

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

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

SUBJECT Request for comments at Step 6 on the draft Standard for Non-centrifuged Dehydrated Sugar Cane Juice

DEADLINE 15 December 2017

COMMENTS **To:**
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BACKGROUND

- As host country to the Codex Committee on Sugars (CCS), Colombia is pleased to present the status of the draft revised standard for “non-centrifuged dehydrated sugar cane juice” (see Annex 1), which it submits for consideration by the Codex Alimentarius Commission (CAC).
- CAC38 returned the draft standard to Step 6 for comments on aspects relating to: name of the product, scope, chemical characteristics, labelling and methods of analysis. CAC39 asked CCS to clarify the scope of the standard and to provide evidence of international support for the scope defined. CAC40 extended the work by one year to enable CCS to continue developing the standard and to report on progress to CAC41.
- In compliance with the request and conclusion of CAC40, after analysing the comments of Brazil, Costa Rica, Cuba, Ecuador, Egypt, Japan, Kenya, Mexico, Philippines and United States of America to the latest circular letter CL 2017/45-CS, which are included in Annex 2, on which Colombia understands there to be consensus regarding the scope, and returning the draft standard to Step 6 in accordance with circular letter CL 2015/19-CS containing comments from Brazil, Canada, Costa Rica, Japan, Mexico, Philippines, United States of America and the European Association of Sugar Producers (CEFS), Colombia, as Chair of CCS, submits the following explanatory notes and proposal (Annex 1) to the Commission for consideration.

EXPLANATORY NOTES ON THE DRAFT REVISED STANDARD FOR NON-CENTRIFUGED DEHYDRATED SUGAR CANE JUICE STEP 6

Name of the product

4. The term centrifugated has been amended to “centrifuged” in the product name, which has become: “non-centrifuged dehydrated sugar cane juice”, as suggested in the comments received. Despite the fact that the product comes from sugar cane, the proposal to call it sugar, with another qualifying term relating to its processing, goes against the initial purpose of the work proposed and approved by the Commission, which was to cover a product that differs in nature to sugar, as demonstrated by the content of the draft standard. A number of comments agree that the name is too long. Unfortunately, in the time since work began, no consensus has been reached on a shorter, more memorable name that is more representative of the food.

5. With regard to the list of common names associated with the name of the product that was included as a footnote in previous versions of the draft standard, Colombia notes that the list should be the subject of further analysis when defining the product characteristics and it is concluded that the vernacular names used in various regions are those corresponding to the product derived from the draft standard. The list of local names used to identify the product could be expanded.

Section 1. Scope

6. The scope remains virtually unchanged. The amended [Spanish] text incorporates an editorial clarification, suggested in one comment, relating to the product when intended for further processing.

7. In response to one comment received, the stated purpose of the standard is also to prevent the product being obtained from the reconstitution of the components of sugar cane juice or by-products thereof, as is the case with sugar, that is to say, to prevent irregular practices, guaranteeing that the product marketed is the direct result of milling sugar cane and not the result of pre-processed products, which include not only sugar but also molasses to colour the product.

8. In summary, the comments received by Codex member countries and observers concerning the scope demonstrate broad international support for the proposal, which is presented in section 1 of the annex.

Section 2. Product definition

9. This section has been partially amended. In order to provide greater accuracy and avoid expressions that are confusing to consumers, the term “amorphous microcrystals invisible to the naked eye” has been removed from the product definition.

10. The term “genus” and the abbreviation “spp” have been added and the term “Officinarum L.” has been removed to avoid limiting the use of the different sugar cane varieties.

11. An extra paragraph has been included that reaffirms the provision prohibiting the product from being made from pre-processed sugars and syrups.

Section 3.1.1. Basic ingredients

12. This section remains virtually unchanged. The term “genus” and the abbreviation “spp” have been added and the term “*Officinarum* L.” has been removed in accordance with the previous section.

