparados por esta Norma. Dentro de cada clase de aditivo solo aquellos aditivos alimentarios indicados abajo, o relacionados, pueden ser empleados y solo para aquellas funciones, y dentro de los límites, especificados.</p>		<p>Se estará trabajando con los productores de panela con objeto de comparar las especificaciones propuestas en el anteproyecto con las nacionales.</p>
<p>4.1 Reguladores de la Acidez</p>	<p>Se propone que la información incluida en el 4.1 Reguladores de la Acidez</p> <p>a) Incorpore la dosis máxima de uso acorde a algún referente CODEX</p> <p>b) Excluya la columna para dosis máxima de uso, ya que en muchos casos, estas especificaciones son Regulaciones de cada país.</p>	
<p>4.2 Antiaglutinantes</p>	<p>Mismo comentario que para 4.1</p>	
<p>4.3 En relación específica a la variedad panela saborizada se puede permitir el uso de saborizantes y colorantes de grado alimenticio limitando el uso a las BPM</p>	<p>Mismo comentario que para 4.1</p>	
<p>8. MÉTODOS DE ANÁLISIS Y MUESTREO</p> <p>El anteproyecto de norma para panela, contempla Métodos de Prueba AOAC.</p>	<p>8. MÉTODOS DE ANÁLISIS Y MUESTREO</p> <p>Modificar los Métodos de Prueba para humedad, cenizas, azúcares totales, Calcio, Hierro y Potasio, conforme a la propuesta descrita a continuación:</p>	<p>En el mercado internacional los métodos de prueba aceptados mundialmente son los métodos establecidos en ICUMSA, lo que representa un estándar global.</p>

Métodos de Análisis y Muestreo

Disposición	Método	Principio
Humedad	GS2/1/3/9-15 (2007)	Determinación de la humedad del azúcar por pérdida en el secado-Oficial
Cenizas	GS2/3-17 (2002)	Determinación de cenizas conductimétricas en productos de azúcar refinado-Oficial.
Azúcares totales (sacarosa) y reductores (glucosa)	GS2/3-9-5 (2007)	Determinación de azúcares reductores en azúcar purificado mediante el método EDTA de Knight y Allen-Oficial
Calcio, Hierro y Potasio	GS2/3/7/8-31 (1994); GS2/3-29 (1994)	Determinación de hierro en productos de azúcar refinado y en soluciones de azúcar mediante un método colorimétrico-Aceptado.
Fósforo	AOAC 995.11	Método colorimétrico

PHILIPPINES / FILIPINAS

Hereunder are the comments from the Philippines for your consideration. Thank you.

On amendment of the GSFA:

The Philippines request clarification regarding the proposal to amend 11.1.3 and not 11.2 of the GSFA. While the proposal is to amend Subcategory 11.1.3 of the Codex GSFA which includes soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, and raw cane sugar, amending Subcategory 11.2 (“Brown sugar excluding products of food category 11.1.3; Includes large-grain, brown or yellow lump sugars, such as Demerara sugar.”) should be considered instead. Panela could be defined separately after Demerara to distinguish this from Demerara. Panela, as a brown sugar, is more closely related to Demerara and should be classified with it rather than classifying it together with soft white sugar and soft brown sugar which are specialty sugars obtained from refined sugar. On the other hand, while Demerara passes through centrifugals, it is not obtained from refined sugar but is also processed directly from cane juice..

General Comments:

The Philippines would like to bring the attention of the Committee on the use of “Panela” as the name of the Standard. Similarly, we would like to emphasize that “Panela” is not the generic name for this type of sugar. Panela may be the name used in certain countries like Bolivia, Colombia, Honduras, Nicaragua, Panama and others; however, this is not the term used in many other countries, as indicated in the footnote of the title. Such usage will have a profound trade impact particularly in the labelling of the product. In view thereof, the Philippines would like to seek clarification from the Codex Secretariat and Codex member countries in addressing this concern.

