

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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**Agenda Item 3**

**CX/CPC 01/3-Add. 2**  
**September 2001**  
**ORIGINAL LANGUAGE ONLY**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON COCOA PRODUCTS AND CHOCOLATE**

**Nineteenth Session**

**Fribourg, Switzerland, 3 - 5 October 2001**

### **PROPOSED DRAFT STANDARD FOR CHOCOLATE AND CHOCOLATE PRODUCTS AT STEP 5**

- **GOVERNMENT COMMENTS AT STEP 5 ON THE PROPOSED DRAFT STANDARD FOR CHOCOLATE AND  
CHOCOLATE PRODUCTS  
(Circular Letter CL 2001/23 CPC)**

#### **Governments and international organizations:**

**India, Malaysia, Mexico, Thailand, European Community, COPAL**

**India**

No. P. 16016/16/2001-PH (Food)  
Directorate General of Health Services

Nirman Bhavan, New Delhi-110011  
Dated the 26<sup>th</sup> September 2001

To

Ms. Awilo Ochieng-Pernet  
International Standards,  
Federal Office of Public Health,  
CH-3003 Bern,  
**Switzerland**

Fax: +41 31 322 95 74) (E-mail: [awilo.ochieng@bag.adnub.ch](mailto:awilo.ochieng@bag.adnub.ch))

***Subject: 19<sup>th</sup> Session of Codex Committee on Cocoa Products and Chocolate Fribourg, Switzerland, 3-5 October 2001.***

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Madam,

Kindly find enclosed the views of the Government of India on the different agenda items for consideration in the 19<sup>th</sup> Session of the Codex Committee on Cocoa Products and Chocolate to be held from 3-5 October, 2001 at Fribourg.

Thanking you,

Yours faithfully,

(Dr. S. R. Gupta)  
Assistant Director General (PFA) &  
Liaison Officer National Codex Committee

Copy with compliments to:

1. Chief Joint FAO/WHO Food Standards Programme,  
FAO Via delle Terme di Caracalla 00100 Rome Italy.  
(Fax: 39 06 5705 4593) (E-mail: [codex@fao.org](mailto:codex@fao.org))
2. FAO Representative in India and Bhutan, 55 Max Mullar Road, 110003  
(Fax: 4620115) (E-mail: [FAO-IND@field.fao.org](mailto:FAO-IND@field.fao.org))

(Dr. S. R. Gupta)  
Assistant Director General (PFA) &  
Liaison Officer National Codex Committee

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# Codex Alimentarius Commission

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON COCOA PRODUCTS AND CHOCOLATE**

*Nineteenth Session*

*Fribourg, Switzerland, 3 - 5 October, 2001*

**INDIA'S COMMENTS:**

**AGENDA ITEM NO. 2: MATTERS REFERRED BY THE CODEX ALIMENTARIUS  
COMMISSION AND OTHER COMMITTEES**

A. Twenty Fourth Session of the Codex Alimentarius Commission Agenda Item No. 2:

**Lead level in Cocoa Butter**

India supports the level of 0.5 mg/kg for lead in Cocoa Butter as recommended by Codex Commission.

**Draft Revised Codex Standards for Cocoa Powders**

India supports the level of 2 mg/kg for lead in cocoa powders as suggested by Codex Commission.

**AGENDA ITEM No. 3: PROPOSED DRAFT STANDARDS FOR CHOCOLATE  
AND CHOCOLATE PRODUCTS**

**2. DESCRIPTION AND ESSENTIAL COMPOSITION FACTORS**

**2.1 CHOCOLATE TYPES:**

Addition of vegetable fat:

Codex Commission has already circulated the Government of India's comments. However, India suggest the following:

- a. Word "Edible" is required to be added before "vegetable fat". Therefore, "vegetable fat" should be read as "edible vegetable fat".
- b. The use of edibles oils / fats should not be restricted to one vegetable fat /oils only. Blending of oils is necessary to develop the CBE, compatible to cocoa butter.
- c. There is a need to develop the methods of analysis and detection of edible vegetable fats / oils in chocolate.

**6.1: NAME OF THE FOOD**

**6.1.2:** India supports the removal of square brackets.

**6.1.8 Use of the term Chocolate**

India suggest that this Para should remain in square brackets since it needs further discussion to know the actual purpose behind this.

**6.2 : DECLARATION OF MINIMUM COCOA CONTENT**

India supports the removal of square brackets.

**6.3: NET CONTENT**

India suggests replacing 50 gms. by 10 gms.