Section 3.2.1 Colour

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

Section 3.2.2 Flavour and aroma

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

Section 3.2.3 Defects

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

Section 3.2.4 Physical and chemical characteristics

16. It is reiterated that the product composition in the draft standard is expressed on a dry basis. This does not mean that the two styles mentioned – solid or moulded and granulated – no longer have any moisture content.

17. As in the previous version of the draft standard, only one table containing the requirements for ash, saccharose (% m/m), reducing sugars (% m/m) and proteins % (N x 6.25) is included. Moisture is the only requirement that is included separately, as it is a differentiating factor between the solid/moulded and granulated styles. Owing to its size and texture, the moisture content of the solid/moulded style is not normally similar to the granulated style.

- **Ash (% m/m):** the minimum value of 0.9 is maintained, without setting a maximum value. Only one of the delegations submitting comments expressed its disagreement with this provision. A point of note is that the purpose of including ash with a minimum value is to preserve the content of minerals during processing, as they are elements that add a differentiating nutritional factor to the food, minerals that are normally lost using a different processing method. No maximum value is included for ash because of the high variability of the soils where sugar cane is grown and the differing fertilization programmes that regions may implement.

- **Total sugars (saccharose) (% m/m):** The maximum value of 91 is retained; no minimum value is defined. Only one of the delegations submitting comments expressed its disagreement with this provision. A point of note is that a low saccharose content of around 80% makes it difficult to balance the product components. This low saccharose value of around 80% would also mean a high value of reducing sugars, greater than 15%, which would not only complicate product presentation but would also promote its degradation, owing to a higher moisture content, and would be likely to cause greater microbiological contamination.

- **Total sugars (reducing sugars) (% m/m):** Taking into account the comments received, the Codex Committee on Sugars submits for consideration by the Commission the lack of consensus on a value for this requirement. In their comments, several Codex members deviate significantly from the minimum value of 4.5 (% m/m) presented in the previous version of the draft standard, and even submit an option to define a maximum value for reducing sugars; as a result, the document mentions no value for this requirement, indicating it as “without consensus”.

- **Proteins % (N x 6.25):** Taking into account the comments received, the Codex Committee on Sugars submits for consideration by the Commission the lack of consensus on a value for this requirement. Consequently, as they are also a differentiating factor between the product in question and table sugar and by-products thereof, the document indicates it as “without consensus”.

18. The Committee reiterates that the content of reducing sugars, together with other provisions in the chemical characterization of the food, such as ash and protein content in the form of nitrogen, are some of the differentiating factors of this product with respect to table sugar and similar by-products thereof.

Section 4. Food additives

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

Section 5. Processing aids

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

Section 6 – Contaminants

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

Section 7 – Hygiene

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

Section 8 – Labelling

23. This section remains unchanged. However, as a result of the comments received on the name and possible weight differences for the solid style of the product owing to its hygroscopic properties, this section could be reviewed.

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

Section 9 – Methods of analysis and sampling

25. As a result of the comments received, the Codex Committee on Sugars confirms the lack of consensus on the methods of analysis to be presented in the document for consideration by the Codex Committee on Methods of Analysis and Sampling. In this regard, two preferences were put forward: one for the methods of the International Commission for Uniform Methods of Sugar Analysis (ICUMSA) and the other for AOAC methods. Therefore this section is also indicated as “without consensus”.

RECOMMENDATIONS

26. Colombia reiterates that the option of holding a face-to-face meeting of the Codex Committee on Sugars should not be ruled out as a way of expediting the steps in the draft standard because, while only a few aspects stand in the way of consensus, they are of a specific technical content that warrants direct dialogue and analysis by the stakeholders in order to reach a mutual understanding and to make definitive progress towards an agreement. Therefore, Colombia suggests that consideration be given to the possibility of shared funding of the meeting through International cooperation funds to cover the costs and expenses of holding a face to face meeting. As the current host country, Colombia could cover some expenses from its own resources. Colombia is also envisaging the possibility of investigating shared funding with a country interested in the draft standard.

