

# 食品法典委员会



联合国粮食及  
农业组织



世界卫生组织

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议题 9

CX/ASIA 22/22/9

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## 联合国粮农组织/世卫组织联合食品标准计划

### 粮农组织/世卫组织亚洲协调委员会

#### 第二十二届会议

线上会议 2022年10月12、13、14、17、18和21日

### 植物叶片包裹熟制米饭拟议区域标准草案

(步骤4)

(由中国主持的电子工作组编写)

希望在步骤3就拟议草案（附录I）提出意见的食典委成员和观察员应按照 CL 2022/54/OCS-ASIA号文件（载于食典网页/2022系列通函）中的说明提交反馈意见。

## 引言

1. 在 2016 年 9 月举行的亚洲协调委第二十届会议<sup>1</sup>上，中国介绍了粽子的讨论文件/项目文件，许多国家表达了兴趣。会议要求中国修改该讨论文件/项目文件，供第二十一届会议审议。应第二十届会议的要求，中国做出了以下修改：

- (i) 提供了关于粽子的品种、其标准化可行性、食品安全关切以及贸易障碍的补充信息；
- (ii) 提供了《确定工作重点的标准》所要求的所有信息；
- (iii) 对表1中提供的泰国类似产品的图片和描述进行了修订；
- (iv) 对产品定义做了一些修改。

2. 在 2019 年 9 月举行的第二十一届会议<sup>2</sup>上，中国进一步解释说，“粽子”是传统名称，在确定更通用的名称之前，可暂时使用这一名称，并欢迎这方面的所有建议。会议审议

<sup>1</sup>REP17/ASIA，第118段

<sup>2</sup>REP20/ASIA，第104-112段

了关于产品名称的不同建议，即“植物叶片包裹蒸熟米饭”、“粽子”、“植物叶片包裹蒸熟糯米”和“植物叶片包裹蒸熟糯米”。

3. 会议指出：(i) 该产品的制备方法不限于蒸，包括煮在内的其他方法也可以接受；(ii) 除了糯米，本标准还应该包括其他类型的米。

4. 会议同意将该产品更名为“植物叶片包裹熟制米饭”。

5. 2020年9月至11月在线上举行的食典委第四十三届会议<sup>3</sup>批准了关于制定植物叶片包裹熟制米饭区域标准的新工作（工作编号：N04-2020）建议。

6. 为推动项目取得进展，成立了由中国主持的植物叶片包裹熟制米饭电子工作组。工作组的工作语言为英语，以书信方式（电子邮件）开展了工作。

### 电子工作组的目标

7. 电子工作组的目标是编写拟议的标准草案，以便在步骤3进行分发，以征求意见，并供第二十二届会议审议。

### 与会情况

8. 2020年12月，向食典委成员和观察员发出了参加电子工作组邀请。日本、韩国、印度尼西亚、泰国、美国和国际冷冻食品协会登记参加了电子工作组（参与者名单见附录II）。电子工作组主席还通过食典委秘书处和中国联络点向各成员发出了邀请函，以鼓励更广泛的参与，特别是那些也生产和消费同类产品的国家和地区。

### 意见和磋商

9. 中国编写了本标准的第一份草案，并进行了两轮意见征求活动。第一轮于2021年5月开始。一些成员表示，受2019冠状病毒病（COVID-19）疫情影响，很难与行业代表举行线下会议，并要求推迟意见提交时间。对此，电子工作组主席同意推迟提交意见的截止日期。在第一轮中，日本、韩国、泰国和美国提交了反馈意见。第二轮于2022年2月启动，收到了日本、韩国、泰国和美国的反馈意见。

### 关于标准草案的讨论

10. 按条款和/或子条款的顺序建立了完整的意见反馈模板（第一轮收到的反馈意见载于附录III；第二轮收到的意见载于附录IV）。每条意见都得到了仔细审议，模板中还列出了主席的建议。所有意见已反映在草案中，特别是关于产品定义、类型、质量标准、食品添加剂等方面。同时，还反映了成员建议的文字修改和对英文措辞的说明。

#### 2.1 产品定义

11. 本标准草案的规定较为包容灵活，可供纳入本区域的类似产品。据悉，在韩国销售的许多产品（荷叶饭）在包装过程中未捆扎；在韩国生产的最终产品也未捆扎或用绳

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<sup>3</sup> REP20/CAC，第57段和附录V

子捆绑，而是用植物叶片包裹。考虑到应灵活涵盖类似的产品，对产品定义进行了相应的修改。

### 2.3 过程定义

12. 由于冷冻过程对本标准很重要，因此增加了第2.3.3节（速冻过程），以完善冷冻过程的信息，这也与其他食典标准一致。

## 3 基本配料和质量因素

13. 为了涵盖更多配料，例如产品所用的叶片和大米，并遵循《食品和动物饲料分类》（CXA 4-1989）中使用的术语，对标准草案进行了修订。有一个国家建议，在这部分需要尽可能参考现行食典标准。根据其他食典标准的格式，在基本配料部分未参考现行食典标准；根据商品标准的一般格式，也没有必要参考。

### 3.2 质量标准

14. 原文已重新安排为3.2.1（一般要求）和3.2.2（缺陷及允许量）。根据美国和泰国的建议，删除了水分要求，因为这种产品经过了灭菌和冷冻处理，所以没有必要规定水分含量。

