

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
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Agenda Item 4 (b)

CX/PFV 02/9-Add.1

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

Twenty-first Session

San Antonio, Texas, U.S.A. , 23-27 September 2002

#### Comments on Proposed Draft Standards at Step 4

#### (1) PROPOSED DRAFT CODEX STANDARD FOR CANNED CITRUS FRUITS

The following comments have been received from Cuba, Egypt, France, the United Kingdom and Uruguay.

##### Cuba

**Title of the Standard:** The title covers all types of citrus fruits. However, this contradicts the standard's scope, which is limited to only grapefruits and mandarin oranges. Other citrus fruits such as sweet and sour oranges are used in the preparation of this type of product. The standard should be drafted as a more general standard to cover other citrus fruits.

1. Scope: **It must not be limited to only grapefruits and mandarin oranges because there are other citrus fruits that are used in the production of this type of canned product such as sweet and sour oranges.**

2. Description: **Cuba proposes to modify the text so that the use of other citrus fruits may be included in the standard. The text could be written as follows:**

##### 2.1.1 Canned citrus fruits is the product:

- (a) prepared from sound and ripe citrus fruits, conforming to the characteristics of the fruit of:
  - *Citrus paradisi* Macfadyen
  - *Citrus reticulata* Blanco (including all the suitable commercial varieties for canning)
  - *Citrus sinensis* (L.), Osbeck (including all the suitable commercial varieties for canning)
  - *Citrus aurantium*, Lin
- (b) packed with water or other suitable liquid packing medium, nutritive sweeteners, and suitable seasoning or flavouring ingredients appropriate to the product, and
- (c) processed by heat, in an appropriate manner, before or after being sealed in a container, so as to prevent spoilage. Before processing, the fruit shall have been properly washed and peeled, and the membrane, seeds and core shall have been substantially removed from the sections.

In paragraph b): Cuba proposes to change the word "seasoning" ("aderezo") to the word "spices" ("especies").

**2.3 Styles:** In the Spanish text the terms “sections, halves, segments” (“secciones, mitades, cascós o segmentos”) must be included. Include paragraphs 2.3.3 and 2.3.4 for sweet and sour oranges as proposed in paragraph 2.1.1 (a), and it could be drafted in a similar fashion as the current text for paragraph 2.3.1 (a) and (b) on grapefruits, taking in consideration the inclusion of the terms “sections, halves, segments” (“secciones, mitades, cascós o segmentos”).

### **3.2.1 Packing Media**

**3.2.1 a)** It must be clarified that the juice may originate from any citrus fruit since paragraph b) refers only to grapefruit juice; it may be understood that any kind of fruit juice, whether citrus or not, is approved. This is clarified in paragraph 3.2.2, subsections b), c), and d).

**3.2.1 b)** In the Spanish text, change the word “syrup” (“jarabe”) to this other synonym for “syrup” (“almíbar”). This regulation must be subjected to the final version of the Guidelines on Packing Media for Canned Fruits approved by the Commission.

**3.2.2.1** This regulation must be subjected to the final version of the Guidelines on Packing Media for Canned Fruits approved by the Commission.

**3.3** If it is intended to approve the use of any fruit juice, whether citrus or not, with the current text from paragraph 3.2.1, then it is not necessary to include lemon juice in the ingredients since it is already included in paragraph 3.2.1.

**8.1.1 and 8.1.2 The Name of the Product:** The final version of the Guidelines on Packing Media for Canned Fruits approved by the Commission must be taken into consideration for the designation of the syrups.

## **Egypt**

Item No. 2.3.1 (b), 2.3.2 (b,c) & 2.3.3

We suggest that these items have to be withdrawn because they would not be accepted by consumers due to the bad appearance of the broken segment pieces.

## **France**

### **1- SCOPE**

The wording in French should be the same as the text already accepted in other Codex standards (e.g. canned pears), that is to say:

" This standard applies to the product as defined in Section 2 below, and offered for direct consumption including for catering purposes or for repacking if required. It does not apply to the product when indicated as being intended for further processing."

### **2 DESCRIPTION**

2.1.1.(a) and 2.1.2 (b): the following should be specified as for other draft standards:

" Packed with water or any other suitable packing medium, sugars as defined in the Codex Alimentarius, other nutritive sweeteners such as honey, and other authorized flavoring ingredients as indicated in section 3.3."

### **2.3. STYLES:**

2.3.1. (a): To be in keeping with the English version, the following should be specified: "sections or segments".

2.3.1. (b): Specify here as well: "broken sections or broken segments";

### **2.4. Size:**

2.4.1. (b): Specify in French: "mixed sizes"

### 3 ESSENTIAL COMPOSITION AND QUALITY FACTORS

#### 3.2. Packing media:

Draft CODEX guidelines for packing media for canned fruit have been drawn up, and can be found in stage 7. It is thus important to refer to this section, with only special exceptions being mentioned in the product-related standards.