For now, the Philippines would like to propose the following amendment to the footnote in the title:

~~Commonly known~~ **Equivalent to** in certain regions as: Chancaca (Chile, Ecuador and Peru); Cokuto (Japan); Gur or Jaggery (India); Jaggery and Khandsari (South Asia); **Muscovado (Philippines)**; Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and certain Central American countries); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Tapa de dulce, dulce granulado (Costa Rica).

1. SCOPE

The Philippines would like to seek clarification on the facet “for direct consumption” as used in the scope of the standard and recommend the use of the phrase “for human consumption” instead.

2. DESCRIPTION

2.1 Product Definition

For clarity, the Philippines proposes the following edits to the definition:

Panela is defined as the product, in any form or presentation, obtained from the evaporation of juice from sugarcane *Saccharum officinarum* L., without centrifugation. It contains only natural anhydrous microcrystals of sucrose, of irregular shape, not visible to the naked eye which is surrounded by molasses and other constituents of sugarcane. It may be flavoured, aromatized, and should not be obtained from the reconstitution of its primary components.

2.2 Forms of Presentation (~~Styles~~)

2.2.1 Amorphous – product presented in powder form

2.2.1.2 Solid Lump – solid and/or compact product presented in different form

The Philippines notes that if this form includes granulated sugar, then we propose to delete the word compact as well.

~~2.2.2 Granulated – product presented in grain form~~

Rationale: Amorphous is the most common form presented for this kind of sugar, hence we are proposing to add it in the list. Similarly, solid is changed to lump, as the latter is the most frequently used term in international trade. Granulated on the other hand is mostly considered as lump depending on the size of the granule as per specificities prescribed by the importing countries or traders.

We also support to retain the following section:

2.2.3 Other forms of presentation - Any other presentation of the product should be permitted provided that the product:

- a) is sufficiently distinctive from other forms of presentation laid down in the Standard;
- b) meets all relevant requirements of the Standard, including those requirements relating to essential composition and quality factors, and any other requirements which are applicable to the stipulated form of presentation; and
- c) It fulfils all the requirements relating to the standard, including the essential composition and quality factors, and any other requirement that is applicable to the stipulated form of presentation;

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

~~3.1 ESSENTIAL COMPOSITION~~

~~3.1.1 Basic ingredients~~

~~Sugarcane juice (*Saccharum Officinarum* L)~~

3.2 QUALITY FACTORS

3.2.1 Colour

~~Panela may exist in various colours, depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process.~~

~~3.2.2 Flavour and aroma~~

~~The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign~~

~~substances. The aroma will be that characteristic of the product without any undesirable odour. In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.~~

3.2.3 Defects

The panela will be free from defects such as foreign materials or softening. It may not be fermented or show signs of attacks by fungi and pests.

The Philippines proposes that 3.2.3 Defects of this section be deleted and be included as Foreign Matters, a section to be added after Contaminants.

Moreover, the Philippines is proposing the following edits for clarity:

3.1 ESSENTIAL COMPOSITION

Panela sugar is essentially composed of sucrose and molasses.

3.2 QUALITY FACTORS

The Panela sugar should have the characteristic aroma and flavour of the sugarcane from where it is made and color ranging from dark brown to golden yellow. It should also be free from objectionable sensory characteristics.

The Philippines is also of the view that only the following main physical and chemical characteristics are essential and should be included. Some terms are changed for consistency with the Codex Standard for Sugars (Codex Stan 212-1999) and ICUMSA (International Commission for Uniform Methods of Sugar Analysis). Values are put in square brackets subject for submission of data from member countries and approved methods of analysis.