## 4. 食品添加剂

15. 本节需要参考《食品添加剂通用标准》（CXS 192-1995）、食品类别和表I、II或III。若提供食品添加剂的处方列表，则可能会限制创新并形成贸易壁垒。美国建议笼统提及《食品添加剂通用标准》，以便在使用食品添加剂方面留出更大的余地；此外，若某些食品添加剂被取消在本产品中使用的认证，或新的食品添加剂获得了认证，则不必修订本标准。泰国还建议修改这句话，与其他食典标准保持一致。有鉴于此，草案只笼统提及了《食品添加剂通用标准》，以取代规约性的食品添加剂列表。

## 8. 标签

16. 增加了关于非零售容器的内容，因为《非零售食品容器标签通用标准》（CXS 346-2021）已获得通过。

### 8.1 产品名称

17. 草案以脚注的形式增加了亚洲国家使用的其他名称，如粽子、茅卷、Ba-Jang、Khao Tom Mat、荷叶饭、Ketupat、Ma-chang等。由于产品的馅料差异很大，包括各种肉类、蔬菜、海鲜、蘑菇，乃至水果；在不同国家也迥然不同，在一国的不同地区也存在巨大差异，所以很难用“含[馅料名称]熟制米饭”来命名该产品。本标准中未具体规定“食用方法”，因为《预包装食品标签通用标准》（CXS 1-1985）中规定了详细的储存和使用说明。

## 9. 分析和抽样方法

18. 增加了提取油脂的方法，以便与其他食典标准保持一致，例如《方便面标准》（CXS 249-2006）。

## **结论和建议**

19. 鉴于几乎所有提交的意见都得到了适当的讨论，可将植物叶片包裹熟制米饭标准拟议草案提交亚洲协调委员会第二十二届会议，供在步骤4审议。请第二十二届会议审议拟议标准草案（见附录I），以便通过食典步骤程序加以推进。

## 植物叶片包裹熟制米饭拟议区域标准草案

### 1. 范围

本标准适用于第2节中定义的用于直接消费的产品。

### 2. 产品说明

#### 2.1 产品定义

植物叶片包裹熟制米饭由大米制成，可添加或不添加肉类、家禽、蛋、水果和蔬菜、豆类、坚果及其衍生产品等作为馅料，馅料完全用植物叶片（箬叶、芦苇叶、香蕉叶、荷叶等）包裹。在蒸或煮和包装之前，产品可以捆扎，也可以不捆扎。

#### 2.2 产品类型

##### 2.2.1 速冻产品

指经蒸/煮后速冻并以冷冻温度储存的产品。

##### 2.2.2 商业灭菌产品

指经过灭菌处理以满足商业无菌要求的产品。

#### 2.3 过程定义

##### 2.3.1 植物叶片

第2.1节所述植物叶片在使用前应仔细挑选、浸泡、清洗和沥干。不得将叶片浸泡在化学试剂中以改变其颜色。

##### 2.3.2 烹饪

产品可使用蒸汽和其他适当的烹饪方法和/或在一定的压力、温度和时间下进行烹饪，然后再速冻。

##### 2.3.3 速冻过程

速冻产品（第2.2.1节）是指经过《速冻食品加工和处理操作规范》（CXS 8 - 1976）所述流程冷冻的产品。特别应指出的是，这种冷冻操作应以快速通过最低结晶温度范围的方式进行。速冻过程只有在产品热稳定后热中心温度达到或低于-18摄氏度时方可视为完成。可允许在控温条件下对速冻产品采用重新包装的公认做法。

##### 2.3.4 真空包装

第2.2.2节所述的商业灭菌产品应以适当方式进行加工，加工之前或之后以容器密封保存，以防止变质并确保正常室温储存条件下的产品稳定性。灭菌后的产品不应泄漏或膨胀。

### 3. 基本配料和质量因素

#### 3.1 配料

##### 3.1.1 基本配料

- a) 糯米、大米、小米、燕麦、大麦等
- b) 植物叶片

##### 3.1.2 可选配料

- a) 水果和蔬菜（包括可食用真菌、豆类和豆类蔬菜）
- b) 坚果和种子
- c) 腌制水果
- d) 可食用真菌
- e) 肉类
- f) 水产品
- g) 鸡蛋
- h) 食用脂肪和油
- i) 豆类
- j) a) 至i) 的衍生产品
- k) 糖
- l) 食用盐
- m) 香料和烹饪用药材
- n) 调味品
- O) 酌情选用其他配料

#### 3.2 质量标准

##### 3.2.1 质量要素

含有动物源和坚果类馅料的产品应满足过氧化值 $\leq 19.7\text{mEq/kg}$ 的要求。

##### 3.2.2 一般要求

植物叶片包裹熟制米饭应具有以下特点：

- 呈适当形状；
- 大小一致；

- 包裹得当；
- 具有基本配料和/或可选配料的特有气味和味道。

### 3.2.3 缺陷及允许量

植物叶片包裹熟制米饭应基本没有以下缺陷：

- 叶片破损和馅料渗漏；
- 异味；
- 产品外部和内部存在可见的异物。

### 3.3 “次品”分类

任何没有达到第3.2节所述质量要求的容器均视为“次品”。

### 3.4 批次验收

满足以下条件时，可以认为此批次产品符合本标准规定：

- 如第3.3节定义的“次品”数量不超过可接收质量水平为6.5的适当抽样方案的合格判定数(c)，则该批次将视为可接收产品。
- 如第7.1.1节定义的“次品”数量不超过可接收质量水平为6.5的适当抽样方案的合格判定数(c)，则该批次将视为可接收产品。