The paragraph 3.2.1. should henceforth read as follows:

" 3.2. Packing media:

In compliance with Codex guidelines for packing media for canned fruits (currently under development)".

#### 3.4. Quality criteria:

##### 3.4.1. Color:

The last sentence of (b) should be placed in the text in such a way that it applies to the two products, since citrus fruits and mandarin oranges can be covered with juice.

(a) Add "in compliance with the CODEX standard pertaining to fruit juices".

### **United Kingdom**

#### Section 8 - Labelling

There appears to be a slight error in the paragraph numbering in the labelling section where it lists 8.1.1 for grapefruit and overleaf 7.1.2 for mandarin oranges. The latter should of course be **8.1.2**.

### **Uruguay**

a) 2.1 Product Definition: There is no mention of the orange as a possible canned citrus fruit.

b) In paragraphs 2.1 and 8.1, the name of the product, (in the Spanish version) the use of the term "toronja" (grapefruit) is not appropriate for Uruguay. We propose to add also the term "pomelo" (synonym for grapefruit) as an optional denomination, since this is the term used in South America.

c) When the packing media, discussed in paragraph 3.2 (3.2.1, 3.3.3.1.1 and 3.2.2.1.2), are examined, it is noted that: The liquid media (syrups) are not in agreement with the Guidelines for Packing Media (Alinorm 01/27 Appendix VIII).

In paragraph 7.1.4 c), it is not necessary to have such a diversification in the drain weight requirements (previously it was defined as 54% for fruits packed in syrup).

Uruguay proposes a requirement of 54% for fruits packed in syrup, except for pineapple slices, for which the minimum limit approved should be of 50%, and for strawberries packed in syrup, which minimum limit should be of 35%.

## (2) PROPOSED DRAFT CODEX STANDARD FOR GINSENG

The following comments have been received from the France and the United States.

### France

Just as for the draft standard pertaining to soy sauce, significant problems have been encountered with the translation of the French text. A new revised text for the French language should be sent to the Secretariat between now and the next Committee meeting.

#### 1. SCOPE

It is necessary to specify the botanical names of the different types of ginseng in Latin, because there are at least 20 species.

In France the following species have been authorized: *Panax ginseng*, *Panax quin quefolium*, and *Siberian ginseng* ( or *elentherococcus*: *Elentherococcus senticosus*); daily consumption of ginsenosides is limited.

#### 2 DESCRIPTION

**2.1.2 c) as well as 2.2.2.2.c), 2.2.2.3 c):** the composition should be specified: "*to which swelling agents are incorporated and to which edible plant extracts are added (or not)*".

How is this composition integrated into **3.2**.

Is the list provided in **3.2** a positive list? For example, is it not possible to include minerals ? Laboratories receiving food supplements often come across different compositions.

**2.2.2.2 b):** "*pulverization of white ginseng extract*" should be replaced by "*pulverization of red ginseng extract*"

#### 4 ESSENTIAL COMPOSITION AND QUALITY FACTORS

**3.3.2 e)** 3 ginsenosides (Rg1, Rb1, Rf) have been identified and not quantified. Thus no connection can be made with a dosage of ginsenosides when testing the daily consumption limits often laid down by the health authorities. ( in France a total of 20mg ginsenosides per day).

#### Appendix A:

The translation has not been adapted to technical French terminology:

Example: "*dissolve*" should be replaced by "*stir up*".

Example: "*dry in an oven*" should be replaced by "*dry in an incubator*"

Drying conditions are not specified (temperature, vacuum)

The question mark in the formula should be replaced by "X"

Statistical data (repeatability,.....) should be provided, as well as the number of significant figures in the result given.

#### Appendix B:

In the title "*L-butanol*" should be replaced by "*1-butanol*"

The translation has not been adapted to technical French terminology:

Examples in **2.1, 2.2.1:**

Example: "*refluer (to flow back)*" should be replaced by "*mettre à reflux (to create backflow)*"

Example : "*dissolve the concentrates in 50ml of water*" should be replaced by "*add 50 ml of water to the extracts*".

Example: "*the layer of butanol*" should be replaced by "*the butanolic phase*"

## United States

### General Comments

The standard must clearly identify the plant genus that can be called Ginseng. The Government of the United States recognized the risk that increased fraudulent use of the "ginseng" name /label poses to the public, and passed legislation to tackle this problem. The 2002 Farm Bill section 1086 Pl 107-171, states that Ginseng may only be considered to be a common or usual name for any herb or herbal ingredient that is derived from a plant classified within the genus *Panax*.

