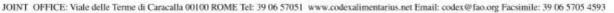
codex alimentarius commission



FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS





ALINORM 01/25

JOINT FAO/WHO FOOD STANDARD PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-fourth Session Geneva, 2-7 July 2001

REPORT OF THE SEVENTH SESSION OF THE CODEX COMMITTEE ON SUGARS London, 9-11 February 2000

codex alimentarius commission



FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION



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CX 5/10.2

CL 2000/5-S April 2000

- To: Codex Contact Point Interested International Organizations
- From: Secretary, Codex Alimentarius Commission, FAO Viale delle Terme di Caracalla, 00100 Rome, Italy

Subject: Distribution of the Report of the Seventh Session of the Codex Committee on Sugars (ALINORM 01/25)

The Report of the Seventh Session of the Codex Committee on Sugars is attached. It will be considered by the Twenty-fourth Session of the Codex Alimentarius Commission (Geneva, Switzerland, 2 - 7 July 2001).

MATTERS FOR ADOPTION BY THE 24TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

- 1. **Draft Revised Standard for Honey at Step 8**; ALINORM 01/25, Appendix II.
- 2. **Proposed Draft Amendment for the Standard for Sugars at Step 5/8;** ALINORM 01/25, Appendix III

Governments and international organizations wishing to propose amendments or comments on the above matters should do so in writing in conformity with the Guide to the Consideration of Standards at Step 8 of the Procedure for the Elaboration of Codex Standard Including Consideration of Any Statements Relating to Economic Impact (*Procedural Manual of the Codex Alimentarius Commission*, Tenth Edition, pages 24-25). Proposed amendments or comments should be sent to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, FAO, Viale delle Terme di Caracalla, 00100 Rome, Italy (fax: +39 (06) 570.54593 or E-mail: codex@fao.org), not later than <u>31 March 2001</u>.

SUMMARY AND CONCLUSIONS

The Seventh Session of the Codex Committee on Sugars reached the following conclusions:

MATTERS FOR CONSIDERATION BY THE EXECUTIVE COMMITTEE AND/OR THE CODEX ALIMENTARIUS COMMISSION

- > Draft Revised Standard for Honey for adoption at Step 8 (para. 50);
- > Proposed amendments to the Revised Standard for Sugars for adoption at Step 5/8 (para. 66);
- > The following proposed future work of the Committee:
- Consideration of Proposed Amendments to the Codex Standard for Sugars;
- Development of Standards for Unifloral Honeys;
- Completion of Part two of the Standard for Honey covering industrial uses; for approval (para 69).

OTHER MATTERS OF INTEREST TO THE COMMISSION

- Agreed to report back to the Codex Committee on General Principles that in its own work the following factors were relevant elements of other legitimate factors:
 - Economic considerations;
 - Consumer information;
 - Good agricultural and manufacturing practices (para. 6).
- Agreed to refer the proposal to elaborate the Code of Hygienic Practice for Honey to the Codex Committee on Food Hygiene in order to examine the necessity of its preparation (para. 68).
- Agreed to retain an Annex and the disclaimer appearing at the top of the annex understanding that discretionary elements should be placed in the Annex while noting that the disclaimer would not change the legal status of the Annex (paras 5, 31).
- Noted that the establishment of concrete quantitative provisions for arsenic and lead to be included in the Draft Revised Standard for Honey, as was referred to this Committee by the 21st Session of the Codex Committee on Methods of Analysis and Sampling (ALINORM 99/23A, Part II of Appendix V), fell under the Terms of Reference of the Codex Committee on Food Additives and Contaminants rather than the Committee on Sugars (para. 18).

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REPORT OF THE SEVENTH SESSION OF THE CODEX COMMITTEE ON SUGARS London, United Kingdom 9-11 February 2000

INTRODUCTION

1. The Codex Committee on Sugars (CCS) held its Seventh Session in London, United Kingdom from 9 to 11 February 2000, by courtesy of the Government of the United Kingdom. The Session was chaired by Mr Grant Meekings, Head, Food Labelling and Standards Division, Joint Food Safety and Standards Group, Ministry of Agriculture, Fisheries and Food. A Complete list of participants is included as Appendix I to this report.

OPENING OF THE SESSION

2. The Session was opened by Mr Grant Meekings, who on behalf of Baroness Hayman, Food Minister of the United Kingdom, welcomed the participants and wished all success in their work in the new Millennium. Mr Meekings reminded the Committee that it had been adjourned *sine die* since 1974 and emphasised that the main purpose of the current session was to complete an agreed text for the Draft Standard for Honey and, if time allowed, to deal with the proposed amendments to the Standard for Sugars.

ADOPTION OF THE AGENDA (AGENDA ITEM 1)¹

3. The Committee adopted the Provisional Agenda as the Agenda of the Session.

MATTERS REFERRED TO THE CODEX COMMITTEE ON SUGARS BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES (AGENDA ITEM 2)²

4. The Committee noted the information presented in document CX/S 00/2 concerning the matters referred to the Codex Committee on Sugars by the Codex Alimentarius Commission and other Codex Committees. The Committee noted in particular the decision of the Commission, amending the Rules of Procedures of the Codex Alimentarius Commission that every effort should be made to adopt Codex Standards by consensus.

5. The Committee noted further that the Codex Committee on General Principles ruled that from the viewpoint of WTO the Annexes to Codex Standards had the same status as the body of Standard. The Committee noted that the consideration of the legal implications of the Annexes was outside the terms of reference of this Committee; the decision should be taken by the WTO Commission. The Committee agreed that the Committee would retain the current practice under the common understanding that discretionary elements should be placed in the Annex.

6. The Delegation of Portugal, speaking on behalf of the European Union, drew the attention of the Committee to the importance of discussing other legitimate factors. The Committee recalled that the Codex Committee on General Principles (ALINORM 99/33A, paras 64-74) while considering the role of Science and Other Legitimate Factors in Relation to Risk Analysis, had asked for information from relevant Committees on other relevant factors taken into account in their work. The Committee agreed to report back to the Codex Committee on General Principles that in its own work the following factors were relevant:

² CX/S 00/2

¹ CX/S 00/1

- Economic considerations;
- Consumer information;
- Good agricultural and manufacturing practices.