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## **Malaysia**

**COMMENTS FROM MALAYSIA**  
**CODEX COMMITTEE ON COCOA PRODUCTS AND CHOCOLATE**  
**19<sup>TH</sup> SESSION**  
**FRIBOURG, SWITZERLAND, 3 – 5 OCTOBER 2001**

**CL 2001/23-CPC**

**ALINORM 01/14**

**Appendix V**

**Proposed Draft Standard for Chocolate and Chocolate Products at Step 5**

In response to CL 2000/46-CPC and ALINORM 01/14 (Paras 47–74) as well as Appendix V, Malaysia appreciates that our comments were taken into consideration by the CCCPC as reflected in the document CX/CPC 01/3.

However, Malaysia notices that the title of the draft standard is not consistent with ALINORM 01/14 in that the word “Revised” was not included in documents sent out under CL 2001/23-CPC. In this regard, Malaysia would like to suggest an editorial correction by inserting the word “Revised” after the word “Draft”. This correction should cover all texts that are relevant.

Mexico

09/24/01 08:30 TEL 57299480

DGN. ASUNT. INTERN

01



Dir	Stv Dir	OeG	S+A	LM-G	S+C
SC	Bundesamt für Gesundheit				HM
SC Stv	25. SEP. 2001				Biblio
Info					DM
P+O					Biol
Int					Pharm
S+L					9 Chem
R	GFB	Epi	LMW	VLM	Str



Dirección General de Normas  
Exp. 312.08.CPC.CM.21  
Of. 312.08.0406.01

Estado de México, 2001-09-21

**Sra. Awilo Ochieng Pernet,**  
Punto de Contacto del Codex Alimentarius  
Berna, Suiza.

La Dirección General de Normas, como punto de Contacto Oficial ante la Comisión del Codex Alimentarius (CAC), somete a su consideración las observaciones del Gobierno de México a los documentos que servirán de base para la **Trigésima Novena Reunión del Comité sobre Productos del Cacao y el Chocolate** que se celebrará en Friburgo, Suiza, del 3 al 5 de octubre de 2001. Se sugieren las siguientes modificaciones:

México solicita que en dicha reunión se pida que sea incluido el producto "Chocolate para Mesa" en la Norma de "Chocolate y Productos de Chocolate", actualmente en paso 5. Se hace dicha solicitud ya que existen diferentes países que cuentan con este tipo de producto que tienen un gran historial, además de ser de alto consumo regional y que en un momento dado puede llegar a importarse o bien exportarse.

Se anexa información para dar soporte al documento.

De este modo se refrenda la posición de México ante el proyecto de norma para el chocolate y productos del chocolate, documento CL 2000/46-CPC. Apéndice V.

1. En el inciso 2.1.3 se propone que el contenido de extracto seco magro de cacao sea 4,5%, por lo menos.
2. En el inciso 2.2, dice: "...técnica de mezcla, extrusión y endurecimiento...", se propone que diga: "...técnica de mezcla, endurecimiento y/o extrusión...".
3. En el inciso 2.3, dice: "...en las secciones 2.1 ó 2.4 (salvo el chocolate a la taza)...", se propone que diga: "...en las secciones 2.1 y 2.4 (salvo el chocolate a la taza y el chocolate para mesa)...".

Nota: Nuestro país propone la inclusión del chocolate para mesa cuya definición iría en el inciso 2.4.4.

4. En el inciso 2.4.1, dice: "...salvo el chocolate a la taza...", se propone que diga "...salvo el chocolate a la taza y el chocolate para mesa".
5. Se solicita que se incluya en la tabla de composiciones de chocolate al chocolate para mesa, bajo la siguiente definición y composición.



**2.4.4. Chocolate para Mesa:** es el chocolate no refinado que cumple con un contenido mínimo de 20% de sólidos totales de cacao y donde la granulometría del edulcorante natural es mayor a 70 micras.

El chocolate para mesa se puede denominar también como chocolate para mesa semiamargo y amargo, donde el contenido mínimo de sólidos totales de cacao cambia a 30 y 40% respectivamente.

	Mante ca De Cacao	Extracto Seco Magro de Cacao	Extracto Seco Total de Cacao	Grasa Lácte a	Sólidos Totales de Leche	Combinación de Sólidos de Cocoa y Leche
<b>2.4.4.1. Chocolate para mesa</b>	≥ 11	≥ 9.0	≥ 20			
<b>2.4.4.2. Chocolate para mesa Semiamargo</b>	≥ 15.6	≥ 14	≥ 30			
<b>2.4.4.3. Chocolate para mesa Amargo</b>	≥ 22	≥ 18	≥ 40			

6. En el punto 3.7, se solicita incluir la mezcla de tocoferoles con un nivel máximo de 300 mg/Kg de grasa.

7. Se propone el manejo de una disposición general con relación al uso de leyendas precautorias, cuando se utilicen edulcorantes.

