CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 5, 7, 10 **ASIA20/CRD5**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Twentieth Session

New Delhi, India, 26-30 September 2016

COMMENTS OF JAPAN

Agenda Item 5

Regional Standard for Non-Fermented Soybean Products

The 47th Session of the Codex Committee on Food Additives (CCFA47) endorsed the food additives provisions for the standards as provided by the 19th Session of the FAO/WHO Coordinating Committee for Asia (CCASIA19) except the provisions for tocopherols (INS 307a,b,c), caramel II-sulfite caramel (INS 150b) and caramel IV-sulfite ammonia caramel (INS 150d) because the dietary intake associated with these maximum levels might exceed the respective ADI.

After CCFA47, Japan reinvestigated the actual use levels of the food additives that were not endorsed at CCFA47 by interviewing manufactures of soybean beverage and confirmed that tocopherols of 200 mg/kg work effectively in soybean beverage as antioxidant to keep quality for a long period. Therefore, Japan proposes that maximum use level of tocopherols in the Regional Standard for Non-Fermented Soybean Products be set at 200 mg/kg as shown below.

4.2.2 Composite/ flavoured Soybean Beverages and Soybean-based Beverages

INS No.	Name of Food Additives	Maximum Level
Antioxidant		
307a,b,c	Tocopherols	**200** ~~20000~~ mg/kg

Agenda Item 7

Recommendation 1

Activity 2.2.1

Japan would like to bring the issue of sustainability of scientific support to Codex to the attention of the Asian Members (REP15/CAC, para. 138-155).

Recognizing a chronic shortage of funds for provision of scientific advice, the 38th CAC supported an option to integrate the provision of scientific advice into the Joint FAO/WHO Food Standards Programme as far as financing is concerned to ensure the sustainability of scientific support to Codex as a long-term solution. In addition, the 39th CAC also called on Members to provide additional resources in such a way that would increase the funding of the scientific advice programme in a predictable manner until a long-term solution is found (Para. 221 REP16/CAC).

Recommendation 2

Activity 2.3.4

Japan notes that some such networks have been created, maintained and used for a long time. For example, GEMS/Food Programme and PulseNet for food borne pathogens were created in the WHO's framework, and have been maintained and used. At this moment, the Codex should first identify the existence of such networks and discuss how the Codex or member countries can use them for food safety and food trade. .

Recommendation 3

Japan is of the view that the appropriateness of using the indicators for measuring the activities, including indicators for activity 2.1.2 and 2.1.3, can be considered more appropriately during the course of drafting the Global Strategic Plan 2014-2019.

Recommendation 4

Japan prefers second bullet because on line platform could allow a more systematic information collection and ensure the transparency.

Recommendation 6

General Comment

Japan is of the opinion that the structure of the new SP should be based on that of SP 2014-2019 with necessary update and revision.

Specific Comments

Strategic goal 1: Establish international food standards that address current and emerging food issues

Japan believes that this Strategic Goal (SG) is the most essential part of the SP and should be kept as it is.

Objective 1.1: Establish new and review existing Codex standards, based on priorities of the CAC.

Japan is of the view that Codex should work primarily on issues related to protection of health of consumers while ensuring fair practices in the food trade. For spending more time on developing Codex Standards, which are crucially important for food safety and food security, “Criteria for the Establishment of Work Priorities” in the Procedural Manual should be strictly applied.

Objective 1.2: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Same comment as Objective 1.1

Objective 2.2: Achieve sustainable access to scientific advice.

Japan is of the view that, while encouraging the parental organizations on this activity, Members should consider financial support to the parental organizations on this activity. To this end, the FAO and WHO may have to have an agreed and transparent mechanism.

Objective 2.3: Increase scientific input from developing countries.

Robust data collection and generation from Asian region is very beneficial to all Asian members in order to reflect our national and regional situations in Codex Standards.

Objective 3.1: Increase the effective participation of developing countries in Codex.

Japan considers that this objective is also very important and wants to keep it as it is in the next SP.

Japan notes that activities under this objective are mainly associated with encouraging developing countries to participate in Codex.

Nevertheless, considering current situation about CTF 2, which principally doesn’t cover travel cost for developing countries to attend Codex Committees, it’s is not feasible to boost participation of developing countries. So, Japan would like to suggest an opposite approach to address this problem.

Japan believes that so many Codex meetings are held and this fact creates more financial burden for Codex Members than they can afford. If we streamline the Codex whole framework, e.g. consolidation of multiple commodity committees, we can reduce the burden of Members. In this context, Japan supports creation of the mechanism of managing the work of all the commodity committees (e.g., time intervals and meeting places taking into account the secretariat’s work load, the agreed common criteria of choice of commodities for the standard setting, balanced choice of commodity classes, inter-regional adjustment regarding the commodity work, etc) because it will make the commodity work more balanced and more effective. Under such a mechanism, commodity issues could be prioritized and worked out in time-bound manner.

Strategic goal 4: Implement effective and efficient work management systems and practices

Japan believes that this SG should be described in relation to Objective3.1 as mentioned above.