DRAFT REVISED STANDARD FOR HONEY (AGENDA ITEM 3)³

7. The Committee recalled that the 21st Session of the Codex Alimentarius Commission had decided that the draft Revised Standard for Honey should be elaborated through correspondence by the Government of the United Kingdom, Host Government of the Committee. The Draft Revised Standard for Honey was submitted to the 22nd Session of the Codex Alimentarius Commission for adoption at Step 8. The Commission agreed to return the Draft Revised Standard for Honey to Step 6 for further consideration.

8. The current Draft Revised Standard for Honey (at Steps 6/7), contained in document CX/S 00/3, was prepared by the Government of the United Kingdom on the basis of comments submitted by governments and international organizations in response to Circular Letter CL 1998/12-S. The Committee agreed to consider the new draft section by section.

Section 2.1 Scope

9. The Committee had an in-depth debate on the scope of the Standard for Honey. Opinion of the Committee was divided whether or not to limit the scope of the Standard to honey produced by *Apis mellifera* and used for direct consumption. The Committee recalled that the drafting of the Standard for Honey had been undertaken on the understanding that the Standard for Honey was based on the original scope and applied to honey produced by *Apis mellifera* for direct consumption. The Committee recognized that by doing so a considerable part of the honey in world trade would be excluded from the scope of the Standard for Honey. Some Delegations indicated that the phrase "industrial honey" or "honey for industrial use" should be defined in order to avoid any confusion.

10. The Committee agreed that the Standard for Honey should be prepared in three parts. The first part would apply to all honeys produced by *Apis mellifera* bees and cover all styles of honey presentations which were processed and intended for direct consumption. Part two would cover honey for industrial uses or as an ingredient in other foods and Part three would cover honey produced by other species of honey producing bees. The Committee noted that the work on the parts on honey not covered by Part one would constitute new work which would be subject to approval by the Codex Alimentarius Commission.

11. In order to clarify that the Standard would cover any honey in bulk containers which may be sold as retail, the Committee agreed to amend Section 1.2 to read "Parts one and three of the Standard also cover honey which is packed for sale in bulk containers, which may be repacked into retail packs."

Section 2.2 Description

12. Concerning the proposal made by the Delegation of Poland to include a new definition of blossomhoneydew honey, the Committee agreed that this issue should be addressed under the section for labelling.

3. Essential Composition and Quality Factors

13. The Committee agreed that no substances should be added to honey, not even components of honey but that honey can be blended with other honey. Therefore the first sentence of section 3.1 was amended as follows: "Honey sold as such shall not have added to it any food ingredient, including food additives, nor shall any other additions be made other than honey".

14. While considering the issue of filtration, several Delegations were of the opinion that the filtration should be restricted so that no pollen or constituents particular to honey should be lost. It was proposed that specification applied for filtration should be clearly given. It was pointed out that pollen was used to

³

CX/S 00/3, CX/S 00/3 Add., CRD/1

identify the botanical and geographical origin of honey and loss of pollen through filtration would undermine the labelling provisions as far as the authenticity of the honey was concerned.

15. Some other Delegations were of the view that filtration was an established process accepted by consumers to assure honey was free from foreign objectionable matters and that the existence or absence of pollen had a negligible influence on preventing adulteration.

16. The Committee agreed that if honey had undergone filtration the final product should be labelled accordingly under the section for labelling. The Committee also agreed to slightly modify the third sentence of section 3.1, to read "No pollen or constituent particular to honey may be removed except where this is unavoidable in the removal of foreign inorganic or organic matter."

Section 3.4 Moisture Content

17. The Committee accepted the proposal of the Delegations of Canada, supported by many other delegations and the observer of Apimondia, to reduce the level of moisture for Clover honey to 20%.

Section 4. Contaminants

18. The Committee noted that the establishment of concrete quantitative provisions for arsenic and lead to be included in the Draft Revised Standard for Honey, as was referred to this Committee by the 21st Session of the Codex Committee on Methods of Analysis and Sampling (ALINORM 99/23A, Part II of Appendix V), fell under the Terms of Reference of the Codex Committee on Food Additives and Contaminants rather than the Committee on Sugars.

19. In order to address the use of veterinary drugs for treatment of honey bees, the Committee agreed to amend the heading of Section 4.2, to read "Residues of Pesticides and Veterinary Drugs" and refer the issue to the Codex Committee on Residues of Veterinary Drugs in Foods.

Section 5. Hygiene

20. The Committee noted that the language now used for Sections 5.1 and 5.2 was that approved by the 22^{nd} Session of the CAC for the use in commodity standards. The Committee agreed to delete Section 5.3 entirely, recognizing that its provisions were already covered.

Section 6 Labelling

21. The Committee agreed to a tighter formulation for Section 6.1.1 to read: "Only products conforming to Part one of the Standard shall be designated 'honey."

22. Regarding the designation of honeydew honey, opinion was divided on whether its use was compulsory or voluntary; in countries where blossom honey represented a major part of the national honey market, the designation of honeydew honey was regarded as compulsory. The Committee decided, however, that designation of honeydew honey should remain voluntary and agreed to the following wording for section 6.1.3: "For products described in 2.1.2 the word "honeydew" may be placed in close proximity to the name of the food."

23. The Committee agreed to the proposal of the Delegation of Poland to include a new labelling provision for the mixture of blossom honey and honeydew honey, to read: "For mixtures of the products described in 2.1.1 and 2.1.2 the name of the food may be supplemented with the words "a blend of honeydew honey with blossom honey."

24. Some countries indicated that the provisions of the proposed section 6.1.7 might be duly covered by the Section 4.5 of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985). In order to address the specific interest of consumers in the origin of this commodity, the Committee decided however to amend this section, to read: "Where honey has been designated according to floral, plant source, or by the name of a geographical or topological region, then the name of the country where the honey has been produced shall be declared."

25. The Committee agreed to simplify the definitions of different extraction methods from combs of honey under section 6.1.9 by deleting the words "with or without the application of moderate heat". It agreed further to delete the word "only" from item (a) of the same section.

26. The Committee also agreed to the proposal of South Africa to include "chunk honey" as an alternative term for cut comb in honey in section 6.1.10 (c).