REQUEST FOR COMMENTS

27. Codex members and observers are invited to submit comments on para. 26 and the draft standard as presented in Annex I.

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

**DRAFT CODEX STANDARD FOR
NON-CENTRIFUGED DEHYDRATED SUGAR CANE JUICE**

1. SCOPE

This Standard applies to non-centrifuged dehydrated sugar cane juice, as defined in section 2, intended for human consumption, including for catering purposes or pre-packaging as appropriate, as well as to the product intended for subsequent processing, where indicated. The Standard does not cover the product obtained from the reconstitution of its components.

2. PRODUCT DEFINITION

“Non-centrifuged dehydrated sugar cane juice” is the product obtained from the evaporation of sugar cane juice of the genus *Saccharum officinarum* L., which maintains its constituent elements, such as saccharose, glucose, fructose and minerals. In no case is this product totally or partially elaborated from already processed sugars or syrups.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 COMPOSITION

3.1.1 Basic Ingredients

Sugar cane juice of the genus *Saccharum Officinarum* L.

3.2 QUALITY FACTORS

3.2.1 Colour

“Non-centrifuged dehydrated sugar cane juice” may have a colour ranging from light to dark brown, 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. The product shall be free of unpleasant sensory characteristics.

3.2.3 Defects

The product shall be free from defects such as foreign materials or softening. It may not be fermented or show signs of attacks by fungi and insects.

3.2.4 Physical and chemical characteristics

“Non-centrifuged dehydrated sugar cane juice” shall fulfill the conditions shown in the following table as appropriate.

Requirement	COMPOSITION ON A DRY BASIS	
	Value	
	Minimum	Maximum
Ash (% m/m)	0.9	--
Saccharose (% m/m)	---	91
Reducing sugars (% m/m)	*	*
Proteins in % (N X 6.25)	**	**

* No consensus

** No consensus

Moisture	Maximum
"Solid" style (%)	9.0
"Granulated" style (%)	5.0

Note: Moisture is a differentiating factor between "solid" and "granulated" styles.

4. FOOD ADDITIVES

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

5. PROCESSING AIDS

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

6. CONTAMINANTS

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

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

7. HYGIENE

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

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

8. LABELLING

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

8.1 NAME OF THE PRODUCT

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

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

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

9. METHODS OF ANALYSIS AND SAMPLING

Provision	Method	Principle
Moisture	*	*
Ash	*	*
Total sugars (saccharose) and reducing sugars (glucose)	*	*
Protein	*	*

* With no consensus on the methods of analysis

COMMENTS SUBMITTED IN REPLY TO CL 2017/45-CS**BRAZIL**

Brazil recognizes the effort implemented by Colombia in trying to reach consensus but would like to reassess our complains that amending the title, removing the list of products and discussing product definition without viewing their associated provisions would lead to accommodate only non-centrifugal cane sugar following the suggested solo definition and a solo set of limits in the future.

From our perspective, such approach narrows the proposed standard for non-centrifugal sugars excluding those not closely related to "Panela". This jeopardizes Brazilian "Rapadura" and "Açúcar Mascavo".

In that sense, aiming an international standard for non-centrifugal sugars that pursue information to the amenability of the commodity to standardization (item "d" of the Guidelines on the application of the criteria for the establishment of work priorities as established on Section II: Elaboration of Codex Standards at the Procedural Manual), Brazil would like to access the guidelines, and to point out the need of an open approach to all related products.

Therefore, not to discontinue the work we would like to follow the "one step at a time approach", follow the guidance as provided and to discuss scope only, in line with the mandate of the working group as per the conclusions of the CCEXEC stated in Para 47 - REP16/EXEC, to CCS "clarify the scope of the standard only and to provide evidence of the international support for the defined scope".

