

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4.3

CX/MAS 23/42/6 Add.1
ORIGINAL LANGUAGE ONLY
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

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REVIEW OF METHODS OF ANALYSIS IN CXS 234:
PROCESSED FRUITS AND VEGETABLES WORKABLE PACKAGE

Comments in reply to CL 2023/48/OCS-MAS

*Comments of Australia, Brazil, Colombia, Egypt, European Union, Iraq, Paraguay and
World Processing Tomato Council*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/48/OCS-MAS issued in April 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and presented in table format.

COMMENTS	
<p>With respect to the two questions:</p> <ol style="list-style-type: none"> 1. Australia believes the proposed revisions to CXS 234 in Appendix I of CX/MAS 23/42/6 can be endorsed, with some minor editorial amendments as listed under Specific Comments. 2. For clarity with respect to the affected commodities for certain processed fruits and vegetables, we believe they should remain listed in parenthesis under the “Processed Fruits and Vegetables” as shown in Appendix I. 	Australia
<p>Specific comments:</p> <ol style="list-style-type: none"> 1. Listing the commodities where the provision is specifically ‘allowed food additives’, ‘specified’, or ‘applies to’ in a commodity standard’ is simpler than listing every PFV commodity and good information for the analyst. For example, Benzoic acid and benzoates are allowed food additives for the following commodities: Jams, Jellies, Marmalades, pickled cucumbers, mango chutney, Coconut Milk and Coconut Cream. However, referral to CXS 192- Benzoates suggests a much broader list of PFV ‘FoodCatNo’ in which ‘MaxLevel’ could be applicable (making individual CXS 234 line entries per commodity/provision combination impractical), and while the NMKL 124 ‘Benzoic acid, sorbic acid and p-hydroxybenzoic acid esters-Liquid chromatographic determination in foods.’ method may have a ‘food’ scope, we wouldn’t like to suggest the method has specific validation data for Jams, Jellies, Marmalades, pickled cucumbers, mango chutney, Coconut Milk and Coconut Cream. Thus suggest a footnote attached to ‘Processed fruits and vegetables’ Subsection title – “The processed fruit & vegetable commodities listed in parenthesis suggests those where the relevant provision is either an allowed food additive’, specified’ or ‘applies to’ by a commodity standard. This is not an exhaustive list; and does not necessarily represent specific commodities included in method validation.” This footnote should also prompt CCMAS to update these details with any subsequent amendments. Listing the commodities should not be necessary for ‘General methods’. 2. Appendix 1, page 4, second line item. The Commodity/ provision combination - Processed fruits and vegetables/Lead method, could like ‘Tin’ have a Principle - ‘Flame Atomic Absorption Spectrophotometry’. 3. Appendix 1, page 4, fourth line item. With respect to ‘canned bamboo shoots’, pH, determined by AOAC 981.12, suggest this should be a separated line item instead of stating a commodity as an exception, see - ‘Processed fruits and Vegetables ((pickled cucumbers, table olives, processed tomato concentrates, preserved tomatoes, mango chutney, and aqueous coconut products except canned bamboo shoots, pH determined by AOAC 981.12). 4. Appendix 1, page 6, fifth line item. With Commodity/ provision combination - Aqueous Coconut Products/ Non-fat solids, the Method is ‘Two methods required to determine/calculate the required answer’ so the Separator ‘and’ should be used, thus specified as ISO 1211 IDF 1 and ISO 6731 IDF 21. 5. Appendix 1, page 11, sixth line item. With Commodity/provision – Raisins/ Mineral oil, can Codex Secretariat make the CAC/RM 51 and 52 available to allow assessment by endorsement WG. 	

Brazil appreciates the document prepared by the United States of America and thanks the opportunity to present the following comments:

- The CAC/RM method is no longer available and therefore must be replaced with available methods as proposed in the Appendix I:

Provision "Fill of glass containers": CAC/RM 46 with ISO 8106

Provision "Fill of metal containers": CAC/RM 45 with ISO 90-1

Provision "Drained weight": CAC/RM 44 with AOAC 968.30

Provision "Mineral impurities": CAC/RM 51 with ISO 762

- It was not possible to identify authorized use of additives expressed as calcium for processed fruits and vegetables. Thus, Brazil requests that the provision for calcium in CXS 192 be identified.

- The Procedural Manual states that preference should be given to set performance criteria according to the guidance established in the General Criteria for the Selection of Methods of Analysis using the Criteria Approach. Taking this into account, Brasil suggests establishing performance criteria for "benzoic acid", "lead", "sorbates", "tin" and "sulphur dioxide" as described in the table below.