27. The Committee had an extensive debate on heating and pasteurisation of honey in conjunction with its labelling requirement. Some Delegations proposed that pasteurised honey should be labelled accordingly. The Committee, recalling that the agreed text of section 3.2 excluded the heating or processing of honey to an extent that its essential composition is changed and/or its quality was impaired, and decided not to included a specific provision addressing pasteurization under the section for labelling. The Committee noted that section 3.1 of the Codex General Standard for the Labelling of Prepackaged Foods might give a certain guidance to address consumers' concern in this respect.

28. In relation to the labelling of filtered honey some Delegations reiterated their view that all honeys were filtered to some extent and that only a process which involved the removal of all pollen should be labelled and the term "ultrafitration" was proposed in place of "filtration." The Committee could not agree to this but being aware of the necessity to keep in conformity with the third sentence of section 3.1, decided that the process of filtration should be indicated on the labelling and agreed on the wording "Honey which has been filtered in such a way as to result in a significant removal of pollen shall be designated 'filtered honey'" (Section 6.1.12 of the Annex).

29. In the course of the discussion concerning the quality of honey, some Delegations noted that quality requirements should include antibiotic activity. However, the Committee agreed to replace the word "manufacturer" with the words "producer, processor" in Section 6.2.1.

7.3 Determination of sugars added to honey (authenticity)

30. The Committee agreed to delete AOAC 979.22 for TLC (thin layer chromatography) from under section 7.3.

ANNEX

31. The Committee confirmed that the disclaimer appearing at the top of the Annex should be retained, while noting that its retention would not change the legal status of the Annex.

32. The Committee agreed to re-examine the appropriate location for the provisions now included in the Annex. The Delegation of Argentina, supported by the Delegation of Portugal, speaking on behalf of the European Union, proposed to move all provisions concerning composition and quality factors to the body of the Standard. The Committee finally agreed to move Sections 1.1, 1.2 and 1.3 of the Annex only to Section 3 of the body of the Standard which were renumbered as 3.5, 3.6 and 3.7, respectively.

33. The Delegation of Australia and the Delegation of Portugal, speaking on behalf of the European Union, expressed their reservations on this decision.

34. The Committee noted the explanation given by an expert of Apimondia that the new alternative methods, such as the chromatographic measurements of fructose and glucose content (2.2.1.1), sucrose content (2.2.1.2) and electrical conductivity (2.2.4) were now accessible to developing countries, thus the old non-specific methods could be replaced by the modern methods for determining specific sugars.

35. The Committee noted that as a result of the transition from the non-specific methods to the more modern methods it would be necessary to adjust accordingly the levels of specific sugars in the Draft Standard. The Committee further agreed that some botanical names should be corrected.

Alternative Section 1.1 (new Section 3.5 of the body of the Standard)Sucrose Content

36. The Delegation of Portugal, speaking on behalf of the European Union, while not opposing to the adoption of the text as it stood, asked the Committee to record its position that the value for item (b) should be 60 g/100g.

Alternative Section 1.3 (new Section 3.7 of the body of the Standard)Electric Conductivity

37. With respect to the enquiry of the Delegation of France concerning the rationale of the exceptions under (c), the Committee noted the clarification by the Secretariat that the value of electrical conductivity of those honeys mentioned in (c) was extremely variable and no specific limit could be applied.

Section 1.4 (new Section 1.1) Acidity

38. The Committee agreed that the title of this section be corrected to read "Free Acidity."

Section 1.5 (new Section 1.2) Diastase Activity

39. The Delegation of the United States proposed to retain the value of 3 Schade Unit, which was the value included in the existing Standard for Honey and requested that a scientific justification should be needed to change that value to 8 Schade Unit. The Delegation of Portugal, speaking on behalf of the European Union referred to the existing European Directive and argued that the value of 8 Schade Unit was justified after many years of experience.

40. After in-depth debate the Committee, recognized that some countries may still have difficulties with the proposed value of 8 Schade Unit. However the second part of the current wording in the Section might overcome these difficulties and the Committee therefore agreed to retain the wording as it stood in the Draft Standard.

Section 1.6 (new Section 1.3) Hydroxymethylfurfural Content

41. The Committee had a lengthy debate on the maximum amount of hydroxymethylfurfural (HMF). Several countries favoured reducing the current content from 80 mg/kg to 40 mg/kg while others argued that such reduction was not achievable in countries with hot climate and when honey was shipped to distant markets. Therefore the reduction might be considered a barrier to trade. Different opinions were also expressed regarding the amount of HMF for industrial honey and blends of honey.

42. The Committee finally agreed to a proposal made by the Chairman to read: "The hydroxymethylfurfural content of honey after processing and/or blending shall not be more than 40 mg/kg. However, in the case of honey of declared origin from countries or regions with tropical ambient temperatures, and blends of these honeys, the HMF content shall not be more than 80 mg/kg.

43. The Delegation of Portugal, speaking on behalf of the European Union, indicated that it could accept the Chairman's proposal as part of an overall compromise on the Draft Revised Standard. However, it expressed its regret that the Committee was unable to agree to the EU's preferred solution, that was that the limit of 80 mg/kg be restricted to honey for industrial uses coming from tropical climate.

44. The Delegation of the United States expressed its reluctant consent to this decision.

2.2 Sample Preparation

45. The Committee agreed to the proposals submitted by Poland and the Slovak Republic that the sample preparation for the measurement of HMF should be done without heating.

Section 2.2.2. Determination of Apparent Sucrose Content

46. The Committee agreed to delete the methods mentioned under this section.

Sections 2.2.4, 2.2.5, 2.2.6, 2.2.7

47. The Committee agreed to include the proposed methods appearing under sections 2.2.4 (alternative), 2.2.5. 2.2.6 and 2,2,7.

48. The Committee noted the comment by the Delegation of Italy that Phadebas method (2.2.6.2) was only suitable for honeys with a diastase activity between 6 and 40 Shade Unit and agreed that this comment should be directed to the Committee on Methods of Analysis and Sampling

Section 2.3 Literature references

49. The Committee agreed that the references under this section would be sent to the CCMAS for consideration as to which should be retained.