3.2.4 Physical and chemical characteristics

Panela will fulfil the conditions in tables 1 and 2

Table 1 Physical-chemical requirements for solid lump panela

Requirement	Value	
	Min.	Max.
Moisture, mass fraction% Loss on drying, %, maximum	-	[9.0]
Conductivity Ash, mass fraction%, maximum	[0.8]	[-]
Non-reducing sugars, mass fraction% Polarization, °Z, minimum	[-]	[83.0]
Reducing sugars, mass fraction%, maximum	[5.5]	[-]
Proteins% (N x 6.25)	0.2	-
Potassium mg/100g	100.0	-
Calcium mg/100g	10.0	-
Phosphorous mg/100g	5.0	-
Iron mg/100g	1.5	-
Colorants	Absence	

Table 2 Physical-chemical requirements for granulated amorphous panels

Requirement	Value	
	Min.	Max.
Moisture, mass fraction% Loss on drying %, maximum	-	[5.0]
Conductivity Ash mass fraction%, maximum	[1.0]	[-]
Non-reducing sugars, mass fraction% Polarization , °Z, minimum	[-]	[93.0]
Reducing sugars, mass fraction%, maximum	[5.0]	[-]
Proteins% (N x 6.25)	0.2	-
Potassium mg/100g	100.0	-
Calcium mg/100g	10.0	-
Phosphorous mg/100g	5.0	-
Iron mg/100g	1.5	-
Colorants	Absence	

Comments: For Polarization minimum values should be specified not the maximum values (since the higher the polarization value the better the quality of the sugar). For ash and reducing sugar, maximum levels should be specified.

4. FOOD ADDITIVES

In light of the recommendation for the amendment of Subcategory 11.1.3 of the GSFA, the Philippines maintains that this section should only make cross-reference to the GSFA instead of explicitly prescribing list of additives, to wit:

All food additives must meet the latest Codex General Standard for Food Additives (GSFA) (Codex Stan 192-1995).

5. CONTAMINANTS

The Philippines proposes the following sub-headings to this section, to wit:

5.1 HEAVY METALS

The product covered by this Standard shall comply with the maximum levels of the Codex General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

5.2 PESTICIDE RESIDUES

The products covered by this standard should comply with those maximum residue limits established by the Codex Alimentarius Commission.

6. FOREIGN MATTERS

The product should be free from foreign matters but may not be limited to dead insects, twigs and metals.

6-7. HYGIENE

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 Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1 – 1969), and other relevant Codex texts such as Codes of Hygienic Practice and codes of practice.

The products should comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21 – 1997).

7. 8. LABELLING

The Philippines opposes to the use of “Panela” as the primary name for this type of sugar. Until such time that the Codex Secretariat or Codex member countries resolve this, we provisionally therefore propose the following edits to the 7.1 Name of the Product”

7.8.1.1 The product name will be “Panela” ~~followed by the ordinary name currently accepted in the country of retail sale or its equivalent name from~~ in the country of origin.

7.8.1.2 In the case of flavoured or aromatized Panela, the labelling shall specify any aroma or flavouring characterizing the product. The food name “Panela” or its equivalent name ~~from~~ in the country of origin shall be accompanied by the following phrases: “aromatized with x” or “flavoured with x”. ~~as the case may be.~~

~~If the addition of an aroma or flavouring alters the characteristic aroma or flavour of the product, the name of the food shall be accompanied by the terms “aromatized with x” or “flavoured with x”, as the case may be.~~

7.8.1.3 The form of presentation (~~styles~~) shall be included as part of the name as follows:

- a) ~~“Solid Lump Panela”~~. Amorphous Panela
- b) ~~“Granulated Panela”~~. Lump Panela

~~7.1.4-c)~~ Other forms of presentation - If the product is produced in accordance with the other forms provision (section 2.2.3), the label should contain in close proximity to the name of the product such additional words or phrases ~~that will avoid misleading or confusing the consumer.~~

8. 9. METHODS OF ANALYSIS AND SAMPLING

See Volume 13 of the *Codex Alimentarius* and other relevant *International Commission for Uniform Methods of Sugar Analysis (ICUMSA)* methods.