Adicionalmente, se solicita evaluar la conveniencia de usar leyendas precautorias cuando los productos objetos de este documento contengan alcohol etílico o bebidas alcohólicas.

8. Se está de acuerdo en la eliminación de los corchetes en el inciso 6.1.8. siempre y cuando aquellos productos que utilicen la palabra chocolate y que no cumplan con la composición establecida en el inciso 2, antepongan a la palabra chocolate la de "sabor a/de", quedando: "sabor a/de chocolate".

09/24/01 08:30 TEL 57299480

DGN. ASUNT. INTERN

03



### Información Soporte

La proposición de nuestro país en incluir dentro de la clasificación de chocolate al **CHOCOLATE PARA MESA**, se basa fundamentalmente en dos grandes consideraciones:

La primera y muy importante es porque a raíz del descubrimiento de América, México dio a conocer al mundo el cacao el cual dentro de las culturas: Olmeca, Maya, Tolteca y Azteca y en casi todas las culturas de los antiguos pueblos de Mesoamérica, se utilizaba y le reconocían propiedades casi divinas; el cacao fue utilizado como moneda en aquellos tiempos y según las leyendas era de origen divino, por lo que podemos concluir que es un patrimonio mundial.

La Bebida que con el Cacao Molido tomaban nuestros antepasados no varía en mucho al Chocolate para Mesa, salvo la inclusión del azúcar.

La segunda y no menos importante, es la elaboración de este tipo de Chocolate que se da en Países como México, Colombia, Costa Rica, Venezuela, Cuba, Puerto Rico y en casi toda Latinoamérica. Debido a que es un producto regional, la inclusión de este producto en la norma permitiría un mayor desarrollo del rubro en la región, y fomentaría un aumento en el intercambio de la región hacia otros destinos.

El chocolate para mesa varía del chocolate a la taza español en que nuestro producto se elabora partiendo de un cacao que no es fermentado sino solamente secado, ya sea al sol o mediante maquinaria y no lleva harinas; es una mezcla de la pasta de cacao con azúcar, la cual tiene una granulometría especial, su contenido de sólidos de cacao es lo suficientemente elevada que lo pone a la altura de los mejores chocolates del mundo.

Tan sólo en nuestro país la producción alcanza los niveles de 50,000 toneladas anuales y de ellas se exportan más de 1,500 toneladas anuales sobre todo a los Estados Unidos de Norteamérica y al Canadá.

Reciba un cordial saludo.

Atentamente

**Carlos Ramón Berzunza Sánchez.**  
 Director de Asuntos Internacionales.

JALZ/OMMF/IRSD\*



**Thailand**



No.0707/C 671

Thai Industrial Standards Institute  
Ministry of Industry  
Rama VI Street, Bangkok 10400  
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Tel:(662)2461993  
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E-mail: Metanee@tisi.go.th

26 September B.E.2544 (2001)

Dear Madam,

Please refer to CL2000/46-CPC requesting for comments on Proposed Draft  
Standard for Chocolate and Chocolate Products

We are pleased to enclose herewith the Resolution of the National Codex Alimentarius Committee  
of Thailand.

Yours sincerely  
Metanee Sukontarug  
(Metanee Sukontarug)  
Director  
Office of the National  
Codex Alimentarius Committee  
for Secretary-General  
Thai Industrial Standards Institute

Mrs.Eva Zbinden  
International Standard ,  
Swiss Federal Office of Public Health  
CH-3003  
Bern  
SWITZERLAND

CC. The Secretary  
Joint FAO/WHO Food Standards Programme  
FAO, via delle Terme di Caracalla  
00100 Rome  
ITALY

**THE RESOLUTION OF THE NATIONAL CODEX ALIMENTARIUS COMMITTEE OF THAILAND**

**PROPOSED DRAFT STANDARD FOR CHOCOLATE AND CHOCOLATE PRODUCTS.**

We have comments as follows :

**Section 6.1.2**

- We proposed that the labelling for chocolate products with sweetener in which sugar was partly substituted with sweeteners should be included term “partly” as follows:

“ When sugar is fully or partly substituted with sweeteners, an appropriate declaration should be included in the designation of the chocolate ”

- We proposed that the Labelling provision concerning the addition of vegetable fats other than cocoa butter not exceed 5% of the finished products may indicated as follows:

1.1 When cocoa butter is substituted with vegetable fat, a declaration should be indicated on the label in association with the name and/or the representation of the product.