#### **1. SCOPE**

The United States is therefore proposing that "*derived from the genus Panax*" be added to end of the SCOPE, which will then reads:

*This Standard applies to dried ginseng and ginseng extract products which have been suitably treated, processed and manufactured from sound, clean and fresh ginseng roots derived from the genus Panax.*

**JUSTIFICATION:** It is imperative that the standard clearly specifies the Genus *Panax*, because of the multitude of products that are marketed as having the desired effects of, and contain ginseng but do not. The specification of the genus *Panax* would separate the real ginseng that produces the desired effect from fraudulent ones. This will yield significant benefits to the international ginseng industry, by ensuring that the authentic product is being traded, and by recognizing the uniqueness of the plant and its products.

### (3) PROPOSED DRAFT CODEX STANDARD FOR JAMS, JELLIES AND MARMALADES

The following comments have been received from Cuba, Egypt, France, Indonesia, United Kingdom, the United States and Uruguay.

#### Cuba

**Title of the Standard:** We propose the following title:

*“Proposed Draft Revised Codex Standard for Jams, Jellies and Marmalades”*

*(“Anteproyecto de Norma Revisada para las Confituras, Jaleas y Mermeladas”)*

We recommend (in the Spanish text) deleting or changing the term “compote” (“compota”, Spanish word originally chosen for the English “jam”) because this term is used to define a specific product regulated by this Committee: “Apple Sauce” (“Compota de Manzana”) which gives rise to confusion. The term “fruit preserves” (“Conservas de Frutas”) should not be used either since this term covers the totality of the fruit preserve products preserved by any method. On the other hand, vegetables such as tomatoes, pumpkins, cucumbers, and carrots have been included.

The lack of any references made to tropical fruits such as mango, guava, pineapple, etc., is somewhat important since these fruits are used in the production of marmalades, jellies and jams, and it is technologically feasible to mix them with other fruits (whether citrus or not) or vegetables in the processing of this type of products.

#### 1. Scope:

**1.2 b)** Cuba does not agree with the fact that this standard does not apply to pastry confectionery purposes. Any marmalade or jam processed under the dispositions of this standard may be used for confectionery purposes.

c) Cuba does not agree with the exclusion of reduced sugar products. There are many countries that traditionally produce marmalades with a soluble solids content of less than 60%, which are not considered to be of “dietetic use”. These are simply products traditionally used as desserts, even without a gelled consistency and with or without thickening agents. Even when current requirements demand work concerning the reduction of the content of sugars, these products may very well be covered by this standard, which would then be of a more general character and of greater usefulness in trade.

#### 2.1 Product Definitions

Cuba proposes the following definitions:

- **Jam (“Confitura”)**: Is the product made by cooking one or more kinds of fruit, whole or in pieces, mixed with sugars or other carbohydrate sweeteners such as honey, with or without the addition of water, brought to a solid gelled or semi solid gelled consistency, in which the starting fruit material or pieces can be visibly recognized.
- **Extra Jam**: Is the product made by cooking a content of at least 45% by weight of one or more kinds of fruit, whole or in pieces, mixed with sugars or other carbohydrate sweeteners such as honey, with or without the addition of water, brought to a solid gelled or semi solid gelled consistency, in which the starting fruit material or pieces can be visibly recognized.
- **Jelly**: Is the product made by cooking fruit juices, peel and/or aqueous extracts mixed with sugars and/or carbohydrate sweeteners such as honey, brought to a solid gelled consistency. During processing, pieces of fruit, or in the case of citrus fruits, peel strips or finely cut peel may be included in the product.

- **Extra Jelly** : Is the product made by cooking a content of at least 45% by weight of fruit juices, peel and/or aqueous extracts mixed with sugars and/or carbohydrate sweeteners such as honey, brought to a solid gelled consistency. During processing, pieces of fruit, or in the case of citrus fruits, peel strips or finely cut peel may be included in the product.
- **Marmalade**: Is the product made by cooking fruits and/or vegetables, whole and/or in pieces, or fruit pulp, fruit puree, fruit juice (natural or concentrate), mixed with sugars and/or carbohydrate sweeteners such as honey, with or without the addition of water, brought to a semi liquid or thick or solid gelled or semi solid gelled consistency.
- **Extra Marmalade**: Is the product made by cooking a content of at least 50% by weight of fruits and/or vegetables, whole and/or in pieces, or fruit pulp, fruit puree, fruit juice (natural or concentrate), mixed with sugars and/or carbohydrate sweeteners such as honey, with or without the addition of water, brought to a semi liquid or thick or solid gelled or semi solid gelled consistency.

## 2.2 Other definitions

Subsection (b) covers fruit and subsection (c) covers vegetables. They cannot be considered as vegetables. Cuba proposes to clarify here the fruit types (whether citrus fruits or not). Vegetables should also be included, i.e., the text must read: **Fruits and Vegetables**.

