

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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Organization

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Agenda Item 5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

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12 – 16 September 2016

Comments on the
Food additive provisions in Codex standards for processed fruits and vegetables

Comments Submitted by:
Ecuador, European Union, Iran, Japan, United States of America

Ecuador

1. STANDARD FOR CANNED CHESTNUTS AND CANNED CHESTNUT PUREE (CODEX STAN 145-1985)

Ecuador thanks the Secretariat of the Codex Alimentarius Commission for the opportunity to submit its comments on Food Additives in the Standard for Canned Chestnuts and Canned Chestnut Puree.

Justification:

Chestnuts and their by-products are not consumed in Ecuador. There are no food processing plants that produce canned or pureed chestnut; we have only two tariff items for chestnuts with the shell or shelled (fresh produce).

TABLE 1. TARIFF ITEMS FOR CHESTNUT (EQUADOR)

TARRIF ITEM	
Chestnut (<i>Castanea</i> spp):	
0802.41.00	With shell 25 Kg
0802.42.00	Shelled 25 Kg

Source: National Customs Service of Ecuador

Comments

1.1. There is no precise criterion issued to suggest food additives that act as a hardening agent for canned chestnuts and canned chestnut puree.

1.2. It is suggested that if Propylene Glycol Alginate and Aluminum Ammonium Sulfate are approved as additives in pickled fruits and vegetables, they should be listed in General Standard for Food Additives (CODEX STAN 192).

2. "STANDARD FOR PICKLED FRUITS AND VEGETABLES" (CODEX STAN 260-2007)

Ecuador wishes to thank Japan and the European Union for the opportunity to submit their comments on the possibility of including aluminum ammonium sulfate as a color fixative and propylene glycol as a stabilizer in the *Standard for Pickled Fruits and Vegetables*. We have the following comments:

Justification:

Commission regulation EU 1129/2011 of 11 November 2011, modifying Annex II of the European Parliament and Council Regulation CE 1333/2008, which establishes the European Union list of authorized food additives and their conditions of use in food. Propylene Glycol Alginate and Aluminum Ammonium Sulfate and Magnesium are mentioned therein.

Propylene Glycol Alginate is an additive used in fruit and vegetable preparations, except for preserves, at a dose not exceeding 5000 mg/Kg. The use of this additive is not specified for pickled fruits and vegetables.

Aluminum Ammonium Sulfate is used in candied, crystalized or glacé fruits and vegetables at a dose not exceeding 500 mg/kg. The use of this additive is not specified for pickled fruits and vegetables.

Comments:

a. Ecuador supports the use of these additives as long as their use and effects on pickled fruits and vegetables are scientifically justified with technical and analytical foundation.

The inclusion of Propylene Glycol Alginate and Aluminum Ammonium Sulfate as additives for pickled fruits and vegetables is scientifically justified with technical and analytical foundation for their use and effects on pickled fruits and vegetables.

European Union

The European Union (EU) would like to provide the following comments in reply to CL 2016/17-PFV:

Standard for Canned Chestnuts and Canned Chestnut Puree (CODEX STAN 145-1985)

The EU agrees with the need to provide information justifying the use of firming agents (including information on specific firming agents) in canned chestnuts and canned chestnut puree in order to consider if it is appropriate to include such use in CODEX STAN 145-1985.

Only if the technological need is demonstrated and agreed by the Committee it can then be considered whether a general reference to the GSFA or a list of firming agents in CS 145-1985 is appropriate. Generally, the EU prefers the development of a list of food additives, i.e. an approach which better reflects the needs of the foods falling under the commodity standards (especially where there is no one-to-one relationship with the corresponding much broader GSFA food category).

The EU does not have any information as regards the technological need/ justification for the use of firming agents in canned chestnuts and canned chestnut puree. However, the EU would like to note that there are some food additives which can be used in canned or bottled fruit and vegetables and which could also act as firming agents (INS 327 calcium lactate, INS 333 calcium citrates and INS 509 calcium chloride).

Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007)

Use of INS 523 aluminium ammonium sulfate as a colour retention agent/ firming agent

The EU does not support the use of aluminium ammonium sulfate as a colour retention agent/ firming agent. The EU would like to stress that a colour retention agent is a functional class which was not listed in CODEX STAN 260-2007. In the EU's view, colour retention agents are not necessary for products falling under the standard in question.

Aluminium ammonium sulfate was not listed in CODEX STAN 260-2007 and it could not be used according to that standard before the amendment made in 2015 (see the explanation below).

The EU would like to note that the Codex Committee on Food Additives (CCFA) amended the uses and use levels of aluminium-containing food additives in view of the revised JECFA PTWI in order to decrease the exposure to aluminium (see REP13/FA, para 86). Therefore, the use of aluminium-containing food additives should be avoided where possible and such use shall not go beyond what was agreed by the CCFA on safety grounds.