Provision	Analyte	ML	LOD	LOQ	Minimal applicable range	Precision	Recovery	Recovery calculated by interpolation
		(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(%)	(%)	(%)
Processed fruits and vegetables (<u>Jams, Jellies, Marmalades, pickled cucumbers, mango chutney, Coconut Milk and Coconut Cream</u>)	Benzoic acid	1000	100	200	830,31 - 1169,69	11,3	95-105%	95-105%
Processed fruits and vegetables (canned fruits, canned vegetables, pickled cucumbers)	Lead	0,1	0,01	0,02	0,032 - 0,168	44	80-110%	80-110%
Processed fruits and vegetables (jams, jellies and marmalades, mango chutney, table olives)	Lead	0,4	0,04	0,08	0,18 - 0,62	36,7	80-110%	80-110%
Processed fruits and vegetables (preserved tomatoes, canned chestnuts and canned chestnuts puree)	Lead	0,05	0,01	0,02	0,028 - 0,072	44	60-115%	68,9-112,8%
Processed fruits and vegetables (<u>Jams, Jellies, Marmalades, pickled cucumbers</u>)	Sorbates	1000	100	200	830,31 - 1169,69	11,3	95-105%	95-105%
Processed fruits and vegetables Table olives	Tin	250	25	50	197,74 - 302,26	13,9	90-107%	90,8-106,7%
Dried apricots	Sulphur dioxide	1000	100	200	830,31 - 1169,69	11,3	95-105%	95-105%

Brazil

<p>Si se pueden ratificar las revisiones de la CXS 234 propuestas que figuran en el Apéndice I del documento CX/MAS 23/42/6, y Si, enviamos observaciones a través de correo electrónico.</p>	Colombia
<p>si los productos afectados para determinadas frutas y verduras elaboradas deben seguir figurando entre paréntesis en el marco de «Frutas y verduras elaboradas» como se muestra en el Apéndice I, o si la unidad 'producto–disposición' debe incluirse en líneas separadas. La respuesta es deben permanecer entre paréntesis no en líneas separadas y cada ítem se describe el método según el alimento.</p>	
<p>Egypt appreciates the work done in the document , and suggests the following notes :</p> <ul style="list-style-type: none"> • Separate the method for estimating the pH in a separate row in bamboo shoots example. • With regard to commodities that have been added in red and related to the determination of benzoic acid, calcium , and tin : it is suggested to add the phrase “for example or ... etc.” in the cell of commodity after the red modifications 	Egypt
<p>a) Whether the proposed revisions to CXS 234 in Appendix I of CX/MAS 23/42/6 can be endorsed</p> <p>The EUMS support the endorsement of the proposed revisions to CXS 234. and suggest to discuss the proposal to list certain processed fruits and vegetables in parenthesis under “Processed Fruits and Vegetables” in the Physical Endorsement Working Group.</p>	European Union
<p>b) Whether the affected commodities for certain processed fruits and vegetables should remain listed in parenthesis under the “Processed Fruits and Vegetables” as shown in Appendix I of CX/MAS 23/42/6, or should the commodity – provision pair be listed on separate lines?</p> <p>The EUMS suggest to discuss the proposal to list certain processed fruits and vegetables in parenthesis under “Processed Fruits and Vegetables” in the Physical Endorsement Working Group</p> <p>Several inconsistencies in the terminology used to describe the method principles, in particular in relation to work done during the review of the Dairy and the Cereals, pulses and legumes workable packages were observed and will be brought forward during the physical Working Group meeting. In particular, the EUMS recommend to harmonise throughout CXS 234-1999 how method principles such as ‘gravimetry’ for moisture determination (‘drying’ either with or without mentioning the temperature), and for ash determination (‘ashing’ or ‘incineration’ either with or without mentioning the temperature) are described. Furthermore, it is unclear why for the provision ‘fill of container’ the method principle is given as ‘weighing’ and not as ‘gravimetry’.</p>	
<p>Agree with proposed.</p>	Iraq
<p>Estamos de acuerdo con que el documento pueda pasar de tramite.</p>	Paraguay
<p>a) Si se pueden ratificar las revisiones de la CXS 234 propuestas que figuran en el Apéndice I del documento CX/MAS 23/42/6</p> <p>Considero importante unificar la forma de referencia para el principio AAS; por lo que proponemos que se unifique a "Atomic Absorption Spectrophotometry (Flame)" para todas las filas que hagan referencia al mismo.</p>	
<p>b) si los productos afectados para determinadas frutas y verduras elaboradas deben seguir figurando entre paréntesis en el marco de «Frutas y verduras elaboradas» como se muestra en el Apéndice I, o si la unidad 'producto–disposición' debe incluirse en líneas separadas.</p> <p>Consideramos que pueden seguir figurando los mismos.</p>	
<p>Whether the affected commodities for certain processed fruits and vegetables should remain listed in parenthesis under the “Processed Fruits and Vegetables” as shown in Appendix I of CX/MAS 23/42/6, or should the commodity – provision pair be listed on separate lines?</p>	World Processing

<p>THE WPTC is ok with most of the recommendations with the following comments:</p> <p>CALCIUM/LEAD/TIN We suggest to consider the IFU Recommendation n.6 (2000) about the new analytical method applied with the macro and microelements and heavy metals Calcium is usually determined in a multielementar analysis methodologies. ICP/MS/MS</p> <p>DRAINED WEIGHT: For preserved tomatoes it is important that both screen-size of the sieves and diameter of the same are considered as currently in the specific Codex standard- ex.Type ISO 3319; 1 , 2 R 20/3 R 2,8</p> <p>MINERAL IMPURITIES (SAND): OK with ISO 762:2011</p>	Tomato Council
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