

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7

MAS/37 CRD/29
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON METHODS OF ANALYSIS SAMPLING

Thirty-seventhth Session
Budapest, Hungary, 22 – 26 February 2016

(Comments prepared by IFU)

Review and updating of Codex Standard 234-1999

The International Fruit Juice Union (IFU) would like to commend the enormous amount of work that Brazil, Japan and the e-WG have done so far on the updating of CXS-234-1999. From the number of questions posed by the working group we can all see that the revision of this standard is well overdue, and highlights the need to do this type of exercise on all standards on a regular basis to ensure that they contain the correct information and are still relevant to a user's needs and offers "fit for purpose" methods.

Background the Codex Standard 247-2005

As we highlighted in our CRD (CCMAS-36/CRD23) at the 36th meeting in Budapest last year the Codex standard for fruit juices (CXS-247-2005) was not prepared by a standing Commodity committee of Codex but by a special a task force enacted specifically for this purpose by CAC. During their four meetings the original draft, prepared by IFU, was further elaborated by Governments and interested parties prior to its final publication in 2005.

Although most juice producers are honest, there are always some around the world that wish to make illicit profits by passing off products adulterated with sugar, acids or cheaper juices, as a pure juice or pure juice concentrate as highlight at CCMAS 37 by Iran. To help control this long running problem the task force was clear that due to the very complex nature of assessing the authenticity of these products there was a need to include within the standard a list of methods that were suitable to assess the authenticity of fruit juices.

Unlike other Codex standards, where there is a provision for which a suitable method, or criteria for the procedure is given, which enables an analyst to judge if a product is in accord with the standard. Generally it is never possible to use a single method to determine if a fruit juice is authentic. However, on occasions a single method can be used to determine if a product is adulterated, such as if it contains D-malic acid or has an abnormal $\delta^{13}\text{C}$ value for instance. This means that the analyst will often have to use a "holistic approach" using a number of the procedures defined in the standard to determine if a product conforms to the Codex standard as pure and of a suitable quality.

In order to develop a list of suitable procedures, for inclusion within the fruit juice (FJ) standard, a small specialist's sub-group of analysts was set up under the chairmanship of Canada. They were tasked with the preparation of a list of procedures that should be used to determine the authenticity of juice products. This list was presented at the 25th meeting of CCMAS for approval prior to standard publication. However, this presented a major issue for CCMAS as most of the recommended methods did not actually have a defined "provision" within the FJ standard. This meant that CCMAS did feel they were able to approve the procedures where there was no defined provision in the standard and so most procedures were rejected.

Now in an ideal world, the task force could have drawn up a value for each “provision” for the proposed methods. However, in the short time allocated, four meetings, for standard preparation it would have been impossible to even set these values for the main commodities e.g. orange, apple, grape, pineapple grapefruit, and get consensus between all Governments let alone some of the more obscure juice products contained within the standard, where data would not be available. It should be noted the effort that the Task force had to put into getting agreement for a single parameter, the soluble solids content (Brix) of the 91 juices contained in the FJ standard. The final values for orange, apple, pineapple were not approved until the final meeting in Fortaleza in 2004 after “**intensive**” discussion and compromise between Governments.

Rejection of the proposal by CCMAS was a blow to the task force as they felt it was essential to include these procedures so that consumers could be protected from the sale of adulterated or sub-standard products. In the light of this issue the task force introduced three new sections into the standard:-

3.2 QUALITY CRITERIA

3.3 AUTHENTICITY

3.4 VERIFICATION OF COMPOSITION, QUALITY AND AUTHENTICITY

This effectively generated a “provision” in the standard for “quality” and “authenticity” and gave the methods a provision against which conformance could be assessed. Now each method has a provision, such as for acetic or benzoic acids, but no control value or range was prescribed in standard for the methods due to the time constraints. The logic of this revision of the standard was presented to the 26th session of CCMAS and the meeting accepted this new initiative and the methods were approved prior to the publication of the Standard in 2005.

Standard 234 updating

Although we agree in principle with the logic of the other SDOs, outlined in CCMAS 36/CRD21, which the committee’s operation could be made simpler if there was only one central list of methods, IFU thinks that there is a critical need to keep the methods listed within CXS-247.

1. There is no numerical provision within the standard for most of the methods recommended in the Standard
2. To make an assessment of the authenticity of a fruit juice a number of the methods prescribed in the FJ standard have to be applied to build up an overall “profile” of the product to ensure that it conforms to the demands of consumers for authentic and quality products
3. Inclusion of the methods in the FJ standard ensures that it is clear to an analyst what needs to be carried out to control this type of commodity as in most cases no single method is sufficient
4. IFU does not think it would be clear to all analysts that there was a separate Codex standard that contained the details of all Codex approved methods. Although the IFU representative has attended a number of CCMAS meetings over the last 10 years, it was not until the committee embarked on the revision of the “methods” standard (234), a couple of years ago, that he even became aware of this “standard of standard methods”. We suspect that many other analysts, who are not highly involved in Codex work, would also be unaware of this document and so if they were looking for suitable methods for a particular product they would specifically search within the commodity standard relevant to their need rather than within “methods standard” CXS-234.

For the final reason highlighted in 4 there may well be a need to keep all methods within their respective commodity standards.

If the general consensus of the committee is that the Codex approved methods should be removed from the individual standards and that they are just held in one central standard, IFU would ask that the committee to continue with it precedence and treat fruit juices differently. We strongly feel for the reasons identified above that the methods for fruit juices should remain within their commodity standard.

However, if there is a need to remove the methods from the CXS-247, we would ask that the critical link between the criteria within the standard and the “fit for purpose” methods is maintained. We feel that the minimum required is a hyper-link between CXS 247 and 234 to seamlessly link the two Standards is included to make it transparent to an analyst what is required to ensure conformance to the fruit juice standard to safeguard the health and wellbeing of consumers.