To conclude Brazil's contribution to this document in an international and inclusive perspective, we would like to suggest the following adjustments to the proposed Annex:

DRAFT CODEX STANDARD FOR**NON-CENTRIFUGED DEHYDRATED SUGAR CANE JUICE (to be developed)**

Rationale: out of the mandate of the working group

1. SCOPE

This standard applies to Non-Centrifuged Dehydrated Sugar Cane ~~Sugar Juice~~, as defined in section 2, which is intended for direct consumption, including catering or re-packaging if required, as well as to the product when intended for further processing, where indicated. This standard does not apply to products obtained from the reconstitution of its components.

Rationale: a) Non-Centrifugal Cane Sugar - to provide amenability to the proposed standard we recommend to align the terminology from "non-centrifuged" to "non-centrifugal" as used by the FAO (e.g., <http://www.fao.org/es/faodef/fdef03e.HTM>). b) inclusion of the expression "where indicated" or "when indicated" is needed to empower inspection practices. Where not specified it brings uncertainty to the associated use/destination and may bounce inspection unintendedly.

2. PRODUCT DEFINITION (to be developed)

~~It is understood that Non-Centrifuged Dehydrated Sugar Cane Juice is a product obtained from evaporation of sugar cane juice *Saccharum officinarum* L., to maintain its constituent elements such as saccharose, glucose, fructose and minerals. Under no circumstances is this product made totally or partially from preprocessed sugars or syrups.~~

Rationale: out of the mandate of the working group

COSTA RICA

Costa Rica agradece la oportunidad de enviar comentarios; en ese sentido desea manifestar su apoyo a las enmiendas propuestas y a aprobación por parte de la CAC como norma mundial o regional.

CUBA

En respuesta al documento CL 2017/45-CS **Solicitud de observaciones sobre el proyecto de Norma para el Jugo de Caña de Azúcar Deshidratado No Centrifugado (Ámbito de aplicación y definición del producto)**, Cuba está de acuerdo con lo expuesto en el documento.

ECUADOR

Ecuador agradece a Colombia la oportunidad de comentar el documento: "PROYECTO DE NORMA CODEX PARA EL JUGO DE CAÑA DE AZÚCAR DESHIDRATADO NO CENTRIFUGADO".

De acuerdo a lo mencionado Ecuador desea realizar las siguientes observaciones específicas:

- **NOMBRE DEL PRODUCTO:**

Ecuador apoya el nombre “JUGO DE CAÑA DE AZÚCAR DESHIDRATADO NO CENTRIFUGADO”, sin embargo mantiene su posición respecto a que se especifique el **nombre común** que este producto recibe en cada uno de los países, por ejemplo en Ecuador se denomina “PANELA”, con el objetivo de no causar confusión en el consumidor.

- **ÁMBITO DE APLICACIÓN**

Esta norma se aplica al jugo de caña de azúcar deshidratado no centrifugado, según se define en la sección 2 que está destinado al consumo directo, inclusive para fines de hostelería o para reenvasado en caso necesario, como también al producto cuando se indique que está destinado a una elaboración ulterior. Esta norma no se aplica a los productos obtenidos a partir de la reconstitución de sus componentes.

Ecuador:

Se sugiere aumentar en el párrafo 1 lo siguiente:

Esta norma se aplica al jugo de caña de azúcar deshidratado no centrifugado, según se define en la sección 2 que está destinado al consumo directo, inclusive para fines de hostelería o para re-embasado en caso necesario, como también al producto cuando se indique que está destinado a una elaboración ulterior un proceso de elaboración posterior. Esta norma no se aplica a los productos obtenidos a partir de la reconstitución de sus componentes.

- **DEFINICIÓN DEL PRODUCTO**

Se entiende por jugo de caña de azúcar deshidratado no centrifugado al producto obtenido de la evaporación del jugo de caña de azúcar *Saccharum officinarum L.*, que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales. En ningún caso este producto se elabora total o parcialmente a partir de azúcares o jarabes ya procesados.