STATUS OF THE DRAFT REVISED STANDARD FOR HONEY

50. The Committee agreed to forward the Draft Revised Standard for Honey to the 24th Session of the Codex Alimentarius Commission for adoption at Step 8. (See Appendix II to this report)

PROPOSED AMENDMENTS TO THE REVISED CODEX STANDARDS FOR SUGARS (AGENDA ITEM 4)⁴

51. The Committee recalled that the mandate given by the 23^{rd} Session of the Commission to the Committee on Sugars was to consider three groups of amendments proposed by the Delegation of Mauritius and other Member Countries on:

- Definition of Raw Cane Sugar and Soft Sugars;
- Food Additives and Contaminants;
- Methods of Analysis for Inclusion in the Standard.

52. The Committee agreed to establish an Ad Hoc Working Group to be chaired by Dr Roger Wood, United Kingdom, to examine proposed methods of analysis for inclusion in the Standard for Sugars.

DEFINITION OF RAW CANE SUGAR AND SOFT SUGARS

53. The Committee agreed to insert the word "cane" before the word "molasses" in the definition of Raw Cane Sugar. However, it did not support any further proposed amendments. The Committee noted, however, additional proposals for the definition of Raw Cane Sugar.

54. The Committee accepted the proposal to remove the brackets from "plus invert sugar' in the definition of Soft Brown Sugar and Soft White Sugar, but did not accept the proposal to insert "raw" before "sugar" in the definition of Soft Brown Sugar. The Delegation of Portugal, referring to the EU comments in CRD 3, indicated that soft sugars had been produced by refiners for many decades and that their products were indeed refined soft sugars and could not be described as "raw." This view was supported by the Delegation of the US. The Delegation of Brazil expressed its reservation in this regard and its support for the proposal of Mauritius.

FOOD ADDITIVES AND CONTAMINANTS

Maximum Level of Sulphur Dioxide

55. The Committee debated the proposal for the reduction of sulphur dioxide level from 15mg/kg to 10mg/kg for white sugar, powdered sugar, dextrose anhydrous, dextrose monohydrate, powdered dextrose, fructose. The Delegation of the United States requested that the level of 15mg/kg should be maintained

⁴ CX/S 00/4, CX/S 00/4 Add.

because of the use of sulphur dioxide in the processing of sugar from maize. The Delegation of Portugal indicated that such amount had no technological effect and that some consumers might have some problems at higher level. The Committee took note that the Codex Committee on Food Additives and Contaminants (CCFAC) was considering this issue on a horizontal basis. There was no consensus to recommend to the Commission to reduce the level of sulphur dioxide to 10 mg/kg.

Heavy Metals

56. The Committee noted that the levels of arsenic and lead would be considered by the CCFAC and therefore no action was required at this stage.

METHODS OF ANALYSIS FOR INCLUSION IN THE STANDARD

57. The Committee expressed its appreciation to the Chairman of the *Ad Hoc* Working Group, Dr Roger Wood who introduced the Report of the *Ad Hoc* Working Group (see Appendix IV to this report) for the work done and agreed to the proposed actions, subject to endorsement by the Codex Committee on Methods of Analysis and Sampling. Those actions were as follows:

Section 6.1.3: Polarisation in Powdered Sugar

58. ICUMSA (1994) GS 2/3-1 to be maintained, after filtration if necessary to remove any anti-caking agent (endorsed as Type II method). A footnote to include: "Care needs to be taken if anti-caking agents such as starch are present as the method may then not be appropriate."

Section 6.8.1 Sulphur Dioxide in White Sugar, Plantation or Mill White Sugar, Soft White Sugar and Soft Brown Sugar, Powdered Sugar, Powdered Dextrose and Raw Cane Sugar

59. ICUMSA (1998) GS 2/3-35 / NMKL 135 /EN 1988-2 (1998) to be replaced by: ICUMSA (1998) GS 2/3-35 / NMKL 135 (1990) / EN 1988-2 (1998) (Type II method) and ICUMSA method (1998) GS2/7-33 (Type III method).

Section 6.10: Arsenic

60. AOAC 952.13 (Codex general method) or ICUMSA (1994) GS 2/3 – 25 to be replaced by: AOAC 952.13 (Codex general method) (Type II method), ICUMSA (1994) GS 2/3 - 25 (Type III method) and ICUMSA (1994) GS2/3-23 (Type III method).

Section 6.11 Lead

61. AOAC 997.15 - graphite furnace AA method (Type II method) or ICUMSA (1998) GS 2/3 - 24 (Type II method – identical to AOAC method) to be replaced by: AOAC 997.15 - graphite furnace AA method (Type II method) or ICUMSA (1998) GS 2/3 - 24 (Type II method – identical to AOAC method) and ICUMSA GS 2/1/3 - 27 (1994) (Type IV)

Section: Annex 2.2: Conductivity Ash In Fructose

62. ICUMSA (1994) GS 2/3 – 17 (Type I method) to be maintained.

Section: Annex 3: Invert Sugar Content

63. ICUMSA (1997) GS 2/3-5 (Type I method) to be maintained.

Section: Annex 3.2 Invert Sugar In Plantation Or Mill White Sugar (0.1% M/M)

64. ICUMSA (1994) GS 1/3/7 - 3 (Type I method) to be replaced by: ICUMSA GS 2-6 1998 (Type I method).

Section: Annex 7.1: Colour In White Sugar, Powdered Sugar, Plantation Or Mill White Sugar And Soft White Sugar

65. ICUMSA (1994) GS2/3-9 (Type I method) to be replaced by ICUMSA (1998)GS2-10 (Type I method)

STATUS OF THE PROPOSED AMENDMENTS TO THE REVISED STANDARD FOR SUGARS

66. The Committee unanimously agreed to advance the proposed amendments to the Revised Standard for Sugars to the 24th Session of the Codex Alimentarius Commission with the recommendation that the amendments be adopted at Step 5/8 (See Appendix III of this report).

OTHER BUSINESS AND FUTURE WORK (AGENDA ITEM 5)

67. The Delegation of Portugal, speaking on behalf of the European Union, indicated that "geographical situation" and "consumer preference" were also elements to be considered in the context of other legitimate factors.