## 4. 食品添加剂

按照《食品添加剂通用标准》（CXS 192-1995）表1和表2规定用于食品类别06.7“预熟制或加工的大米制品，包括米糕（仅限东方食品）”的酸度调节剂、抗氧化剂、色素、防腐剂和稳定剂，以及《食品添加剂通用标准》（CXS 192-1995）表3所列的某些酸度调节剂、抗氧化剂、色素、防腐剂、稳定剂、乳化剂、增味剂和增稠剂，可用于符合本标准的食品。

## 5. 污染物

5.1 本标准所涉产品应符合《食品及饲料中污染物和毒素法典通用标准》（CXS 193-1995）中的最大限量规定。

5.2 本标准涵盖的产品应符合食品法典委员会制定的农药残留最大限量的规定。

## 6. 卫生

6.1 建议本标准所涉产品在制备和处理时需遵守《食品卫生通用原则》（CXC 1-1969）中相关章节的具体规定，以及食品法典委员会推荐的与本产品相关的其他行为准则。

6.2 产品应符合依据《食品微生物标准制定和应用原则与准则》（CXG 21-1997）制定的微生物标准。

6.3 速冻产品应符合《速冻食品加工和处理操作规范》（CXC 8-1976）。

6.4 商业灭菌产品应符合商业无菌的要求。

## 7. 重量和计量

### 7.1 净重

本标准规定所涉产品应按照《预包装食品标签通用标准》（CXS 1-1985）标示产品重量。

#### 7.1.1“次品”分类

未能达到标签所示净重的产品均视为“次品”。

## 8. 标签

本标准规定所涉产品应按照《预包装食品标签通用标准》（CXS 1-1985）加贴标签。非零售容器的标签应符合《非零售食品容器标签通用标准》（CXS 346-2021）。此外，还适用以下具体规定：

### 8.1 产品名称

产品名称为“植物叶片包裹熟制米饭”。产品应贴上第2.2节所述的相应名称。根据产品销售国的法律和习惯，在不误导消费者的情况下，可以使用其他名称<sup>4</sup>。

## 9. 分析和抽样方法

为了核查是否符合本标准，应采用与本标准规定有关的《分析和采样建议方法》（CXS 234-1999）中包含的分析和采样方法。

### 9.1 过氧化值的测定<sup>5</sup>

#### 9.1.1 从产品中提取油脂

##### 9.1.1.1 仪器

(a) 旋转式蒸发器

(b) 水浴槽

##### 9.1.1.2 提取

移除产品包装和植物叶片等，取出代表性样品的可食用部分，粉碎后放入均质机或玻璃研钵中，不断研磨，直至样品充分捣碎，混合均匀，然后倒入广口瓶中，加入样品2~3倍量的石油醚（沸程：30°C~60°C）。充分混合后，塞住瓶口，放置12小时以上。用装有无水硫酸钠的漏斗将所有溶液过滤到圆底烧瓶中。用石油醚冲洗广口瓶中的

<sup>4</sup> 其他名称包括：粽子、茅卷、Ba-Jang、Khao Tom Mat、荷叶饭、Ketupat、Ma-chang等。

<sup>5</sup> 第9.1节将由分析和采样方法法典委员会审议，最终公布的标准将删除该节。



残留物。若滤液不够清澈，则用新的无水硫酸钠漏斗重复过滤一次。以40°C以下的温度，在旋转蒸发器上减压蒸发圆底烧瓶中的石油醚，残留物即测试样品。应选择足够数量的代表性样品，以确保能得到不少于8克的测试样品。测试样品应尽快进行测试。

### **9.1.2 测定**

参照ISO 3960或AOCS Cd 8b-90 (03)。

## EWG on Regional Standard for Cooked Rice Wrapped in Plant Leaves

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**Template for comments and recommendations from the EWG chair The 1<sup>st</sup> round for *Cooked Rice Wrapped in Plant Leaves***

*in the order of clause/subclause*

No.	Country	Clause/ Subclause	Comments	Proposed change	Recommendations from chair
1	The Republic of Korea	2.1 Product definition	Many products distributed in the Republic of Korea (lotus leaves rice) are not bundled up in the packaging process. Moreover, lotus leaves rice could be heated before wrapping process.	The product is prepared from rice especially glutinous rice, adding or not adding meat, poultry, eggs, fruits and vegetables and their derived products, beans, nuts, etc. as the filling that should be <b>completely</b> wrapped with plant leaves. The product <b>should may/may not</b> be bundled up before steaming or boiling, and packaging.	Noted and carefully discussed.  Similar products in other Asian countries are mostly wrapped and bundled up to prevent the loosing plant leaves deforming the product during bundling process. Complete wrapping and bundling process secure food safety for this product. Lotus leaf rice does not fall into the product specified in this standard.
2	Thailand	2.1 Product definition	The product definition should include examples of plant leaves.	The product is prepared from rice especially glutinous rice, adding or not adding meat, poultry, eggs, fruits and vegetables and their derived products, beans, nuts, etc. as the filling that should be completely wrapped with plant leaves (indocalamus leaves, reed leaves, banana leaves, lotus leaves, and etc.). The product should be bundled up before steaming or boiling, and packaging.	Accepted and revised.
3	Thailand	2.2	The products from different processes are not “product classification”. The words “product types” should be used instead.	<b>2.2 Product types</b>	Accepted and revised.
4	Thailand	2.2	To provide inclusiveness, flexibility, and practicality to food business operators. The processing technologies should not be limited to	2.2.1 <b>Frozen product</b>  The products that are quickly frozen and kept frozen.  2.2.2 <b>Commercial sterilized product</b>	For 2.2.1: Noted and considered  There is no code practice for processing and handling “frozen products” which is difficult to define, while quick-frozen product can comply