Finally, in consonance with the above proposed changes on physical and chemical properties for panela, the Philippines hereby submits the following essential composition and quality factors including methods of analysis:

Characteristics	Specification as Produced			Methods of Analysis
	Powder Class A	Powder Class B	Lump	
Polarization ⁰ Z, minimum	86.00	77.00	57.00	ICUMSA GS1/2/3/9-1(2007) Polarimetry
Reducing Sugar,%, maximum	7.50	12.00	28.00	ICUMSA GS1/3/7-3 (2005) Lane and Eynon Constant Volume
Loss on drying,%, maximum	3.5	4.2	2.0	ICUMSA GS2/1/3/9-15(2007) Gravimetry
Conductivity Ash,%, maximum	2.90	3.00	3.00	ICUMSA GS1/3/4/7/8-13 (1994) Conductimetry
Insoluble Matter, mg/kg, maximum	GMP	GMP	GMP	

UNITED STATES OF AMERICA / ÉTATS-UNIS D'AMÉRIQUE / ESTADOS UNIDOS DE AMÉRICA

The United States is pleased to submit the following comments in reply to CL 2011/25-CS on the Proposed Draft Standard for Panela in the Codex Committee on Sugars.

General Comments

While the United States has no specific objections to this standard, we question the general need for this standard. Additionally, this standard as currently drafted, may be excessively broad in scope by attempting to cover more than what is traditionally understood to be panela, by including artisanal products from many regions that vary in permitted composition according to local custom, and by attempting to include all possible forms and mixtures of panela with other flavors and colors. For example, We note that the footnote 1 to paragraph 4 of the background document, CX 5/10.2, and footnote 2 to the draft standard list a number of alternative names that are not necessarily “panela” although they are similar. Some may come from other sources. For example, jaggery is also variously defined as being made from palm sugars, date palms, etc., and possibly even coconut. Some definitions say that jaggery is from cane juice and gur is from palm sugar.

With respect to the reference to “Cocuto (Japan)”, this product is usually spelled “kokuto”. Kokuto, also known as “black sugar,” is exclusively from Okinawa, Japan. The Japanese also refer to it as brown sugar, but it is mostly sold as solid rectangular cakes or chunks, making it appear to be similar to panela. It is not clear whether this is really the same product being defined as “panela” here. We therefore question inclusion of many of these names absent a clarification and definition of the terms as used in the countries to which they are native.

We note that throughout the draft standard for panela, the term “saccharose” is used to refer to “sucrose”. We suggest that “saccharose” be changed to “sucrose” throughout the document. The term “sucrose” is the only common usage in English.

Specific Comments

We note that in paragraph 4 of the background document, it is proposed to amend the definition of subcategory 11.1.3 of the GSFA to “include the definition of ‘panela’ as ‘sugarcane juice’...” We suggest that, since sugarcane juice by itself is not “panela”, this should be reworded to read “include the definition of ‘panela’ as ‘**dried** sugarcane juice’...”

With respect to section 2.2.2 which describes a “granulated” style of panela, we question inclusion of this form. It is our understanding that the identifying characteristic of panela, jaggery, gur, raspadura, etc., is that they are typically presented in the form of a moist, formed mass. The process to make a granulated product is completely different than that to produce a firm moist mass from evaporation of cane juice as described in the definition. Granulated panela is far from that definition. We suggest that Colombia should clarify how common the granulated product is. Absent significant international trade in this product, we suggest removing the granulated form from the definition.

With respect to Section 2.2.3 which describes “Other forms of presentation, this provision which permits “any other presentation of the product,” would appear to be unnecessary.

The subheadings in this section are unnecessary because they do not add anything that is not already inherent in a Codex standard.

With respect to Section 2.2 which defines “Forms of presentation”, since the product definition in section 2.1 already specifies that panela is defined as the product “in any form or presentation...” and since there are questions about the value or usefulness of the various subcategories in this section as noted in comments 3 and 4 above, we suggest that Section 2.2 defining forms of presentation is unnecessary, does not add anything to the standard, and should be deleted in its entirety.