Ecuador:

Propone aumentar dentro de párrafo, “Se entiende por “jugo de caña de azúcar deshidratado no centrifugado”, al producto obtenido por la evaporación del jugo de caña de azúcar, proveniente de diferentes variedades pertenecientes a la familia de las gramíneas, (*Saccharum officinarum L.*), que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales. En ningún caso este producto se elabora total o parcialmente a partir de azúcares o jarabes ya procesados.

EGYPT

Egypt agrees the scope and product definition of "DRAFT CODEX STANDARD FOR NON-CENTRIFUGED DEHYDRATED SUGAR CANE JUICE" as received in the attached document.

JAPAN

Japan would like to express its appreciation for Colombia as host country of the Codex Committee on Sugar (CCS), and is pleased to provide the following comments.

General Comments

Japan would like to reiterate that CAC39 endorsed the recommendation of CCEXEC71: to request the Committee on Sugars, working by correspondence, to clarify the scope of the standard and to provide evidence of the international support for the defined scope.

As discussed at CCEXEC (please refer to CX/EXEC 17/73/7), ensuring transparency is most important for the chair of a committee working by correspondence to respond to all submitted comments to reach consensus, since all questions raised during physical meeting are supposed to be addressed in accordance with Procedural Manual. However we have not received any clear responses from Colombia so far.

Therefore, with regard to transparency, Japan has deep concerns of this procedure.

Specific Comments

Japan would like to seek clarification on the following points.

1. The list of products is removed from the Name of Standard. With regard to “1. Scope”, Japan would like Colombia to clarify whether Japanese Kokutou is included in this draft Standard. Japan believes this draft Standard should be applicable to Kokutou and other related products in terms of its physical and chemical characteristics.

If it doesn't include Kokutou and other related products, Japan would like to suggest this draft Standard should be developed as a regional Standard but not an international Standard.

2. Japan would like Colombia to indicate what “products obtained from the reconstitution of its components” are.

KENYA

DRAFT CODEX STANDARD FOR NON-CENTRIFUGED DEHYDRATED SUGAR CANE JUICE JAGGERY

1. SCOPE

This standard applies to Non-Centrifuged Dehydrated Sugar Cane jaggery Juice, as defined in section 2, which is intended for direct consumption, including catering or re-packaging if required, as well as to the product when intended for further processing. This standard does not apply to products obtained from the reconstitution of its components.

2. PRODUCT DEFINITION

Sugarcane jaggery is a ~~It is understood that~~ Non-Centrifuged Dehydrated Sugar Cane Juice ~~is a~~ product obtained from evaporation of sugar cane juice *Saccharum officinarum L.*, to maintain its constituent elements such as saccharose, glucose, fructose and minerals. Under no circumstances is this product made totally or partially from preprocessed sugars or syrups.

MEXICO

México agradece la oportunidad de expresar sus comentarios a la CL 2017/45-CS Solicitud de observaciones sobre el proyecto de Norma para el Jugo de Caña de Azúcar Deshidratado No Centrifugado (Ámbito de aplicación y definición del producto).

Al respecto, se envían los comentarios siguientes:

- El título asignado al Proyecto de Norma en comento, NO define con claridad al producto a normar, situación que ha creado confusión entre los diversos países, al no estar claro a qué producto o productos está dirigida la norma que se propone.
- El PROYECTO DE NORMA CODEX debe referirse ÚNICAMENTE a Piloncillo (también conocido como “Panela” o “Panocha” en México y en otros países de América Latina) definido como el “Producto sólido obtenido por la evaporación directa del jugo puro de caña de azúcar *Saccharum officinarum L.*, que contiene microcristales amorfos no visibles al ojo humano, que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales”.
- El instrumento normativo no cuenta con la claridad suficiente para la definición del producto, su delimitación y diferenciación respecto a otros azúcares, como pudiera ser el azúcar amorfo que elabora Brasil y el piloncillo que se elabora en México y otros países de América Latina y que comúnmente se conoce con esa o con las denominaciones de “panela” o “panocha”, como se ha indicado.
- En el Proyecto de Norma que se analiza, observamos que, dado su título y las deficiencias en la definición del producto, su delimitación y diferenciación con otros azúcares, es difícil que exista claridad en los puntos relevantes como lo son FACTORES DE CALIDAD, NOMBRE DE PRODUCTO, MÉTODOS DE ANÁLISIS Y MUESTREO, toda vez que en el PROYECTO DE NORMA CODEX se abren posibilidades para la ampliación de la definición del producto y las características fisicoquímicas que pueden abarcar otros productos similares no estrechamente relacionados con el piloncillo o panela, que es el producto que se pretende normar.