Vegetables should also be included in the definitions of Fruit Pulp and Fruit Puree, therefore, Cuba proposes the following text:

**Fruit or Vegetable Pulp**: The edible part of the whole fruit or vegetable, if appropriate, less the peel, skin, seeds, pips and similar which may have been sliced or crushed but which has not been reduced to a puree.

**Fruit or Vegetable Pulp Puree**: The edible part of the whole fruit or vegetable, if appropriate, less the peel, skin, seeds, pips and similar which has been reduced to a puree by sieving or a similar process.

Cuba also proposes the inclusion of the following definitions:

**Solid gelled consistency product**: The product that, upon being taken out of its container, maintains the shape of the interior of the container and shakes in response to movement, without losing its integrity or shape. It can be easily cut; it has a shiny appearance with a firm and soft texture.

**Semi-solid gelled consistency product**: The product that, upon being taken out of its container, tends to lose the shape that it had acquired analogous to the interior of the container and presents some separation from its liquid component; it shakes in response to movement and loses its integrity and shape with a certain ease. It cannot be as easily cut; its texture is less firm but is softer than the products of solid gelled consistency.

**Semi-liquid or thick product**: Is the product that lacks the rigidity characteristic of a gel but which maintains cohesion; it is not light enough to be poured as easily as a liquid. This consistency can be achieved with the addition of one or more thickening or gelling agents or with a high content of fruits and the use of thickening or gelling agents.

## 2.3 Cuba proposes to delete this paragraph.

### 3.1.1 Basic Ingredients: Cuba proposes the inclusion of the (4) vegetables defined in paragraph 2.2

### 3.1.2 Fruit Content: The following percentages are proposed:

- **Jam (“Confitura”)**: 35% in general
- **Extra Jam**: 45% in general
- **Jelly**: 35% in general
- **Extra Jelly**: 45% in general
- **Marmalade**: 40% in general. In the case of mixed fruits and vegetables, the fruit or vegetable stated in first place shall constitute 50% to 60% of the total fruit content.

- **Extra Marmalade:** 50% in general. In the case of mixed fruits and vegetables, the fruit or vegetable stated in first place shall constitute 50% to 65% of the total fruit content.

**3.1.3 Optional Ingredients:** The following ingredients are proposed without limits:

- Essential oils
- Aromatic herbs
- Spices
- Vanilla, vanilla extracts and vanillin
- Native starches

**3.2 Soluble Solids:** Cuba proposes the following limits:

- **Jams (“Confituras”):** a minimum of 60%
- **Jellies:** a minimum of 60%
- **Marmalades:**
  - a) **Without thickening and/or gelling agents:** a minimum of 30%
  - b) **With thickening and/or gelling agents:** a minimum of 60%

**3.3.1** Include the following text in the 1<sup>st</sup> paragraph: Fruits and vegetables may be.....

2nd paragraph: Delete the word “gelled” (“gelatinosa”).

**3.3.2** Change (in the Spanish version) the word “compote” (“compota”) to the word “jam” (“confitura”) as mentioned in paragraph 2.1.

**4. Food Additives**

Cuba proposes to include the Modified Starches in the list of thickening agents:

1400, 1401, 1402, 1403, 1404, 1405, 1410, 1412, 1413, 1414, 1420, 1421, 1422, 1440, 1442 and 1450.  
50g/kg

Cuba proposes to include the following item in the list of preservatives for hotter climate countries:

202 Potassium Sorbate      1 g/kg

**8.2** The Name of the Product: Must be modified according to the definitions given in paragraph 2.1.

**8.4** The declaration of sugar content must be done according to the percentage of soluble solids.

**Egypt**

Item No. 404 Colours

We suggest addition of the Brilliant blue (INS 133) and Allura Red (INS 129) to the listed colours.

**France**

**1- SCOPE**

1.1. The text should be the same as the text already adopted in other French CODEX standards (e.g. canned pears):

"This standard applies to the product as defined in Section 2 below intended for direct human consumption including for catering purposes or for repacking if required.

1.2. The points (a) and (b) could be merged so that the wording resembles the text adopted in other Codex standards:

" This standard does not apply to:



- (a) products indicated as being intended for further processing, particularly when these are to be used for the manufacture of fine bakery wares, pastries or biscuits."

It is not a good idea to retain the phrase "bakery jam".

## **2 DESCRIPTION**

2.1. For the products "jam", "extra jam", "jelly" and "extra jelly", "marmalade", the terms "carbohydrate sweeteners such as honey" should be replaced in the French version by "sugars and/or other nutritive sweeteners such as honey".

2.2 Aqueous extracts: the proposed definition does not correspond to what is usually understood by the term aqueous extract of fruits; these extracts, which are used for manufacturing jellies, are obtained in industry by using water to extract water soluble constituents from certain fruits which contain only little juice.