With respect to Section 3.2.1 which defines color, saying that it exists in “various colors” is misleading and could be confusing. The color of panela will always be in the range of light to dark brown or golden brown. We suggest that instead, the standard could say that:

3.2.1 Colour

Panela ~~may exist in various colours~~, is light to dark brown or golden brown in color depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process

Additionally, Colombia may wish to consider specifying an ICUMSA color range or a minimum color based on ICUMSA units.

With respect to Section 3.2.2 which defines flavor and aroma, we would expect the flavor and aroma of panela to be the natural, characterizing flavor of the underlying sugarcane juice without bad tastes caused by deterioration or absorption of foreign substances or any undesirable odors. We question how common flavored and aromatized panela actually is and the need to include it in the definition. We suggest not including it in the definition.

With respect to Section 3.2.4 which defines Physical and chemical characteristics, in Table 1, the term “Ashes” should be changed to “Ash”.

With respect to Section 3.2.4 which defines Physical and chemical characteristics, Table 1 specifies that for “Colorants” that there is an “Absence”. This is clearly incorrect because panela is characterized by a light to dark brown or golden brown in color due to the natural colorants. We suggest that the standard could be revised to indicate the “absence of **added** colorants” or that colorants are the ones naturally produced in processing. Additionally, the standard could specify an ICUMSA color range, or a minimum color based on ICUMSA units.

With respect to Section 3.2.4 which defines physical and chemical characteristics, Table 1 specifies that for Potassium, Calcium, Phosphorous, and Iron, there are no maximum amounts. We question the absence of maximum levels because if these elements (especially iron) are present at excessive levels, they will unfavorably impact the taste. We also question the source and importance of the minimum values specified in this table.

With respect to Section 3.2.4 which defines physical and chemical characteristics for granulated panela in Table 2, we suggest that this table be deleted, in addition to deleting the definition of granulated panela as a form of presentation.

With respect to Section 4.2 which defines anticaking agents for granulated panela, we suggest deleting this section in addition to deleting the definition of granulated panela as a form of presentation.

With respect to Section 4.3 which permits flavorings and food grade colorants for granulated panela, we specifically note that this provision is contrary to proposed Table 1 and Table 2 in that no added colorants are permitted in these tables. We also question whether adding flavorings is a common practice and note that some products such as gur, jaggery and kokuto are renowned for their “natural” composition. We suggest deleting this section in addition to deleting the definition of granulated panela as a form of presentation and in addition to deleting flavored and aromatized panela as a permitted “flavor and aroma” in section 3.2.2.

With respect to Section 7.1.1 we question the requirement that the name “panela” appear first on all of these unique products.

With respect to Section 7.1.2, 7.1.3, and 7.1.4 we suggest deleting these sections as outlined above.

With respect to Section 8 which specifies Methods of Analysis and Sampling, we question why ICUMSA methods are not used? Most of the sugar methods in the Codex Recommended Methods of Analysis and Sampling [Codex Stan 234-1999] are ICUMSA standards. ICUMSA standards are routinely updated and modernized. For example, for ash determinations, ICUMSA uses a conductimetric method, which is rapid and relatively easy as compared to the AOAC 900.02 gravimetry method specified here which is outdated and requires hours of time, very high temps, and special equipment. We recommend that whenever possible, ICUMSA methods of analysis should be used.

CEFS (COMITÉ EUROPÉEN DES FABRICANTS DE SUCRE)

In response to Codex document CL 2001/25-CS CEFS (Comité Européen des Fabricants de Sucre), on behalf of all European sugar producers, would like to provide comments on the PROPOSED DRAFT CODEX STANDARD FOR PANELA.

CEFS notes the decision of the 34th Session of the Codex Alimentarius Commission (CAC) to approve the elaboration of a worldwide STANDARD FOR PANELA as new work for the Codex Committee on Sugars (CCS). CCS will be working by correspondence only, following the uniform procedure for the elaboration of Codex standards and related texts as laid down in the Codex procedural manual. Whilst on this basis, CEFS would not oppose the establishment of a worldwide STANDARD FOR PANELA, CEFS does not support the inclusion of PANELA in subcategory 11.1.3. of the Codex Food Categorization System as laid down in the General Standard for Food Additives (GSFA). We thus explain below our reasoning and respectfully suggest considering an alternative option.