68. The Committee agreed that the proposal of the Delegation of Thailand to elaborate the Code of Hygienic Practice for Honey should be referred to the Codex Committee on Food Hygiene in order to examine the necessity of its preparation.

FUTURE WORK

69. The Committee also agreed that as a result of discussions at its present session, its future work, subject of approval by the Codex Alimentarius Commission, would include the following:

- Consideration of Proposed Amendments to the Codex Standard for Sugars;
- Development of Standards for Unifloral Honeys;
- Completion of Part two of the Standard for Honey covering industrial uses.

ANNEX

SUMMARY STATUS OF WORK

Subject	Step	Action by	Document Reference (ALINORM 01/25)
Draft Revised Standard for Honey	8	Governments 24 th CAC	para.50 Appendix II
Proposed amendments to the Revised Standard for Sugars	5/8	Governments 24 th CAC	para. 66 Appendix III
Consideration of Proposed Amendments to the Codex Standard for Sugars (definition of Raw Cane Sugar)	1	47 th CCEXEC	paras 53, 69
Development of Standard for Unifloral Honey	1	47 th CCEXEC	para 69
Completion of Part two of the Standard for Honey covering industrial uses	1	47 th CCEXEC	para 69
Code of Hygienic Practice for Honey	-	33 rd CCFH	para. 68
Methods of Analysis and Sampling	-	23 rd CCMAS	paras 30, 47, 57 to 65

APPENDIX I

LIST OF PARTICIPANTS LISTE DES PARTICIPANTS LISTA DE PARTICIPANTES

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APPENDIX II

DRAFT REVISED STANDARD FOR HONEY

(at Step 8 of the Codex Procedure)

The Annex to this Standard is intended for voluntary application by commercial partners and not for application by Governments.

1. SCOPE

- 1.1 Part one of this Standard applies to all honeys produced by *Apis mellifera* bees and covers all styles of honey presentations which are processed and ultimately intended for direct consumption. Part two covers honey for industrial uses or as an ingredient in other foods. Part three covers honey produced by other species of honey producing bees.
- 1.2 Parts one and three of this Standard also cover honey which is packed for sale in bulk containers, which may be repacked into retail packs.

PART ONE

2. **DESCRIPTION**

2.1 Definition

Honey is the natural sweet substance produced by *Apis mellifera* bees from the nectar of plants or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which the bees collect, transform by combining with specific substances of their own, deposit, dehydrate, store and leave in the honey comb to ripen and mature.

- 2.1.1 <u>Blossom Honey</u> or <u>Nectar Honey</u> is the honey which comes from nectars of plants.
- 2.1.2 <u>Honeydew Honey</u> is the honey which comes mainly from excretions of plant sucking insects (*Hemiptera*) on the living parts of plants or secretions of living parts of plants.
- 2.2 Description

Honey consists essentially of different sugars, predominantly fructose and glucose as well as other substances such as organic acids, enzymes and solid particles derived from honey collection. The colour of honey varies from nearly colourless to dark brown. The consistency can be fluid, viscous or partly to entirely crystallised. The flavour and aroma vary, but are derived from the plant origin.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

- 3.1 Honey sold as such shall not have added to it any food ingredient, including food additives, nor shall any other additions be made other than honey. Honey shall not have any objectionable matter, flavour, aroma, or taint absorbed from foreign matter during its processing and storage. The honey shall not have begun to ferment or effervesce. No pollen or constituent particular to honey may be removed except where this is unavoidable in the removal of foreign inorganic or organic matter.
- 3.2 Honey shall not be heated or processed to such an extent that its essential composition is changed and/ or its quality is impaired

- 3.3 Chemical or biochemical treatments shall not be used to influence honey crystallisation.
- 3.4 Moisture Content
- (a) Honeys not listed below not more than 20%
- (b) Heather honey (*Calluna*) not more than 23%
- 3.5 Sugars Content
- 3.5.1 Fructose and Glucose Content (sum of both)

(a)	Honey not listed below	- not less than 60 g/100g
(b)	Honeydew honey,	- not less than 45 g/100g
	blends of honeydew honey with blossom honey	
3.5.2	Sucrose Content	
(a)	Honey not listed below	- not more than 5 g/100g
(b)	Alfalfa (<i>Medicago sativa</i>), Citrus spp., False Acacia (<i>Robinia pseudoacacia</i>), French Honeysuckle (<i>Hedysarum</i>), Menzies Banksia (<i>Banksia menziesii</i>),Red Gum (<i>Eucalyptus</i> <i>camaldulensis</i>), Leatherwood (<i>Eucryphia</i> <i>lucida</i>), Eucryphia milligani	- not more than 10 g/100g
(c)	Lavender (Lavandula spp),Borage (Borago officinalis)	- not more than 15 g/100g
3.6	Water Insoluble Solids Content	
(a)	Honeys other than pressed honey	- not more than 0.1 g/100g
(b)	Pressed honey	- not more than 0.5 g/100g
3.7	Electrical Conductivity	
(a)	honey not listed under (b) or (c), and blends of these honeys	- not more than 0.8 mS/cm
(b)	Honeydew and chestnut honey and blends of these except with those listed under (c)	- not less than 0.8 mS/cm

(c) <u>Exceptions</u> : Strawberry tree (*Arbutus unedo*), Bell Heather (*Erica*), Eucalyptus, Lime (*Tilia spp*), Ling Heather (*Calluna vulgaris*) Manuka or Jelly bush (*Leptospermum*), Tea tree (*Melaleuca spp*).

4. CONTAMINANTS

4.1 Heavy Metals¹

Honey shall be free from heavy metals in amounts which may represent a hazard to human health. The products covered by this Standard shall comply with those maximum levels for heavy metals established by the Codex Alimentarius Commission.

4.2 Residues of Pesticides and Veterinary Drugs

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

¹ These levels will be established in consultation between the CCS and CCFAC as soon as possible.

5. HYGIENE

- 5.1 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 recommended by the Codex Alimentarius Commission (CAC/RCP 1-1969, Rev 3-1997), and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice.
- 5.2 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).