			only quick-frozen or vacuum packaged products.	The products that are sterilized to meet the requirements of commercial sterility.	with the <i>Code of Practice for the Processing and Handling of Quick Frozen Foods (CXC 8-1976)</i> . There are a large number of quick-frozen type of products, therefore it is necessary to keep this type.  For 2.2.2: has been revised.
5	The Republic of Korea	2.2.1	<p>The Republic of Korea would like to suggest to delete 'Quick' because Quick frozen cooked rice wrapped in plant leaves are not manufactured much in the Republic of Korea according to the result of research on distributed products. Since quick freezing process is related to the quality, not the safety, of the product, it is not necessary.</p> <p>The presented product classification in the draft is not clear because it includes both aspects of the distribution process (2.2.1) and packaging (2.2.2). Therefore product classification should be re-established based on the same criteria(e.g. frozen product / non-frozen product).</p> <p>Please consider that the lotus leaves rice products distributed in Korea could be packaged by normal package (PE package including or not including plastic tray, not sterilized and not vacuum packaged).</p>	<p><b>2.2 Product classification</b></p> <p>[2.2.1 Quick-frozen product]</p> <p>[The products that are steamed or cooked before quickly frozen and stored in freezing temperature.]</p>	See comment NO.4
6	Thailand	2.3	Detail in Sections 2.3.2 and 2.3.3 are already stated in Section 2.1 Product definition.	<p><b>2.3 Process definition</b></p> <p>2.3.1 The plant leaves should be carefully selected, soaked, cleaned and drained before using. The leaves shall not be soaked by chemical reagents to enhance their color.</p>	Accepted and revised.

				<p>2.3.4 The freezing process shall not be regarded as complete unless and until the temperature of frozen product as described in Section 2.2.1 has reached -18°C at the thermal center.</p> <p>2.3.5 The commercial sterilized product as described in Section 2.2.2 should not leak or swell after sterilization.</p>	
7	The Republic of Korea	2.3.2	<del>completely, before bundled up.</del>	2.3.2 The rice and fillings should be <del>completely</del> -wrapped by plant leaves- <del>before bundled up.</del>	See Comment NO.1
8	The Republic of Korea	2.3.3	The meaning of 'different heating methods' is unclear.	2.3.3 The products should be steamed or boiled <del>with different heating methods</del> under certain pressure, temperature and time.	Accepted and revised
9	The Republic of Korea	2.3.4	2.3.4 The Republic of Korea proposes to delete 'Quick' because Quick frozen cooked rice wrapped in plant leaves are not manufactured much in the Republic of Korea according to the result of research on distributed products. Also this provision shall be discussed after '2.2 Product classification' is clearly established.	<del>2.3.4 The quick-freezing process shall not be regarded as complete unless and until the temperature of quick-frozen product as described in Section 2.2.1 has reached -18°C at the thermal center.]</del>	See comment NO.4
10	The Republic of Korea	2.3.5	2.3.5 This provision shall be discussed after 'Product classification' is clearly established.	<p><del>2.3.5 The vacuum-packaged product as described in Section 2.2.2 should not leak or swell after vacuum sterilizing.</del></p> <p>2.3.5 The commercial sterilized product as described in Section 2.2.2 should not leak or swell after sterilization.</p>	Accepted and revised.
11	Thailand	3.1	For "a)", examples of plant leaves are not an ingredient, it should be moved to Section 2.1 Product definition. The other amendments are for editorial purpose.	<p><b>3.1 Basic ingredients</b></p> <p>The ingredients include but are not limited to:</p>	Accepted and revised.

				<ul style="list-style-type: none"> <li>b) glutinous rice, rice, millet, and etc.;</li> <li>c) water;</li> <li>d) fruits and vegetables;</li> <li>e) nuts;</li> <li>f) preserved fruits;</li> <li>g) edible fungi;</li> <li>h) meat i) aquatic products;</li> <li>j) eggs</li> <li>k) edible fat and vegetable oil;</li> <li>l) beans</li> <li>m) derived products of d) – l)</li> <li>n) sugar;</li> <li>o) edible salt;</li> <li>p) spices and seasonings;</li> <li>q) other ingredients as appropriate;</li> </ul>	
12	The Republic of Korea	3.1、 3.2	For ensuring consistency with other commodity standards, two types of ingredients need to be listed: basic ingredients and optional ingredients.	<p><b>3.1 Basic ingredients</b></p> <p><del>The ingredients include but are not limited to:</del></p> <ul style="list-style-type: none"> <li>a) indocalamus leaves, reed leaves, banana leaves, lotus leaves, <del>and/or</del> etc.;</li> <li>b) glutinous rice, rice, millet, <del>oat, barley and/or</del> etc.;</li> <li>c) water;</li> </ul> <p><b>3.2 Optional ingredients</b></p> <ul style="list-style-type: none"> <li><del>d</del>a) fruits and vegetables;</li> <li><del>e</del>b) nuts;</li> <li><del>f</del>c) preserved fruits;</li> </ul>	Accepted and revised accordingly.