Food subcategory 11.1.3 of the GSFA (*soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar*) exclusively contains sugars covered by the Codex Standard for Sugars (Codex Stan 212-1999 (amended 2001)). Their technological need for the use of food additives is limited. According to the corresponding additive provisions laid down in the Codex Standard for Sugars and the GSFA, the only food additive authorized for use in Food Category 11.1.3. (*soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar*) is sulphites at a maximum level of 20 mg/kg, calculated as SO₂. However, as suggested in CL 2001/25-CS, PANELA seems to have substantially different technological needs for the use of food additives, especially with respect to the use of colours, acidity regulators, anticaking agents and flavourings.

Given the fact that according to the proposed DRAFT CODEX STANDARD FOR PANELA, a large number of food additives seem technologically required for this product, CEFS would see it more appropriate to align the product PANELA with the Food Category 11.4 (*other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)*), as most of the food additives suggested in chapter 4 of the PROPOSED DRAFT STANDARD FOR PANELA are already authorised (or included in the Codex step procedure) for use in Food Category 11.4.

In addition to what is stated above, CEFS has the following comments on individual sections of the PROPOSED DRAFT CODEX STANDARD FOR PANELA.

Comments on section 2.1 (PRODUCT DEFINITION)

CEFS suggests clarifying the product definition proposed for PANELA. As currently drafted, the product definition leaves doubt on whether PANELA is merely dried sugarcane juice or whether other additional characteristic ingredients are added in order for the product PANELA to be complete (e.g., food colours, flavourings, etc.). If such other ingredients were indeed part of PANELA, this fact should be covered by the product definition in order to avoid potential confusion with sugars of the Codex Standard for Sugars, which do not contain such ingredients. In view of this, it might also be considered whether PANELA really belongs to Food Category 11 ("sweeteners, including honey") or would better fit in Food Category 5.0 ("confectionery").

Moreover, the mention in the definition of saccharose, glucose, fructose and minerals as being "constituent elements" is not clear. Indeed, since in section 3.2.4 on the physical and chemical characteristics for PANELA, a maximum content for non-reducing sugars and minimum contents for minerals (but also reducing sugars and proteins) are set, it would be relevant for the product definition to include information on whether minerals (but also reducing sugars and proteins) may be added to PANELA and whether reducing sugars may be intentionally generated by hydrolysis to meet the physical-chemical requirements of PANELA laid down in section 3.2.4.

Comment on subsection 2.2.3 (OTHER FORMS OF PRESENTATION)

CEFS questions the need to include the proposed subsection 2.2.3 on other forms of presentation in the standard, as this subsection is not clear and seem to unjustifiably broaden the scope of the PROPOSED DRAFT STANDARD FOR PANELA. Indeed, as it is CEFS' understanding that PANELA can only come in solid (incl. granulated) form, providing for additional potential forms of presentation seems unnecessary.

Comment on section 4 (FOOD ADDITIVES)

Phosphoric acid (INS 338) is not included in Table 3 of the GSFA (which gathers the additives that can be used in food in accordance with GMP). The maximum use level for phosphoric acid (subsection 4.1) should therefore be expressed as a numeric value.

Comment on section 8 (METHODS OF ANALYSIS AND SAMPLING)

CEFS would like to suggest the fact that, if available, ICUMSA (International Commission for Uniform Methods of Sugar Analysis) methods may be more suitable methods to perform the analyses of the components mentioned in table of section 8.

WORLD SUGAR RESEARCH ORGANISATION (WSRO)

The initial observation would be that a full standard definition of Panela should be agreed before its inclusion in the GSFA can be considered. Once a definition has been agreed, then the best method of incorporating it into the GSFA can be discussed.