The proposed definition is as follows:

"Aqueous extract of fruits: aqueous extract of fruits is obtained by using water to extract all the water soluble constituents from the fruits in question".

In the French version, "citrus fruit sugars " should be replaced by "sugars" and it would be a good idea to add "and other nutritive sweeteners", since sugars extracted from fruit and honey are not sugars.

(b) Reference is made to a standard, whereas this does not exist for sugar extracted from fruits; however, it would appear necessary to introduce a definition of fruit sugars.

(c) The proposed definition would be as follows:

"fruit sugars: product obtained from fruit juice using mechanical means and resulting in a sugar concentrate which has undergone the authorized de-acidification processes, and from which any constituents other than sugar have been eliminated".

## **3 ESSENTIAL COMPOSITION AND QUALITY FACTORS**

### **3.1.2.Fruit content**

In the French version the term "corm" should be replaced by "sorb".

3.1.3. Fruit juice concentrate should not be authorized in the manufacture of jam, since this would be considered cheating on the ingredients of the product; section 2.1. allows for the addition of pulp and puree exclusively.

It should not be possible to add butter and margarine; the product obtained would be different from the defined product (in such a case this would be a preparation for pastries).

The translation of the last paragraph is wrong; in French the text should read:

" liquid pectin, edible oils and fats as antifoaming agents, spirits, wine and wine liqueur, stone fruits, aromatic herbs, spices, vanilla and vanilla extract, vanillin".

Water should not be included here, being already mentioned in 2.1.

### **3.3 Quality criteria:**

The French translation should be revised. In particular the term "fruit ingredient" should be replaced by "basic ingredient".

3.3.2 Allowances for defects: the preceding standard laid down limits; it would be a good idea to lay down limits for stones and pieces of stone, which are an extremely serious defect.

## 4 ADDITIVES

### 4.4. Coloring agents

It should be noted in section 4.4 that these coloring agents are only authorized in jams, fruit jellies and marmalade.

### 4.5 Firming agents

When these additives are used, justification must be provided.

### 4.6 Flavors

Flavors and natural flavors should not be authorized, in compliance with community regulations; the quantities of fruit used should suffice to give the product its taste.

### 4.7 In the French version the term "additives" should be replaced by "preservatives".

The residual limit in the finished product when using sulphited fruit pulp should be 50 mg/kg and not 100 mg/kg.

Sulphur dioxide should not be added to the finished product; technologically speaking there is no need for it. The proposed use of preservatives for "hot countries" is not justified; jam is a product which keeps due to its sugar content, and it is not necessary to keep it in a refrigerator when the soluble dry matter content is equal to or higher than 60%.

### 4.8. In the French version the term "firming agents and gelling agents" should be replaced by "gelling agents".

## 8. LABELLING

8.2. In French the only names possible are "jam" and "extra jam" for the first two categories (delete the word "preserve").

8.4. Specify: "total sugar content Xg per 100g" (instead of "sugar").

### Indonesia

1. Proposed the Codex Standard may be applied for pineapples, mangoes and other tropical fruits where necessary.

### 2. FOOD ADDITIVES

Taking account the work of CCFAC, Indonesia propose to refer the GSFA and delete the current list written in the draft.

The proposed sentence: The use of food additive(s) as well as food additive(s) carryover shall comply with the maximum level permitted by the Codex Committee on Food Additives and Contaminants. Other additional additives currently used may be incorporated in this standard and it shall be kept at the level as minimum as possible.

### 3. SULPHUR DIOXIDE DECLARATION

Taking account the ADI justified by JECFA, therefore Indonesia propose the sentence:

**The products covered by this standard shall indicate in the ingredients list the presence of any residual Sulphur Dioxide if contained in the product at the level greater than 50 mg/kg.**

### United Kingdom

The UK as drafting country for this standard has noticed some slight typographical and paragraph numbering errors as a result of transposition. These are indicated below as follows:

-

**2.1 Extra jam** - should read (i) not (ii) rosehip jam

### 2.2 OTHER DEFINITIONS

Delete **citrus fruit** as a definition has been omitted and is probably in any case superficial to requirements.

**Sugars** should read (a) Sugars as defined in the Codex Alimentarius Standard  
on Sugars  
(b) Sugars extracted from fruit

2.2 Paragraph numbering of **Presentation** should read **2.3**

3.1.1 should read :-

(1) Fruit ingredient as defined in section 2.2 in quantities laid down in Sections **3.2 (a) - (c)** below.