				<p>g) edible fungi;</p> <p>h) meat and derived products;</p> <p>i) aquatic products;</p> <p>j) eggs and derived products;</p> <p>k) vegetable oil;</p> <p>l) sugar;</p> <p>m) edible salt;</p> <p>n) spices and seasonings;</p> <p>o) edible oil and fat products;</p> <p>p) soybeans and derived products;</p> <p>q) other ingredients as appropriate;</p>	
13	Thailand	3.2	<p>We would like to ask for a clarification of the issues as follows:</p> <p>1) What does it mean by the words “visible foreign bodies”? Also, please provide some examples.</p> <p>What is the basis or justification of the peroxide value? If the Peroxide value is one of quality criteria, the method of analysis of peroxide value should be included in Section 9. Methods of analysis and sampling.</p>		<p>“visible foreign bodies” refers to “visible foreign matter”</p> <p>Peroxide value is the most commonly used assay for measuring the state of oxidation in fats and oils and its value measures the oxidative rancidity or degree of oxidation of the fat/oil.</p> <p>Because some fillings contain meat and meat products, nuts and other oil-riching ingredients, it is necessary to measure the peroxide value.</p>
14	The Republic of Korea	3.2.1	<p>It is considered that moisture content is appropriate as a quality factor for cooked rice wrapped in plant leaves. To set detailed value, further discussion is needed.</p> <p>Republic of Korea believes that peroxide value can be used to determine about degree of freshness for ingredients such as animal derived</p>	<p>3.2.1 Quality Factors</p> <p>(a) Moisture --%</p> <p>(b) Peroxide value <math>\leq 0.25</math> g/100 g (limited to products with animal derived fillings or nuts as major ingredients)</p> <p>3.2.2 The products specified in this standard should have their appropriate</p>	<p>Accepted and added.</p> <p><b>The value of moisture content has been added. Further discussion is needed and your opinions are sincerely welcomed.</b></p> <p>Peroxide value is the most commonly used assay for measuring the state of</p>




			<p>fillings or nuts. However, the peroxide values of lipids extracts from rice bran and animal derived fillings or nuts can be determined at the same time. Therefore, it is difficult to determine of the freshness of animal derived fillings or nuts. The scientific basis needs to be provided to determine the peroxide value.</p>	<p>shape, be uniform in size, be wrapped and free from leakage, have the smell and taste of the product, be free from foreign taste, and be free from visible foreign matters outside and inside the product.</p>	<p>oxidation in fats and oils and its value measures the oxidative rancidity or degree of oxidation of the fat/oil.</p> <p>Because some fillings contain meat and meat products, nuts and other oil-riching ingredients, it is necessary to measure the peroxide value.</p>
15	Thailand	4	<p>According to the General Standard for Food Additives (CXS 192-1995), Aspartame is not allowed to use with food category 16.0 Prepared foods. Also, we would like to propose China to reconsider the usage of this food additive in order to be in line with the CXS 192-1995.</p>		Accepted and deleted.
16	The Republic of Korea	6 Hygiene	<p>References to quick frozen products and vacuum packaged products shall not be specified in the draft until 'Product classification' is clearly established.</p> <p>[Quick-frozen product should comply with the <i>Code of Practice for the Processing and Handling of Quick Frozen Foods (CXC 8-1976)</i>]</p> <p>[Vacuum-packaged products should meet the requirements of commercial sterility.]</p>		<p>Noted</p> <p>See Comment NO.4</p>
17	Thailand	8.2、 8.3	<p>We would like to propose the deletion of "Section 8.2 Storage" and "Sections 8.3 Other" since the detail about instruction of storage and edible method are in the <i>General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)</i>.</p>		Accepted

18	The Republic of Korea	<b>9 Methods of Analysis and Sampling</b>	When 'Quality factor' for cooked rice wrapped in plant leaves is established, appropriate methods of analysis needs to be specified.		Accepted
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**Template for comments and recommendations from the EWG chair The 2<sup>nd</sup> round for *Cooked Rice Wrapped in Plant Leaves***  
*in the order of clause/subclause*

No.	Country	Clause	Comments	Proposed change	Recommendations from chair
1	Thailand	2.1 Product definition	<u>Cooked Rice Wrapped in Plant Leaves</u> The product is prepared from rice especially glutinous rice, .....	<u>Cooked Rice Wrapped in Plant Leaves</u> The product is prepared from rice especially glutinous rice, .....	Accepted. The text has been amended accordingly.
2	US	2.1 Product definition	<u>Issue &amp; Rationale:</u> The word “especially” is confusing. If only glutinous rice is used, then it should be clear. This section also needs to clarify that the cooked rice grains are pressed together to functions as a dough with or without fillings etc.	<u>Proposal:</u> The product is prepared from cooked or semi-cooked glutinous rice pressed together with or without fillings of meat, poultry, eggs, fruits, vegetables, beans, nuts and their derived products. When fillings are used, they must be completely wrapped in the glutenous rice. The product should be completely wrapped with plant leaves and bundled up before cooking and packaging.	Accepted. “especially” has been deleted as this may be confusing.
3	The Republic of Korea	2.1 Product definition	The product <b>should</b> be bundled up before steaming or boiling, and packaging.  [Rationale] Many products manufactured in Korea are wrapped with plant leaves after steaming or boiling. Furthermore, final products manufactured in Korea are not bundled up or tied up with string but wrapped with plant leaves. Main point of CCASIA to include similar products in the region should be taken into account in developing CODEX standards.  In addition, we would like Chair of eWG to provide detailed definition of “completely wrapped” and “bundled up”.	The product <b>may</b> be bundled up before steaming or boiling, and packaging.	Considering that many final products manufactured in Korea are not bundled up or tied up with string but wrapped with plant leaves and considering that similar products should be taken into account, the word “should” has been amended to “may/may not” to make the standard more inclusive.