PHILIPPINES

The Philippines would like to thank Colombia for this opportunity to provide the following comments in response to **CL 2017/45-CS** on the Proposed Draft Standard for Non-Centrifuged Dehydrated Sugar Cane Juice.

General Comment:

The Philippines appreciates Colombia’s continuing effort for the development of this standard but would like to reiterate issues left unaddressed including, mainly, on the name of the product. It has been previously suggested that the product name which is Non-Centrifuged Dehydrated Sugar Cane Juice be replaced with Non-Centrifugal Cane Sugar. This has been suggested by several countries including the United States, Brazil and the Philippines as response to several circular letters calling for comments.

Specific Comments:

For clarity, the Philippines proposes the following edits to the scope and product definition:

1. SCOPE

The standard applies to ~~Non-Centrifuged Dehydrated Sugar Cane Juice~~ Non-Centrifugal Cane Sugar, as defined in section 2 which is intended for direct consumption, including catering or re-packaging if required, as well as to the product when intended for further processing. This standard does not apply to the products obtained from the reconstitution of its components.

Rationale: "Non-centrifugal" is the correct and appropriate term to use to indicate that it has been produced without centrifugation. The commodity standard being developed is for sugar and not for sugarcane juice.

2. PRODUCT DEFINITION

~~It is understood that Non-Centrifuged Dehydrated Sugar Cane Juice~~ Non Centrifugal Cane Sugar is a product obtained from evaporation of sugarcane ~~juice~~ *Saccharum officinarum* L. juice to maintain its constituent elements such as ~~saccharose~~ sucrose, glucose, fructose and minerals. Under no circumstances is this product made totally or partially from preprocessed sugars or syrups.

Rationale:

- a. Sugarcane is correctly written as a single word.
- b. *Saccharum officinarum* L. is the scientific name of sugarcane not of the sugarcane juice, hence should be placed after sugarcane in the definition.
- c. Again, we recommend the use of sucrose instead of "older" saccharose in the document.

UNITED STATES OF AMERICA

The United States would like to provide the following response to the request for comments in Circular Letter (CL) 2017/45-CS on the draft *Standard for Non-centrifuged dehydrated sugar cane juice* (scope and definition of the product).

General Comments

The United States would like to compliment Colombia in its efforts to present a new proposal that considered not only the scope, but also the product definition and the name of the product, in an attempt to bring the interested parties closer together. However, the United States is disappointed to see the name of the product revert to an earlier version, despite our previous comments on CL2015-19-CS and CL 2016/15-CS that strongly opposed naming the product "Non-Centrifuged Dehydrated Sugar Cane Juice." Removing "concentration" and "stirring" from the product definition (paragraph 10 of CL 2017/45-CS) does not change the fact that this product is a type of non-centrifugal sugar.

Furthermore, our comment about the adoption of [FAO](#) terminology "non-centrifugal" was not addressed in CL2017-45-CS. The United States would like to understand the rationale for not adopting the FAO terminology, especially when it was recommended by several of the member countries during previous discussions of the working group. The United States strongly believes that it is more appropriate to name the product "Non-Centrifugal Raw Cane Sugar" than "Non-Centrifuged Dehydrated Sugar Cane Juice."

Given that this draft standard is at Step 6 in the Codex process, the United States believes that there are still a number of outstanding issues that prevent it from being advanced for final adoption at this session of the CAC.