*(Delete para no.) These are exclusive of any added sugar or optional ingredients. In the cases of jelly and extra jelly the quantities where appropriate shall be calculated after deduction of the weight of water used in preparing the aqueous extracts.*

(2) Sugar as defined in Section 2.2 and /or sweetening agent

3.1.3 Delete word **as** in this sentence

3.2 Amend first sentence to **Sections 3.2 (a)- (c)**

3.3.1 3<sup>rd</sup> paragraph, last line should read **Section 4.7** rather than 4.4

8.2.4 3<sup>rd</sup> word “form” should read **from**

## United States

### General Comments:

The United States has a long history of producing a wide variety of jams, jellies, and marmalades. Hence, United States standards of identity for these products have developed with production practices. Therefore, it is helpful to the producer if the Codex draft standard reflects established trade practices. These commodities represent a large component of the United States food industry, and the production is regulated through the United States Compliance Policy Guidelines (CPG) from the Food and Drug Administration (FDA). These guidelines clearly indicate the definition of the commodities and the minimum of major ingredients used to make jams, jellies and marmalades. For years the United States industry has adopted the guidelines for these commodities.

### Section 2.1. Product Definition.

#### Marmalade:

The proposed Codex definition is:

*Marmalade is the product brought to a suitable gelled consistency made from the whole fruit, fruit pulp, puree, juice, aqueous extract or peel of citrus fruits mixed with sugars and/or carbohydrate sweeteners such as honey, with or without the addition of water.*

This definition leaves out citrus fruit Peel which is an integral ingredient, therefore the United States is proposing the definition:

*The jelly like product made from **the properly prepared peel and juice** with or without the pulp, **of citrus** fruit with sugar and dextrose, by cooking with water. It contains, **pieces of the fruit peel embedded in the mass.***

### Section 3.1.2 Fruit Content

#### 3.1.2. (a) Jams and Jellies

The United States Standard of identity for jam requires a minimum of 45 – 47 percent by weight (depending on the fruit used), of the finished product be fruit. The proposed standard requires a minimum quantity of fruit ingredient (35% (in general) which is lower than the United States industry standard. Therefore, the United States proposes to amend the limit of fruit ingredient to be not less than 45% (in general).

### 3.1.2. (c) Marmalade

The CPG for marmalade recommends that, depending on the citrus variety used, a minimum of 25 – 35 percent by weight, of the finished product be peel and juice. The CPG limit is higher than that of the proposed draft standard limit for citrus fruit ingredient (i.e. minimum *20 percent of the finished product with no less than 7.5 percent from the endocarp*). Therefore, the United States proposes to amend the limit of citrus fruit ingredient to be not less than 25%.

### 4.6 Flavoring

The United States is requesting that the *Natural Mint* and *Natural Cinnamon* flavors be added back to the Draft Standard. These flavors were previously part of the Proposed Revised Codex Standard for Jam, (Fruit Preserves), and Jellies, Section 4.6.2 and 4.6.3 .CL 1997/1-PFV

### 8.0 Labeling

The required labeling of fruit content per 100 grams seems similar to the Quantitative Ingredient Declaration (QUID). The United States believes that, in its current format the labeling requirement is similar the disclosure of proprietary information and hence unnecessary. The declaration of ingredients in descending order of predominance by weight as outlined in the “Codex General Standard for the Labeling of Prepackaged Foods” [CODEX STAN 1-1985 9 rev 1-1991)] is sufficient to provide consumers with they need regarding ingredient labeling.

## **Uruguay**

a) Regarding this proposed draft, we find ourselves (as we previously did) in a position where the concept of the product of interest is different than the one that we consume in our diet. The consistency of the product is described as “gelled”, it should be semi-solid or pasty.

In Uruguay, marmalades are not made exclusively of citrus fruits. A definition is not given for fruit paste (“dulce de corte”). Uruguay proposes the following definition: it is the sweet made with a firm consistency for ease of cutting, made by cooking and concentrating sieved fruit or vegetable pulp, and mixed with sugars.

The term “jelly marmalade” is confusing.

b) In paragraph 2.1, we do not understand how aqueous extracts can be used to make marmalades.

c) In paragraph 2.2, more clarity is needed in the text corresponding to the ingredients. For example, in a) Sugars: the reference standard should be stated; b) What does it refer to? and c) is already included in a).

d) In paragraph 8.3, Fruit Quantity Declaration: the quantity of fruit used in the processing, is a novel requirement in this type of regulations. It is not clear why quince is found among the products that require less fruit content. In Uruguay, this is not the case.

e) In terms of the approved food additives, there is certainly no agreement with our criteria and traditional technology (for instance SO<sub>2</sub>, for which only 100 mg/kg is permitted in the finished product) nor our use of containers (such as plastic containers that do not isolate from contamination and that justify the use of preservatives, which are not authorized).

Uruguay proposes a maximum of 200 mg/kg of SO<sub>2</sub> in the finished product (sweets, marmalades).

f) The use of preservatives (benzoic and sorbic acid) is not only for hot climate countries. They are also for products that do not require refrigeration before being opened.

h) Paragraph 3.2, soluble solids, was changed from a minimum of 65% to a minimum of 60%. It is not clear why this modification took place.