1.2 When vegetable fat is added other than minimum cocoa butter content, a declaration of the vegetable fat should be included in the list of ingredients.

**Section 3 Food Additives**

**3.5 Sweeteners**

We would like to inform that prohibition of Cyclamic acid and its Na and Ca Salts was regulated according to Thai Food Law.

## **EUROPEAN COMMUNITY**

**Brussels, 25 September 2001**

### **EUROPEAN COMMUNITY COMMENTS**

***ON CODEX CIRCULAR LETTERS CL 2000/46 –CPC AND CL 2001/23-CPC***

#### **Draft Codex Standard for Chocolate and Chocolate Products (at step 5)**

The European Community congratulates the Committee with the progress made with this draft in the meeting of 2-4 November 2000, and would like to present the following comments with regard to this draft.

##### **SECTION 1. SCOPE.**

The first sentence of this section should read :

The standard will apply to all chocolate and chocolate products intended ~~for sale to consumers~~ for human consumption.

##### **SECTION 2. DESCRIPTION AND ESSENTIAL COMPOSITION FACTORS**

In order to cover effectively all products placed on the market in individual countries, the European Community proposes the inclusion in section 2.4. "Other chocolate products" a subsection 2.4.4. with the name "Other types of chocolate products" which permits to cover any products not mentioned elsewhere.

##### **On section 2.1.2. "Sweet Chocolate"**

The European Community is of the opinion that the Standard should concentrate on the main types of chocolate : dark, milk and white chocolate that are traded internationally and then make reference to other chocolate/chocolate products in a separate list. Therefore, the European Community proposes to delete the category « sweet chocolate » from the Standard. The European Community is looking into the possibility of establishing a list of products concerning chocolate types which are not explicitly mentioned in the Codex Standard in order to help consumers not to be misled when these products are marketed. »(see hereafter the comments on section 2.4.4). If appropriate sweet chocolate could be mentioned in that list.

**On section 2.1.4. “Milk Chocolate”**

The European Community can agree with the requirements set for the 3 products mentioned under this category (2.1.4.1. Milk chocolate; 2.1.4.2. Family milk chocolate ; 2.1.4.3. Milk couverture chocolate); the brackets concerning the minimum % of milk fat should be removed and replaced by dashes.

The European Community however proposes to establish for the products that correspond to definitions of sections 2.1.4.1 (milk chocolate) and 2.1.4.2 (family milk chocolate) a content of total fat (cocoa butter and milk fat) of minimum 25 %, as for these products there is no minimum cocoa butter content provided. Table 1 of the standard should be completed accordingly.

The European Community proposes to complete table 1 and to add a new column in Table 1: « Total Fat (Cocoa butter and Milk Fat) content.

**On section 2.1.5 “Cocoa butter confectionery/“White chocolate”**

The European Community can agree with the requirements set this category as far as the brackets concerning the minimum % of milk fat are removed and be replaced with dashes.

**On section 2.2. “Vermicelli and Flakes (Drops, Shavings)**

The European Community proposes to draft the first sentences of this section as follows :

“Vermicelli and Flakes (Drops, Shavings) are cocoa products obtained by a mixing, extrusion, and hardening technique which gives unique, crisp textural properties to the products. Vermicelli are presented in the form of short, cylindrical grains and flakes in the form of small flat pieces. The general requirements referred to in the first and second paragraph under section 2.1. “Chocolate types” are applicable.”

This change ensures that the basic requirements referred in these paragraphs apply also for chocolate in the form of vermicelli and flakes.

**On section 2.2.2 “Milk chocolate vermicelli/flakes”**

The European Community proposes to introduce a minimum total fat content of 12%. For this category no minimum cocoa butter content is provided. Table 1 of the standard should be completed accordingly.

The European Community proposes to adjust the proposed minimum milk fat into 3.5% milk fat.

**Section 2.4. « Other Chocolate Products »**

The European Community would like to ask Codex to align the FR version of the Standard – Section « Other Chocolate Products » as follows : « Autres produits de chocolat

**On section 2.4.1. “A chocolate or Praline”**

The European Community proposes to add at the end of the proposed description :

“... as defined under sections 2.1. and 2.4. with the exception of chocolate a la taza and of chocolate familiar a la taza”.