Objective 4.1: Strive for an effective, efficient, transparent, and consensus based standard setting process.

Japan is the view that Activity4.1.2, 4.1.3 and 4.1.5 overlap with SG3. To avoid this duplication we should decide whether either of two is deleted or integrating each activities into SG3, if this objective is kept in the next SG.

Objective 4.2: Enhance capacity to arrive at consensus in standards setting process.

It seems that every committee has their own method of advance for developing Codex Standard due to key person's skill especially chair person. Japan is of the view that we should try to resolve this issue by choosing a competent chair or, as a second choice, providing effective training for key persons.

Agenda Item 10

Comments on the Project Document

Japan is of the view that the scope of the standard should be specified enough to identify the commodity for accurate consideration of the *Criteria for the Establishment of Work Priorities (f): Number of commodities which need separate standards indicating whether raw, semi-processed or processed.* It is especially important for Japan because there are commodities that have similarities with Makgeolli; they are made from rice and have a cloudy appearance. In this light, the description of the scope of the standard written in the paragraph 1 of the project document is too generic to identify Makgeolli.

According to the discussion paper, the features of Makgeolli should be summarized as follows;

a) be basically made from rice, fermentation starter culture and water

b) has a variety of ingredients(grains or fruits other than rice)

c) be made by a simultaneous two-step fermentation process

d) features a cloudy appearance

e) be usually milky, but may show a variety of colour depending on the other ingredients

f) contain small amount of alcohol(3-8%)

g) includes a small amount of carbon dioxide

h) be sterilized/not be sterilized

There is a filtering process in making Makgeolli as described in the paragraph 9 of the discussion paper:

For Makgeolli, the filtering process is controlled so that solid matters originating from the main ingredients remain in the product.

Considering this description, the following feature should be incorporated into the project document.

i) be filtered in a controlled way so that solid matters remain in the product

Moreover, there is no explanation of "starter culture" in the project document. The starter culture, which is rephrased as "nuruk" in the project document of CCASIA19, seems to be one of the essential ingredients of Makgeolli. According to the project document of CCASIA19, nuruk is a source of microorganisms for saccharification and alcoholic fermentation. Characteristics of alcoholic drink depends largely not only on its ingredients but also components produced by microorganisms through a fermentation process therefore information about the following matters would be also necessary.

j) ingredients and manufacturing process of the starter culture

k) microorganisms in the starter culture

For these reasons, Japan requests the republic of Korea to add information about items i) to k) above to the paragraph 1 of the project document.

Comments on the Discussion Paper

In response to the request from CCASIA19, the republic of Korea made an investigation into products that may be similar to Makgeolli, as referred in the forepart of the paragraph 9 of the discussion paper. Japan has provided information about the products which should be taken into consideration for the investigators from the republic of Korea.

Although some of the information has been incorporated in the paragraph 9, there are some descriptions to be revised.

Comments are presented in **underlined Bold font** (addition) and ~~strikethrough font~~ (deletion).

Review on the similar products in the region, Paragraph 9

Japan: **<u>There are two kinds of products comparable to Makgeolli; Nigorizake and Doburoku.</u>**

a) ~~Unlike Makgeolli, which is categorized as a cloudy type of rice-fermented beverage in the Republic of Korea, Nigorizake in Japan is categorized just like Sake and as a clear type of rice-fermented beverage.~~ **Nigorizake is a kind of Sake. It is made from steamed rice, koji(culture of a koji mold on steamed rice) and potable water. These ingredients are mixed and fermented through a simultaneous two-step fermentation. The major part of manufacturing process of Nigorizake is similar to Sake, however, there is a difference in a filtering process.** For ~~Makgeolli~~**Nigorizake**, the filtering process is controlled so that solid matters originating from the main ingredients remain in the product **whereas refined Sake goes through fine filtering process. A typical Nigorizake contains from 5 to 18 % alcohol.** ~~Nigorizake, on the other hand, involves a very fine filtering process which produces a clear type of Sake, to which solid matters are added separately afterwards. Due to this difference in manufacturing process, these two products differ in alcohol content, taste, flavour and components.~~ We are unable to confirm the exact production or trade volume of Nigorizake, but the production is estimated to be only about 1~2% of the total output of sake (539,263 kℓ, Euromonitor 2015).

b) Doburoku is a cloudy alcoholic drink which is also similar to Sake and Nigorizake in its ingredients and basic manufacturing process. However, unlike Sake and Nigorizake, there is no filtering process in Doburoku making therefore it contains whole grains of rice and koji. A typical Doburoku contains from 3 to 20 % alcohol.

The most significant feature of these two kinds of products is a fermentation microorganism. Almost all manufactures of these products in Japan have traditionally made use of a mold of the genus Aspergillus for saccharification process, and a yeast of the genus Saccharomyces for alcoholic fermentation process. Due to the difference in their microorganism, varieties of ingredients and details of manufacturing process, these two products in Japan differ in taste, flavour and components from Makgeolli.