#### (4) PROPOSED DRAFT CODEX STANDARD FOR SOY SAUCE

The following comments have been received from Brazil, France, Indonesia, Japan, the Netherlands, United Kingdom, the United States and IAFCO.

##### Brazil

**In order to simplify the items in Product Description (2), we suggest the following for Product Definition:**

##### 2.1 Product Definition

**Soy sauce** is a liquid seasoning obtained by fermentation of soybeans and/or by hydrolysis of vegetable proteins.

Individual definitions of each type of soy sauce are described under Section 2.1.1 through 2.1.3.

**2.1.1 Brewed soy sauce** is the product obtained by:

- a) *Aspergillus oryzae* and /or *Aspergillus sojae* as a starter are cultured in either soy beans or soybeans and cereal grains; or bacteria and/or moulds and/or yeasts are cultured in either soybeans or soybeans and cereal grains; or food grade enzymes are mixed with either soybeans or soybeans and cereal grains.
- b) The mixture of the product obtained by (a) and water is fermented and aged.

**2.1.2 Non-brewed soy sauce** is the product obtained by

- a) Vegetable protein materials, including soy beans and/or defatted soy, are hydrolysed by using acids,
- b) Other ingredients are added to (a) as specified in 3.1.2.

**2.1.3 Mixed soy sauce** is the product obtained by mixing the types of soy sauce described in 2.1.1 and 2.1.2.

**In order to be consistent with the item Description we suggest the following changes in the text for item 3.1.1.:**

##### 3.1.1 Basic Ingredients

###### 3.1.1.1 Brewed soy sauce

- (a) Soybeans (including defatted soybeans),
- (b) Salt,
- (c) Potable water.

###### 3.1.1.2 Non brewed soy sauce

- (a) Vegetable proteins
- (b) Sugars (as defined in the Codex Standard for Sugars CX-STAN 212-1999)
- (c) Potable water
- (d) Salt (to be used only in the case of process using enzymes)

##### 3.1.2 Other Permitted Ingredients

For Brewed soy soy sauce (a) to (g) may be used, and for Non brewed soy sauce (a) and (d) to (g) may be used.

- (a) Cereal grains
- (b) Vegetable proteins
- (c) Sugars

- (d) Vinegar
- (e) Sweet rice wines
- (f) Distilled alcohol of agricultural origin
- (g) Salt
- (h) Hydrolyzed Vegetable Protein

**In order to follow recommendations for CCFAC the item 4. On Food Additives should be simplified and only quote the Tables of Additives as follows:**

#### **4. FOOD ADDITIVES**

**Acidity Regulators / Antifoaming Agents / Colours / Flavour Enhancers / Preservatives / Sweeteners / Thickening and Stabilizing Agents** – Any of these additives listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (clear sauces – eg....soy sauce) in Tables 1 and 2 of the Codex General Standard for Food Additives.

**In order to be consistent with item Description the item 6.1 Name of the Products should read as follows:**

##### **6.1 THE NAME OF THE PRODUCTS**

6.1.1 The name of the products shall be labelled as follows.

Brewed soy sauce

Non brewed soy sauce

Mixed soy sauce

According to the descriptions in subsection 2.1.1 through 2.1.3

6.1.2 The name of Mixed soy sauce shall be accompanied by the type of soy sauce mixed or Hydrolyzed

##### **France**

Significant problems have been encountered with the translation of the French text. This text will probably be revised by France and sent back to the Secretariat for the next FLT (*Fruits et Légumes Traités* – Processed Fruit and Vegetables) Committee meeting.

#### **5 DESCRIPTION**

5.1 Product definition:

The text should detail the type of packing, and specify whether the product is heat treated or not.

##### **Indonesia**

#### **ISSUES**

Considering more than 80 % soy sauce market in Indonesia, Malaysia and Brunei Darussalam occupied by sweet soy sauce, therefore consumer needs should be taken into account. Therefore Indonesia would like to propose flexibility of the standard in which consist of the sweet soy sauce within:

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

This standard applies to the products both salty soy sauce and sweet soy sauce provided by process as defined in section 2.

## 2. DESCRIPTION

### 2.1 Product Definition

Soy Sauce is a liquid seasoning obtained by fermentation of soybeans and/or by hydrolysis of vegetable proteins.

Individual definitions of each type of soy sauce are described under section. 2.1.1. through 2.1.3.

2.1.1 Natural Fermented Soy Sauce is the product obtained by :

- (a) *Aspergillus oryzae* and/or *Aspergillus sojae* as a starter are cultured in either soybeans or soybeans and cereal grains; or bacteria and/or molds and/or yeasts are cultured in either soybeans or soybeans and cereal grains.
- (b) The mixture of the product obtained by (a) and salt water is fermented and aged for not less than 90 days below its temperature of 40<sup>0</sup> C.