**On section 2.4.2.1 “Gianduja chocolate” (“Chocolat aux noisettes Gianduja”)**

The European Community is of opinion that the title of this section should be changed to : “*Gianduja nut chocolate*”. The table 1.(2/2) in the standard should incorporate this change.

The European Community is of opinion that the description of this product needs to be completed by adding at the end :

“ ... not less than 20 g of hazelnuts and not more than 40g of hazelnuts. The following may be added:  
- (a) milk and/or dry milk solids obtained by evaporation, in proportion such that the finished product does not contain more than 5% dry milk solids ;  
- (b) almonds, hazelnuts and other nut varieties, either whole or broken, in such quantities that, together with the ground hazelnuts, they do not exceed 60% of the total weight of the product”.

If the complements under (a) or (b) would not be acceptable to the Committee, the standard should provide that requirements with regard to addition of other ingredients can be provided by the authority having jurisdiction in accordance with applicable legislation.

**On section 2.4.2.2 “Milk Gianduja chocolate” (“Chocolat au lait et aux noisettes Gianduja”)**

The European Community is of opinion that the title of this section should be changed to : “*Gianduja nut milk chocolate*”. The table 1.(2/2) in the standard should incorporate this change.

The European Community is of opinion that the description of this product needs to be completed by adding at the end :

“ ... not less than 15 g of hazelnuts and not more than 40g of hazelnuts.  
Almonds, hazelnuts and other nut varieties may also be added, either whole or broken, in such quantities that, together with the ground hazelnuts, they do not exceed 60% of the total weight of the product”.

If the complements with regard to addition of almonds, hazelnuts and other nut varieties would not be acceptable to the Committee, the standard should provide that requirements with regard to addition of other ingredients can be provided by the authority having jurisdiction in accordance with applicable legislation.

**On sections 2.4.3.1. “Chocolate a la taza” and 2.4.3.2 “Chocolate familiar a la taza”**

The European Community proposes to add at the end of the two descriptions :

“... flour and/or starch from wheat, rice or maize”.

### **Addition of a new section 2.4.4. Other types of chocolate products**

As explained in our comments on section 2, it is necessary to provide in a separate section a provision concerning chocolate types, which are not explicitly mentioned in the Codex Standard. Such section is necessary as the proposed scope of the standard covers *all* chocolate and chocolate products.

The European Community proposes that this section would read as follows:

#### **“2.4.4. Other types of chocolate products**

The authority having jurisdiction may define and characterise in accordance with applicable legislation other types of chocolate which are not provided for in sections 2.1 to 2.4.3., such as :

- cream chocolate ; (milk fat content not less than 5.5%)

-skimmed milk chocolate ; (milk fat not greater than 1%)

- etc.”

The introduction of such section would permit Member Countries to continue regulating certain chocolate types, which are not regulated at the international level in the Codex standard. The previous version of the draft Codex Standard, discussed in the Committee in November 2000, provided cream chocolate and skimmed milk chocolate as milk chocolate subtypes. It is suggested that in this section also the type “sweet chocolate” would be mentioned.

### **SECTION 3. ADDITIVES**

The European Community would like to propose the following changes and additions to the table of food additives.

#### **Point 3.4 Sweeteners**

The draft standard lists several sweeteners for use in chocolate, vermicelli and flakes, filled chocolate and other chocolate products. The use of sweeteners is justified for the production of energy-reduced food, non-cariogenic foodstuffs or food without added sugars. Therefore, the proposed uses should be in products without any added mono- or disaccharides or any other foodstuff used for its sweetening properties or in energy-reduced products, for which an energy value is reduced by at least 30% compared with the original foodstuff or a similar product. The European Community would like to propose the following text to be added in the column on product reference: “with no added sugar or energy-reduced”.

#### **Point 3.7 Antioxidants**

The draft standard lists several antioxidants for use in cocoa butter confectionery and in white chocolate. The European Community would like to question the need for these additives in the said products and propose their deletion.

### **SECTION 4. CONTAMINANTS**

The 33<sup>rd</sup> CCFAC decided not to endorse maximum levels for arsenic or lead. These have to be considered within the framework of Codex General Standard for Contaminants and Toxins in food. The European Community fully agrees with this approach.

The European Community's view is that the same maximum level for lead (0.1 mg/kg) should apply to all kinds of vegetable oils and fats, including cocoa butter.

For chocolate and chocolate products, the European Community could eventually accept a slightly higher maximum level for lead as a temporary measure, in order to protect consumers and in particular children.