6. **LABELLING**²

In addition to the provisions of the General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985, Rev 2-1999), the following specific provisions apply:

- 6.1 The Name of the Food
- 6.1.1 Only products conforming to Part one of the Standard shall be designated 'honey'.
- 6.1.2 For products described in 2.1.1 the name of the food may be supplemented by the term "blossom" or "nectar".
- 6.1.3 For products described in 2.1.2 the word "honeydew" may be placed in close proximity to the name of the food.
- 6.1.4 For mixtures of the products described in 2.1.1 and 2.1.2 the name of the food may be supplemented with the words "a blend of honeydew honey with blossom honey".
- 6.1.5 Honey may be designated by the name of the geographical or topographical region if the honey was produced exclusively within the area referred to in the designation.
- 6.1.6 Honey may be designated according to floral or plant source if it comes wholly or mainly from that particular source and has the organoleptic, physicochemical and microscopic properties corresponding with that origin.
- 6.1.7 Where honey has been designated according to floral or plant source (6.1.6) then the common name or the botanical name of the floral source shall be in close proximity to the word "honey".
- 6.1.8 Where honey has been designated according to floral, plant source, or by the name of a geographical or topological region, then the name of the country where the honey has been produced shall be declared.
- 6.1.9 The subsidiary designations listed in 6.1.10 may not be used unless the honey conforms to the appropriate description contained therein. The styles in 6.1.11 (b) and (c) shall be declared.
- 6.1.10 Honey may be designated according to the method of removal from the comb.
- (a) <u>Extracted Honey</u> is honey obtained by centrifuging decapped broodless combs.
- (b) <u>Pressed Honey</u> is honey obtained by pressing broodless combs.
- (c) <u>Drained Honey</u> is honey obtained by draining decapped broodless combs.
- 6.1.11 Honey may be designated according to the following styles:

² Subject to endorsement by Codex Committee on Food Labelling (CCFL)

- (a) <u>Honey</u> which is honey in liquid or crystalline state or a mixture of the two;
- (b) <u>Comb Honey</u> which is honey stored by bees in the cells of freshly built broodless combs and which is sold in sealed whole combs or sections of such combs;
- (c) <u>Cut comb in honey</u> or <u>chunk honey</u> which is honey containing one or more pieces of comb honey.
- 6.1.12 Honey which has been filtered in such a way as to result in the significant removal of pollen shall be designated <u>filtered honey</u>.
- 6.2 Labelling of Non-Retail Containers
- 6.2.1 Information on labelling as specified in The General Standard for the Labelling of Pre-packaged Foods and in Section 6.1 shall be given either on the container or in accompanying documents, except that the name of the product, lot identification and the name and address of the producer, processor or packer shall appear on the container.

7. METHODS OF SAMPLING AND ANALYSIS

The methods of sampling and analysis to be employed for the determination of the compositional and quality factors are detailed below:

7.1 Sample Preparation

Samples should be prepared in accordance with AOAC 920.180.

7.2 Determination of Moisture Content³

AOAC 969.38B / J. Assoc. Public Analysts (1992) $\mathbf{28}$ (4) 183-187 / MAFF Validated method V21 for moisture in honey.

- 7.3 Determination of Sugars Content⁴
- 7.3.1 Fructose and Glucose Content (sum of both)

Determination of sugars by HPLC - Harmonised Methods of the European Honey Commission, Apidologie – Special Issue **28**, 1997, Chapter 1.7.2

7.3.2 Sucrose content

Determination of sugars by HPLC - Harmonised Methods of the European Honey Commission, Apidologie – Special Issue **28**, 1997, Chapter 1.7.2

7.4 Determination of Water-insoluble Solids Content

J. Assoc. Public Analysts (1992) 28 (4) 189-193/ MAFF Validated method V22 for water insoluble solids in honey

7.5 Determination of Electrical Conductivity⁵

Determination of electrical conductivity - Harmonised Methods of the European Honey Commission, Apidologie – Special Issue **28**, 1997, Chapter 1.2

7.6 Determination of sugars added to honey (authenticity)

AOAC 977.20 for sugar profile,

AOAC 991.41 internal standard for SCIRA (stable carbon isotope ratio analysis).

³ These methods are identical

⁴ Subject to endorsement by CCMAS

⁵ Subject to endorsement by CCMAS

<u>ANNEX</u>

This text is intended for voluntary application by commercial partners and not for application by governments.

1. Additional Composition and Quality Factors

Honey may have the following compositional and quality factors:

1.1 Free Acidity

The free acidity of honey may be not more than 50 milliequivalents acid per 1000g.

1.2 Diastase Activity

The diastase activity of honey, determined after processing and/or blending, in general not less than 8 Schade units and in the case of honeys with a low natural enzyme content not less than 3 Schade Units.

1.3 Hydroxymethylfurfural Content

The hydroxymethylfurfural content of honey after processing and/or blending shall not be more than 40 mg/kg. However, in the case of honey of declared origin from countries or regions with tropical ambient temperatures, and blends of these honeys, the HMF content shall not be more than 80 mg/kg.

2. Methods of Sampling and Analysis

The methods of sampling and analysis to be employed for the determination of the additional compositional and quality factors set out in Section 1 of this Annex are detailed below:

2.1 Sample Preparation

The method of sample preparation is described in section 7.1 of the Standard. In the determination of diastase activity (2.2.2) and hydroxymethylfurfural content (2.2.3), samples are prepared without heating.

- 2.2 Methods of Analysis
- 2.2.1 Determination of Acidity

J. Assoc. Public Analysts (1992) 28 (4) 171-175 / MAFF validated method V19 for acidity in honey

2.2.2 Determination of Diastase Activity

2.2.6.1 AOAC 958.09

or

Determination of diastase activity with Phadebas - Harmonised Methods of the European Honey Commission, Apidologie – Special Issue **28**, 1997, Chapter 1.6.2

2.2.3 Determination of hydroxymethylfurfural (HMF) content

AOAC 980.23

or

Determination of hydroxymethylfurfural by HPLC - Harmonised Methods of the European Honey Commission, Apidologie – Special Issue **28**, 1997, Chapter 1.5.1

2.3. Literature references⁶

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PART TWO

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CCS asked CCMAS to consider retaining only those essential references.