The EU would like to note that INS 523 aluminium ammonium sulfate is permitted for use in the GSFA category 04.2.2.3 at 520 mg/kg for use in pickled vegetables except for use in perilla in brine at 780 mg/kg. Whilst there are alternatives which should be preferred (i.e. other firming agents not containing aluminium) the current wording of Section 4 of CODEX STAN 260-2007 permits the use of aluminium ammonium sulfate as a firming agent for products falling into the category 04.2.2.3; therefore, no amendment of CODEX STAN 260-2007 is necessary for products falling into that category. However, the EU does not support any extension of use of aluminium ammonium sulfate to foods falling into other categories (i.e. 04.1.2.3., 04.1.2.10 or 04.2.2.7)

Use of INS 405 propylene glycol alginate as a stabilizer

The EU takes note that stabilizers are currently not listed among the functional classes permitted for use in CODEX STAN 260-2007 and that the use of propylene glycol alginate as a stabilizer was reported by one Codex member.

The EU considers that appropriate information has to be submitted to appraise and justify the technological need for stabilisers and in particular for propylene glycol alginate. The EU is not aware of the technological need for INS 405 propylene glycol alginate in pickled fruits and vegetables.

Iran

1- first of all ; Iranian committee recommend to eliminate the named food additives for pickled fruit & vegetables , but if other countries are accepted to use them, it would be recommended to determine acceptable criteria in "**codex stan 260**" for more clarification .

2- Related to canned chestnuts ;Iran do not have any production .

Japan

Japan would like to thank the Secretariat for giving us the opportunity to comment on food additive provisions (Aluminium ammonium sulfate) for pickled fruits and vegetables.

Japan proposes adding colour retention agent in the food additive provisions of the Codex standard for pickled fruits and vegetables (CODEX STAN 260-2007) as follows;

4. FOOD ADDITIVES

Acidity regulators, antifoaming agents, antioxidants, colours, **colour retention agents**, firming agents, flavour enhancers, preservatives, sequestrants, and sweeteners used in accordance with Tables 1 and 2 of the General Standard of Food Additives in the food category in which the individual pickled fruit or vegetable fall into (i.e., one of the following categories: 04.1.2.3, 04.1.2.10, 04.2.2.3, and 04.2.2.7) or listed in Table 3 of the General Standard are acceptable for use in foods conforming to this Standard.

(Rationale)

Aluminium ammonium sulfate (INS 523) is used as a colour retention agent for pickled vegetables in Japan. Aluminium (ion) forms a stable complex with anthocyanins contained in vegetables, which retains the colour of the product.

United States of America

GENERAL COMMENTS:

The United States supports using a general reference to the General Standard for Food Additives (GSFA) in the food additive sections of commodity standards. This is consistent with the guidance in Section II of the Codex *Procedural Manual*, which calls for committees to incorporate such a general reference in commodity standards, or to provide to the Committee on Food Additives a justification of why such a general reference would not be appropriate. (*Procedural Manual*, 24th Edition, Page 48)

A specific list of allowable food additives would not accommodate the differences in market preferences and market variety that exist for these commodities. Making a general reference would also allow for greater alignment and efficiency between the work of Codex Committee on Food Additives and Codex Committee on Processed Fruits and Vegetables and reduce the need for multiple reviews whenever there are changes in the GSFA.

SPECIFIC COMMENTS:

Standard for Canned Chestnuts and Canned Chestnut Puree (CODEX STAN 145-1985)

The canned/processed industry should have available the option of applying approved food additives used as firming agents. Although aluminum potassium sulphate (INS 522) was removed in the GSFA due to safety concerns, the technological need for firming agents should be maintained. The technological justification on the need for firming agents in the Codex Standard (CODEX STAN 145-1985) are the following (i) differences in specific densities of chestnut varieties, (ii) impact of geo-climatic factors on the texture of chestnuts, (iii) socio-cultural taste and preferences for firm or soft cooked chestnuts and for different thickness densities of chestnut purees and (iv) different cooking methods used.

Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007)

Color retention agent and stabilizers should be added to the list of functional classes included in the general reference to the GSFA. CODEX STAN 260-2007 contains a general reference to the GSFA that lists specific functional classes but does not include color retention agents or stabilizers, which is inconsistent with other Codex standards. The technical justification use of for color retention agents and stabilizers in this product is based on the following considerations: (i) the pickling process is usually accompanied by the fading of fruits' and vegetables' natural color and (ii) the need to stabilize the fruits and vegetables after pickling. Due to the wide range of fruits and vegetables covered by CODEX STAN 260-2007, the different innate characteristics of each fruit and vegetable and different pickling methods used, CCPFV would need to provide technological justification as to why INS 523 (aluminum ammonium sulphate) is the only appropriate color retention agent, and INS 405 (propylene glycol alginate) is the only appropriate stabilizer. A general reference to the GSFA is more appropriate because it provides flexibility to the trade to match the appropriate food additive to a product and/or pickling method.