					 <p>Photo 1      Photo 2</p> <p>Photo 3      Photo 4</p> <p>Photo 3 and 4 are an example of completely wrapped, which means that the rice and fillings are totally wrapped into the plant leaves. "Bundled up" means that the wrapped product be tied up by a string, cotton thread and etc.</p>
4	US	2.2 Product Types	<p><u>Issue &amp; Rationale:</u> The product types should be defined.</p>	<p><u>Proposal:</u></p> <p><b>2.2 Types</b></p> <p><b>2.2.1</b> Cooked Rice Wrapped in Plant Leaves are of the following styles</p> <p><b>2.2.1.1</b> Partially cooked- This product is partially cooked with or without fillings and needs to complete cooking before consumption.</p> <p><b>2.1.1.2 Fully</b> cooked -This product that is fully cooked with or without fillings and only needs to be reheated before consumption.</p>	<p>The product type here is defined by processing technology into quick frozen product and commercial sterilized product. This proposed types make it difficult to define the process definition, and quality criteria. Considering this proposed classification of product types is irrelevant, it is decided to retain the original text.</p>
5	Thailand	2.3 Process definition	<p>Rationale: The addition is to complete the information on quick-freezing and commercial sterilized processes which are important for Cooked Rice Wrapped in Plant Leaves. Also, the proposed text</p>	<p><u>2.3.4 The quick-freezing product as described in Section 2.2.1 is the product subject to a freezing process in appropriate equipment and complying with the conditions laid down hereafter. This freezing operation shall be carried out in such a way</u></p>	<p>Accepted. The text has been amended accordingly.</p>

			<p>is in line with the Standard for Quick Frozen Vegetables (CXS 320-2015) and Standard for Certain Canned Fruits (CXS 319-2015).</p>	<p><u>that the range of temperature of maximum crystallization is passed quickly. The quick freezing process shall not be regarded as complete unless and until the product temperature has reached – 18°C at the thermal centre after thermal stabilization. The recognized practice of repacking quick frozen products under temperature controlled conditions is permitted.</u></p> <p><u>2.3.5 The commercial sterilized product as described in Section 2.2.2 shall be processed in an appropriate manner, before or after being sealed in a container, so as to prevent spoilage and to ensure product stability in normal storage conditions at ambient temperature. The product shall not leak or swell after sterilization.</u></p>	
6	US	2.2&2.3	<p><u>Issue &amp; Rationale:</u></p> <p>The current text in section 2.2 Product Types belong to Section 2.3 Process Definition therefore the text is moved there.</p>	<p><u>Proposal:</u></p> <p><b>2.3 General Requirements</b></p> <p><b>2.3.1 Wrapping in plant leaves</b></p> <p>The plant leaves as described in Section 3.1.a should be carefully selected, soaked, cleaned and drained before using. The leaves shall not be soaked by chemical reagents to enhance their color. The rice and fillings should be completely wrapped by plant leaves before bundled up.</p> <p><b>2.3.2 Wrapping</b></p> <p>The rice with or without fillings as <u>described in Section 3.1</u> should be completely wrapped by plant leaves before being bundled up.</p> <p><b>2.3.3 Cooking and freezing</b></p> <p>The products may be <i>partially or fully cooked</i> using steam and other appropriate cooking methods <b>and/or</b> under certain pressure, temperature and time, before quickly frozen. The quick-freezing process shall not be regarded as complete until the</p>	<p>Comprehensively considering US and Thailand's comments, this part has been amended as proposed. Please refer to the draft.</p>

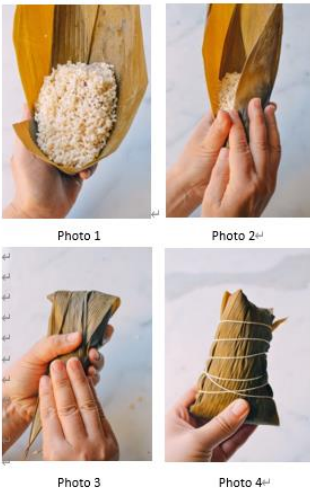
				<p>product as described in Section 2.2.1 has reached - 18°C at the thermal center.</p> <p><b>2.3.4 Vacuum Packing</b></p> <p>The products that should be vacuum-packaged and sterilized to meet the requirements of commercial sterility. The vacuum-packaged product as described in Section 2.2.2 should not leak or swell after vacuum sterilizing</p>	
7	Japan	2.3.2	The rice and fillings should be completely wrapped by plant leaves before bundled up.	The rice and fillings should be completely wrapped <b>in</b> plant leaves before bundled up.	This may not be an editorial mistake.
8	US	3 Essential composition and quality factors	<p><u>Issue &amp; Rationale:</u> This section should indicate what are the Basic/essential and the Optional ingredients. Because Cooked Rice Wrapped in Plant Leaves can be traded with or without fillings; the fillings and their derived products are optional ingredients. This section should also include references to existing Codex standard when they exist for both basic and optional ingredients.</p> <p>Salt can be a basic/essential ingredient in Cooked Rice Wrapped in Plant Leaves without fillings; however, it can be an optional ingredient in Cooked Rice Wrapped in Plant Leaves when it is not added to the rice but to the filling.</p>	<p><u>Proposal:</u></p> <p><b>3.1 Composition</b></p> <p><b>3.1.1 Basic/Essential ingredients</b></p> <p>a) indocalamus leaves, reed leaves, banana leaves, lotus leaves, and etc.</p> <p>b) semi-cooked or fully cooked glutinous rice, rice- Codex Standard for Rice (CXS 198-1995Amd.2019).</p> <p>c) water</p> <p>d) salt (Codex Standard for Food Grade Salt (CXS 150-1985) amd. 2012)</p> <p><b>3.1.2 Optional Ingredients</b></p> <p>Optional ingredients include the following and their derived products:</p> <p>a) fruits and vegetables</p> <p>b) nuts.</p> <p>c) preserved fruits</p> <p>d) edible fungi; (Codex Standard for Edible Fungi and Fungus Products (CXS 38 -1981 and in Codex Standard for Dried Edible</p>	Thank you for your kind advise on this part. According to the format of other Codex standards, no existing Codex standard is referenced in this part, and in view of the general format of the commodity standard, it is unnecessary to do so.