[Honey for Industrial Uses or as an Ingredient in other Foods]

PART THREE

[Honey Produced by Other Species of Honey Producing Bees]

APPENDIX III

PROPOSED DRAFT AMENDMENT FOR THE STANDARD FOR SUGARS

(at Step 5/8 of the Codex Procedure)

DEFINITION OF RAW CANE SUGAR AND SOFT SUGARS

Raw cane sugar:

"partially purified sucrose, which is crystallised from partially purified cane juice, without further purification, but which does not preclude centrifugation or drying, and which is characterised by sucrose crystals covered with a film of *cane* molasses."

Soft white sugar:

"fine grain purified moist sugar, white in colour with a sucrose plus invert sugar content of not less that 97% m/m"

Soft brown sugar:

"fine grain purified moist sugar, light to dark brown in colour with a sucrose plus invert sugar content of not less than 88 %"

APPENDIX IV

REPORT OF THE AD HOC WORKING GROUP ON METHODS OF ANALYSIS

INTRODUCTION

The draft Standard for Sugars (see ALINORM 99/25) had been circulated for government and other interested parties to comment in 1999. The comments that were received and the revised draft Standard for Sugars collated and circulated to participants at the Seventh Session of the Codex Committee on Sugars (held London, from 9 to 11, February, 2000) as Conference Room Document 2. Amongst the comments were a number on the analytical methodology to be used in the Standard.

An *ad hoc* Working Group, the membership of which is given below, was convened at the Seventh Session of CCS at which the comments received were reviewed. The *ad hoc* Working Group made the recommendations given below for the methods of analysis provisions in the draft Sugar Standard.

MEMBERSHIP OF THE AD HOC WORKING GROUP ON METHODS OF ANALYSIS

The following countries and organizations participated in the Working Group: Cameroon, Canada, Germany, Hungary, India, the Philippines, Spain, the United Kingdom, the United States of America, CFFS, ICUMSA, WSRO.

RECOMMENDATIONS OF THE AD HOC WORKING GROUP ON METHODS OF ANALYSIS

The *ad hoc* Working Group discussed Conference Room Document 2 and other verbal suggestions made during its meetings.

The Working Group was also aware of the Codex requirements for laboratory quality standard requirements for laboratories involved in the import/export of foods.

GENERAL COMMENT

SUBMITTED COMMENTS

Canada: The proposed revisions include a statement that "Those countries proposing new methods for inclusion in the Standard for Sugars were invited to send them directly to the CCMAS for consideration for endorsement." It is Canada's position that methods must receive approval from the Sugar Committee before they are committed for endorsement by CCMAS. Therefore any new methods must be sent to the Sugars Committee first not CCMAS.

COMMENTS AND CONCLUSIONS OF WORKING GROUP: ACCEPTED BY WORKING GROUP

SECTION 6.1.3: POLARISATION IN POWDERED SUGAR

PRESENT REQUIREMENTS

ICUMSA (1994) GS 2/3-1, after filtration if necessary to remove any anti-caking agent (endorsed as Type II).

SUBMITTED COMMENTS

ICUMSA: With respect to measurement of Polarisation of powdered sugar to which starch has been added ICUMSA agrees to the addition of sentence "Where the anticaking agent is starch, removal by filtration or centrifugation may not be possible. So ICUMSA is developing another method for such agents."

CEFS: When starch is present, filtration is not always possible. Propose to add a sentence indicating that polarisation is not measurable for a technical reason in powdered sugar containing starch.

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Working Group accepts comments and suggests that a footnote to the Standard be given: "Care needs to be taken if anti-caking agents such as starch are present as the method may then not be appropriate." It was noted that the CEFS representative was of the opinion that the determination of powdered sugar containing starch was not always feasible but that the white sugar used to make the powdered sugar should meet the White Sugar Standard.

ACTION:

Maintain: ICUMSA (1994) GS 2/3-1, after filtration if necessary to remove any anti-caking agent. (endorsed as Type II).

Include a footnote: "Care needs to be taken if anti-caking agents such as starch are present as the method may then not be appropriate."

SECTION 6.8.1 SULFUR DIOXIDE IN WHITE SUGAR, PLANTATION OR MILL WHITE SUGAR, SOFT WHITE SUGAR AND SOFT BROWN SUGAR, POWDERED SUGAR, POWDERED DEXTROSE AND RAW CANE SUGAR

PRESENT REQUIREMENTS

ICUMSA (1998) GS 2/3-35 / NMKL 135 (1990) / EN 1988-2 (1998)

SUBMITTED COMMENTS

ICUMSA requests ICUMSA (1998) GS 2/3-35 be retained. This method is applicable horizontally in foods and also employs safe reagents

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Indian delegation suggested that ICUMSA method (1994) GS2-33 (rosaniline procedure) be also permitted as an alternative Type III method. This was accepted by the Working Group. However it was noted that this method employed potentially carcinogenic reagents and so should be used with care.

ACTION: Replace by

ICUMSA (1998) GS 2/3-35 / NMKL 135 (1990) / EN 1988-2 (1998) (Type II method) and

ICUMSA method (1994) GS2-33 (Type III method).

SECTION 6.10: ARSENIC

PRESENT REQUIREMENTS

AOAC 952.13 (Codex general method) or ICUMSA (1994) GS 2/3 – 25.

SUBMITTED COMMENTS

ICUMSA requests that in addition to methods listed suggest addition of ICUMSA (1994) GS2/3-23 (which is to become method ICUMSA (2000) GS2/3 - 23 in 2000.)

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Working Group accepted the ICUMSA request. It noted that the AOAC INTERNATIONAL method may be dated but that in future it was probable that for trace elements a performance based approach would be adopted by the Codex Alimentarius Commission (currently under discussion in CCMAS).

ACTION: Replace by

AOAC 952.13 (Codex general method) (Type II method), ICUMSA (1994) GS 2/3 - 25 (Type III method) and ICUMSA (1994) GS2/3-23 (Type III method).

SECTION 6.11 LEAD

PRESENT REQUIREMENT

AOAC 997.15 - graphite furnace AA method (Type II method) or ICUMSA (1998) GS 2/3 - 24 (Type II method – identical to AOAC method).