This maximum level should be considered by producer countries as a temporary level, as the CCFAC will determine at a later stage the appropriate maximum level based on evidence submitted on the level to be considered as being "as low as reasonably achievable (ALARA)" applying good practice and to provide a high level of public health protection. »

Copper is not to be considered as a contaminant but a quality parameter. Any standard on copper should be addressed under the section 2 "Description and essential composition factors".

## SECTION 6. LABELLING

### 6.1. Name of Food

#### On section 6.1.2

The European Community proposes to delete the text in square brackets : ~~{ if the amount .....sweetened with aspartame }~~

In the European Community the following declarations are made when sugar is fully or partially substituted with sweeteners :

- in its actual name the product should refer to sweeteners (chocolate with sweetener in the name or next to the name)
- in the list of ingredients under the heading additives the specific name of the sweetener preceded by the group of sweeteners should be stated
- use of some sweeteners are subject to compulsory warning on the labels (p.ex. aspartame)
- where it is a full replacement, it should read : X chocolate with sweeteners
- where it is a partial replacement, it should read : X chocolate with sugar and sweeteners

#### On section 6.1.3. Cocoa butter confectionery/White chocolate .

The European Community proposes that the title should be reversed to 'White chocolate/ Cocoa butter confectionery' in order to be in line with other proposed changes concerning white chocolate.

The name "Cocoa butter confectionery" is not common within the European Community and not authorised by E.U. legislation. The current drafting of this section would imply that products with this designation would have to be accepted. The European Community would therefore propose the following text:



Products described under Section 2.1.5 of this Standard and complying with the appropriate requirements of this Section shall be designated “Cocoa butter confectionery” or “White chocolate” as prescribed by the authority having jurisdiction

**On section 6.1.8. Use of the term chocolate**

The European Community can accept this section subject to the following re-drafting:

Products not defined under this Standard, and where the taste is derived from non-fat cocoa solids, can carry the term “chocolate” in their designations in accordance with the provisions or customs applicable in the Country in which the product is sold to the final consumer and this to designate other products which cannot be confused with those defined in this Standard.

**On section 6.2. “Declaration of the minimum cocoa content”**

The European Community can accept that a declaration of the minimum cocoa content must be mentioned on the products referred to in section 2.1.

During the Codex session in Fribourg, the European Community intends to make a text proposal for section 6.2.

In addition, the European Community is of the opinion that it must be provided in the standard that the declaration of the minimum cocoa content is not required for white chocolate (definition 2.1.5), a chocolate or praline (definition 2.4.1) and filled chocolate (definition 2.3).

**SECTION 7. METHODS OF ANALYSIS**

No comments

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**COPAL****CPA 5/9 VOL. 23****SEPTEMBER 19, 2001**

The Secretary  
CODEX ALIMENTARIUS COMMISSION  
Viale delle Terme di Caracalla  
00100  
Rome

**ATTENTION: MRS AWILO**

Dear Sir,

We received notification for comments and indeed the meeting of the Executive Committee scheduled for the 26<sup>th</sup> and 27<sup>th</sup> September only today, regrettably.

Concerning the Draft Standard Chocolate and Chocolate products (Advanced at Step 5 of the procedure) the position of the Cocoa Producers' Alliance remains unchanged.

M. Secretary, the 24<sup>th</sup> Session of the Codex Commission frowned at the proposal of some organizations that Codex has to align itself to norms and standards already in force in other international organizations.

Here too, we feel that a European Directive on Chocolate should not translate into a global standard with the seal of Codex.

We have examined the scientific papers. Kindly provided us by the delegation of the United Kingdom.

Concerning the identification and quantification of other vegetable fats besides cocoa butter in chocolates and the conclusion is the same. One can only reduce the margin of error in the above processes when the vegetable fat in question is given.

How therefore can an Organization like Codex Alimentarius that bases its standards on pure science approve of such a standard we cannot quantify with certainty.

The EU Directive further mentions that the economic impact of the application of this measure will only be studied some time down the road.

Well, we already know the current situation of depressed prices caused by huge stocks of cocoa and any further reduction in cocoa consumption can be predicted without any study.

The EU could very well table this as a regional standard but we do not at this time have all the facts to go along.

Yours faithfully,

**p.p COCOA PRODUCERS' ALLIANCE**

A handwritten signature in black ink, appearing to be 'J. B. Sidi', written over a horizontal line.

Hope SONA EBAI  
SECRETARY GENERAL