				<p>Fungi (CXS 39-1981))</p> <p>e) meat</p> <p>f) aquatic products</p> <p>g) eggs</p> <p>h) vegetable oil; (Codex Standard for Named Vegetable Oils (CXS 210-1999) amd. 2019)</p> <p>i) sugar; (Codex Standard for Sugar (CXS 212- 1999)amd.2019</p> <p>j) edible salt; (Codex Standard for Food Grade Salt (CXS 150-1985) amd. 2012)</p> <p>k) spices and seasonings</p> <p>l) edible oil and fat products</p> <p>m) soybeans</p> <p>n) millet, oats and barley</p> <p>o) other ingredients as appropriate</p>	
9	Thailand	3.1 Basic ingredients	<p>The item a) and c) should be deleted.</p> <p><b>Rationale:</b> Leaves and water are not ingredients of the product. Leaves are only used for wrapping. Also, water is used for soaking the rice. Normally, it is not specified as ingredient.</p>		Accepted. The item a) and c) have be deleted.
10	Thailand	3.2 Optional ingredients	<p>For a), b), m), Thailand would like to amend the text as follows:</p> <p>“a) fruits and, vegetables (<u>including edible fungi, pulses and legume vegetables</u>)</p> <p>b) nuts <u>and seeds</u></p> <p>h) edible fats <u>and vegetable oils</u></p>	<p>“a) fruits and, vegetables (<u>including edible fungi, pulses and legume vegetables</u>)</p> <p>b) nuts <u>and seeds</u></p> <p>h) edible fats <u>and vegetable oils</u></p> <p>m) spices and <u>culinary herbs</u> <del>seasonings</del></p> <p>n) <u>seasonings</u></p>	Accepted. This part has been amended accordingly.

			<p>m) spices and <u>culinary herbs seasonings</u></p> <p>n) <u>seasonings</u></p> <p><b>Rationale:</b> The amendment is to include some ingredients and follow the terms used by the Codex Classification of Foods and Animal Feeds:</p>		
11	Thailand	3.2.1 Quality factors	<p>- Thailand would like to delete a) Moisture <math>\leq 55\%</math> because it is a product that had been sterilized and frozen processed. Therefore, there is no need to determine the moisture content.</p> <p>- For b) Peroxide value <math>\leq 0.25</math> g/100 g, Thailand would like to ask for a clarification from China about the unit for Peroxide value. For our understanding, the unit related to methods of analysis stated in Section 9.1 is mEq/kg.</p>		<p>Accepted. Moisture requirement has been deleted as the product is frozen processed.</p> <p>The unit for Peroxide value has been converted into <math>\leq</math> mEq/kg for consistency.</p>
12	US	3.2.1.a Moisture	<p><u>Issue &amp; Rationale:</u> The minimum moisture of <math>\leq 55</math> is irrelevant because i). the product can be re-heated in hot water and the moisture reconstituted, and ii). Low moisture can be used to as a means of food safety and quality after productions. Therefore, it is recommended to delete the moisture requirement.</p>	Therefore, it is recommended to delete the moisture requirement.	Accepted. Moisture requirement has been deleted accordingly.
13	US	3.2.1.b Peroxide Value	<p><u>Issue &amp; Rationale:</u> Sentence structure</p> <p>Products with animal and nuts derived fillings shall meet the Peroxide value <math>\leq 0.25</math> g/100 g</p>	Products with animal and nuts derived fillings shall meet the Peroxide value $\leq 0.25$ g/100 g	Accepted. This sentence has been restructured accordingly.
14	Thailand	3.2.2	Thailand would like to propose adding subsection under Section 3.2 Quality Criteria which are 3.2.2 General requirements and 3.2.3 Defects and Allowances	<p><b>3.2.2 General requirements</b> <del>The products specified in this Standard should:</del></p> <p>Cooked rice wrapped in plant leaves should have the following qualities:</p>	Accepted. The proposed text has been added and rearranged as Thailand suggested.



				<p>—have their appropriate shape;                  —be uniform in size,                  —be properly tied,                  —be completely wrapped and free from leakage;                  —have the smell and taste of the product, free from foreign taste;                  —be free from visible foreign matters outside and inside the product.</p> <p><b>3.2.3 Defects and Allowances</b></p> <p><u>Cooked rice wrapped in plant leaves should be substantially free from following defects:</u></p> <p>— free from leakage;                  — free from foreign taste;                  — free from visible foreign matters outside and inside the product.</p>	
15	The Republic of Korea	3.2.2	<p>—be properly tied,                  In addition, the products may be properly tied.</p> <p>[Rationale]                  In Korea, final products are not bundled up or tied up with string but wrapped with plant leaves.</p> <p>We would like Chair of eWG to provide detailed definition of “completely wrapped” and “free from leakage”</p>	<p>In addition, the products may be properly tied.</p>	<p>“—be properly tied” in this part has been deleted as Section 2.1 indicates that “The product may be bundled up before steaming or boiling, and packaging.”</p> <p>As “free from leakage” may be misleading, it has been amended to “free from broken wrapper and filling leaking” to make it clear.</p>