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Indian delegation suggested that ICUMSA GS 2/1/3 - 27 (1994) be included as a Type IV method. This was accepted by the Working Group.

ACTION: Replace by

AOAC 997.15 - graphite furnace AA method (Type II method) or ICUMSA (1998) GS 2/3 - 24 (Type II method – identical to AOAC method) and ICUMSA GS 2/1/3 - 27 (1994) (Type IV).

SECTION: ANNEX 2.2: CONDUCTIVITY ASH IN FRUCTOSE

PRESENT METHOD

ICUMSA (1994) GS 2/3 - 17 (Type I)

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Working Group accepted the CCMAS recommendation that this method replace ICUMSA (1994) GS 1/3/4/7/8 - 13.

ACTION: MAINTAIN

ICUMSA (1994) GS 2/3 - 17 (Type I)

SECTION: ANNEX 3: INVERT SUGAR CONTENT

GENERAL COMMENT

CEFS commented that ICUMSA is currently examining methods of invert sugar determination. It seems that current methods could be abandoned in several years and it will then be necessary to adapt the methods of analysis of the standard for sugars.

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Working Group noted this and anticipated that the determination of specific sugars (i.e. individually identified sugars, sucrose, fructose etc) would be required in future rather than the determination of "classical sugars" (i.e. total sugars determined by a non-specific procedures, e.g. Luff-Schoorl, Lane and Eynon etc). The development of specific chromatographic methods would be reported on in 2002 at the next Session of ICUMSA.

SECTION: ANNEX 3.1 INVERT SUGAR IN WHITE SUGAR (<0.04% M/M)

PRESENT METHOD

ICUMSA (1997) GS 2/3-5 (Type I).

SUBMITTED COMMENTS

ICUMSA requests that ICUMSA (1997) GS 2/3-5 be retained. This and a proposed titrimetric alternative

are to be tested against a new enzymic method during 23rd session of ICUMSA with appropriate Recommendations to be made in 2002.

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Working Group noted that it would be difficult to include more than one Type I method in the Standard. The decision on which method should be included in the Standard at its next revision should be made in the light of the ICUMSA work to be reported in 2002.

ACTION: Maintain

ICUMSA (1997) GS 2/3-5 (Type I)

SECTION: ANNEX 3.2 INVERT SUGAR IN PLANTATION OR MILL WHITE SUGAR (0.1% M/M)

PRESENT METHOD

ICUMSA (1994) GS 1/3/7 – 3 (Type I method).

COMMENTS AND CONCLUSIONS OF WORKING GROUP

The Indian delegation requested that ICUMSA GS 2-6 1998 (Modified Ofner Method) be given in the Standard because the range of application of the method was more appropriate for the concentrations given in the draft Standard and also was more scientifically sound (the lower limit for GS 1/3/7 - 3 is given as 0.25% by ICUMSA).

However, it was noted that this method had only been tentatively adopted by ICUMSA and is presently being further tested with a view to results being reported in 2002. When tested on sugars with low invert sugar content (0.017%) the method was not satisfactory; when tested on 0.04 to 0.09% levels it was found to be satisfactory. The Modified Ofner method was accepted by the Working Group as being most appropriate. It also noted that both methods cannot be included in the Standard as they are both Type I, empirical, procedures

ACTION: Replace by

ICUMSA GS 2-6 1998 (IType I method).

SECTION: ANNEX 7: COLOUR

GENERAL COMMENT

ICUMSA commented that ICUMSA Method (1998) GS2-10 is supported for application to white sugars only. For PMWS, powdered sugars and soft white sugars ICUMSA requests the retention of method ICUMSA (1994) GS2/3-9.

SECTION: ANNEX 7.1: COLOUR IN WHITE SUGAR, POWDERED SUGAR, PLANTATION OR MILL WHITE SUGAR AND SOFT WHITE SUGAR

PRESENT METHOD

ICUMSA (1994) GS2/3-9 (Type I method)

SUBMITTED COMMENTS

India recommends method ICUMSA (1998) GS2-10 is used for determination of colour in white sugars. See also ICUMSA comments above.

COMMENTS AND CONCLUSIONS OF WORKING GROUP

There was extensive discussion on this topic. The Working Group noted that the determination of colour in sugars is an empirical procedure (i.e. a Codex Type I method) so only one method may be given in the Standard. The Indian delegation now wished to apply ICUMSA GS 2 - 10 to all sugars listed in 7.1. However, on circulation of the draft Standard in 1999 the ICUMSA method GS 2 - 9 was given (see ALINORM 99/25). In response to that document the Indian delegation had commented on its inapplicability and wished the method to be replaced by ICUMSA (1998) GS2-10 (see CRD 2) for all white sugars whilst ICUMSA requested the replacement for only White Sugar.

Some members of the Working Group were therefore hesitant to recommend replacement of GS 2 - 9 by GS 2 - 10 for other sugars than White Sugar.

This topic had been extensively discussed at the last ICUMSA Session (Berlin, 1998). The recommendations at from that meeting were:

"The scope of Method GS 2/3 - 9 should state explicitly that the method is not applicable to samples other than [ICUMSA] white sugars.

Based on the good experiences with the former ICUMSA Method 4 (before 1978) and the results of the collaborative study of Method GS 2/3 - 10 (1997), this method is adopted as a new Official ICUMSA method GS 2 - 10 (1998)

It should be noted that results of Methods GS 2/3 - 9 and GS 2 - 10 are principally not comparable, and the method used should always be stated with the results."

The method GS 2 -10 is currently being prepared for publication by ICUMSA; the final text is not yet available.

ll members of the Working Group wished to replace GS 2/3 - 9 by GS 2 - 10 for white sugar, powdered sugar and soft white sugar (i.e. for sugars with < 60 ICUMSA Units).

The majority of the delegates present at the Working Group wished to replace GS 2/3 - 9 by GS 2 - 10 for plantation or white mill sugar.

The Plenary Session should note that this was the only point of contention within the Working Group.

ACTION; Replace by:

Colour in White Sugar, Powdered Sugar and Soft White Sugar

ICUMSA (1998) GS2-10 (unanimous agreement).

Colour in Plantation or Mill White Sugar

ICUMSA (1998) GS2-10 but noting that there was not unanimity on this recommendation.