					 <p>Photo 1      Photo 2</p> <p>Photo 3      Photo 4</p> <p>It can be seen from Photo 4 that the final product is completely wrapped without any leakage of the fillings. It is noted that in Korea, final products are not bundled up or tied up with string but wrapped with plant leaves.</p> <p>(Photos are for reference only. Source: <a href="https://thewoksoflife.com/zongzi-cantonese-style/">https://thewoksoflife.com/zongzi-cantonese-style/</a>)</p>
16	US	3.2.2	<p>3.2.2 The products specified in this Standard should:</p> <ul style="list-style-type: none"> <li>- have the smell and taste of the product, free from foreign taste.</li> </ul> <p><u>Issue &amp; Rationale:</u> It is recommended to revise this requirement that takes into consideration both the Basic essential composition and optional ingredients.</p>	<p><u>Proposal:</u></p> <ul style="list-style-type: none"> <li>- have the characteristic smell and taste of the Basic/essential and/or optional ingredients and free from foreign smell and taste</li> </ul>	<p>Accepted. The text has been amended accordingly.</p>
17	US	<b>4 Food additives</b>	<p><u>Issue &amp; Rationale:</u> This section needs to reference the Codex General Standard for Food Additive (GSFA), Food Category and Table I, II or III. The</p>	<p><u>Recommendation:</u> It is recommended to replace the table of prescribed food additives and replace it with a general reference to the GSFA.</p>	<p>Accepted. Table of prescribed food additives has been replaced by a general reference to the GSFA to allow</p>

			general reference to the GSFA allows greater flexibility in the use of food additives. Also, if some food additives are decertified for use in this product or new ones are certified, the standard does not need to be revised to reflect the changes.		greater flexibility in the use of food additives.  Considering comments from US, Japan, Korea, and Thailand, this part is amended accordingly. Each item of food additive has been checked to see whether it falls into Tables 1 and 2 of the <i>General Standard for Food Additives</i> (CODEX STAN 192-1995) in food category 06.7 Pre-cooked or processed rice products, including rice cakes (Oriental type only) ; and whether it falls into Table 3 used as GMP. This part has been rearranged accordingly.
18	Thailand	8. Labelling	The detail of non-retail containers should be added as follows:	The product covered by the provisions of this Standard shall be labelled in accordance with the <i>General Standard for the Labeling of Prepackaged Foods</i> (CXS 1-1985). The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods</i> (CXS 346-2021). In addition, the following specific provisions apply:	Accepted. The detail of non-retail containers has been added.
19	Japan	8.1 Name of the food	<b>8.1 Name of the food</b>	<b>8.1 Name of the product</b>	Accepted. The title has been amended.
20	Japan	8.1 Name of the Food	If allowed by national legislation or otherwise identified to the consumer in the country where the product is sold, other names may be used.  Rationale : Japan proposes replacing the original text with the text which is used in other Codex Standards.	<b>Other names</b> may be used in accordance with the law and custom of the country in which the product is sold and in the manner not to mislead consumers.	Accepted. The text has been amended accordingly.  Examples of other names of product used in Asian countries, Zongzi, Chimaki, Ba- Jang, Khao Tom Mat, lotus leaf rice, Ketupat, Ma-chang and etc., are added as a footnote in the draft.
21	Thailand	8.1 Name of the Food	We would like to amend the sentence as follows	<u>The name of the product shall be “cooked rice wrapped in plant leaves”</u> . The product shall be labelled with the corresponding name described in	Accepted. The text has been amended accordingly.

			<b>Rationale:</b> To be consistent with other Codex standards such as Regional Standard for Fermented Soybean Paste (CXS 298R-2009), Standard for Fish Sauce (CXS 302-2011) and Standard for Ginseng Products (CXS 321-2015)	Section 2.2. If allowed by national legislation or otherwise identified to the consumer in the country where the product is sold, other names may be used.	
22	US	8.1 Name of the Food	<b>Issue &amp; Rationale:</b> This section fails to mention when the product has a filling. The filling must be indicated as part of the name, thereby providing information to the trader and consumer. Therefore, a new section is proposed.	<b>Proposal:</b> <b>8.1.2</b> The name of the product shall be <b>a)</b> For product without fillings - “Cooked rice wrapped in plant leaves” <b>b)</b> For product with fillings – Cooked Rice filled with [name of filling] as described in Section 3.1.2.	The comment has been taken into careful consideration.  As the fillings of “Cooked rice wrapped in plant leaves” vary a lot, ranging from all sorts of meat and vegetables to seafood, mushrooms and even fruit, which also vary greatly from countries to countries, and also from regions to regions within a certain country, it is difficult to name the product with “Cooked Rice filled with [name of filling]”.
23	US	8.3 Others	<b>Issue and Rationale:</b> This section should indicate the “consumer preparation methods.” e.g., Heat for 5 minutes at 50°C or microwave for 3 minutes etc.		Consumer preparation method (instruction for use) is contained in Section 4.8 of <i>General Standard for the Labeling of Prepackaged Foods (CXS 1-1985)</i> . The specific instructions for consumers is difficult to be given in this standard as the size, the proportion of the fillings, the total weight of the product and etc are different to some extent.  “Storage” and “Instruction for use” is not specified in this standard since the detail about instruction of storage and edible method are in <i>CXS 1-1985</i> .
24	The Republic of Korea	9. Methods of Analysis and Sampling	Method of analysis for determination of moisture content should be provided in this provision.  For determination of peroxide value, method for extraction of oil from food matrix and method for determination of		Moisture requirement has been deleted as recommended by Thailand and US.  Method for extraction of oil has been added in order to be consistent with other Codex standard, for example,

			peroxide value should be specified, respectively.		Standard for instant noodles (CXS 249-2006).
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