Instead of salt water in the process described above, **natural fermented soy sauce brine**, or a mixture of **natural fermented soy sauce brine** and salt water may be used .

2.1.2 Hydrolysis Fermented Soy Sauce is the product obtained by :

- (a) Vegetable protein materials, such as defatted soybeans, are hydrolyzed by using acids or enzymes (the product obtained by this process is hereinafter referred to as "hydrolyzed Vegetable Protein")
- (b) Soy sauce(s) and Hydrolyzed Vegetable Protein are mixed.

2.1.3 Mixed Soy Sauce is the product obtained by :

- (a) The different types of the soy sauces defined in subsections 2.1.1, through 2.1.3 are mixed; or
- (b) Soy sauce(s) and Hydrolyzed Vegetable Protein are mixed.

In accordance with description, the corresponded Essential Composition and Quality Factors will be :

### 3.1. Composition

#### 3.1.1. Basic Ingredients

- (a) Soybeans (including defatted soybean)
- (b) Salt
- (c) Water

#### 3.1.2. Other Ingredients

- (a) Other legumes and/or vegetable proteins
- (b) Cereal grains
- (c) Sugar and/or Brown sugars
- (d) Spices and/or Herbs
- (e) Other permitted ingredients

### 3.2. Quality Factors

- (a) Total nitrogen not less than: 0.4% in salty soy sauce 0.2% in sweet soy sauce
- (b) Soluble solids contents, exclusive of added salt not less than 6% (w/v)

#### 4. FOOD ADDITIVES

Taking account the work of CCFAC, Indonesia proposes to refer the GSFA and deletes the current list written in the draft.

**The proposed sentence:**

**The use of food additive(s) as well as food additive(s) carry-over shall comply with the maximum level permitted by the Codex Committee on Food Additives and Contaminants. Other additional additives currently used may be incorporated in this standard and it shall be kept at the level as minimum as possible.**

#### 5. LABELLING

Prepackaged product covered by this Standard shall be labeled in accordance with the Codex General Standard for the Labeling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991).

5.1.1. The name of the Products

The name of the products may be labeled in accordance with the nature form of processes and to the national legislation.

5.1.2. Labeling for “Halal”

Claim on “Halal” Soy Sauce shall follow the appropriate section of the Codex General Guideline for Use the Term “Halal” (CAC/GL 24-1997)

#### Japan

Japanese Government would like to submit comment regarding the methods of analysis in this draft as follows:

First of all, we believe that after endorsement by Codex Alimentarius Commission, the provision of methods of analysis should be “See Codex Alimentarius volume 13.” However, it needs to good understanding of the progression with respect to methods of analysis for our discussion because CCPFV should consider this draft including the section of methods of analysis. Therefore this section should be “[Under Consideration]”.

We are now developing the methods of analysis for the analyst, Total Nitrogen and Soluble Solid Content exclusive of Added Salt, which are prescribed in Quality Factors and will provide the information with respect to validation data on criteria of “Principle for the Establishment of Codex Methods of Analysis” described in the Codex Procedure manual in accordance with Recommendations for a Checklist of Information Required to Evaluate Methods of Analysis Submitted to the Codex Committee on Methods of Analysis and Sampling”.

After validation, these methods would be consider at the agenda of Methods of Analysis for Processed Fruits and Vegetables in the next Session.

#### The Netherlands

1.Merge the proposed definitions, "naturally brewed soy sauce" and "short-terms brewed soy sauce" into a single category for "brewed soy sauce". The use of the term "natural", as in "naturally brewed soy sauce" cannot be justified under existing Codex Standards and Guidelines.

\* Codex General Standard for the Labelling of Prepackaged Foods, section 3.1: "Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect." (emphasis added)

\* Codex General Guidelines on Claims:

\* section 3.5: Prohibited claims: "Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer".

\* section 5.1(iii), "Terms such as "natural"...when they are used, should be in accordance with the national practices in the country where the food is sold. The use of these terms should be consistent with the prohibitions set out in section 3".



"Natural" is subject to national practice and will, therefore, have multiple interpretations and/or regulatory definitions, making it difficult to adopt the proposed soy sauce designation. Furthermore, there is no coherence between the names "naturally brewed soy sauce" and "short-term brewed soy sauce." A consumer could easily be misled, concluding "short-term brewed soy sauce" is somehow not "natural" or is not as safe as the "naturally brewed" variety.

2. Provide for the use of food-grade enzymes within the category for "brewed soy sauce".

There is no justification for classifying soy sauce types that utilise enzymes as "non-brewed soy sauce".

\* In traditional methods of soy sauce production, micro-organisms are added for the sole purpose of producing enzymes. The enzymes hydrolyse the proteins, an action that is essential for developing the taste attributes of soy sauce. Newer production methods have been developed whereby the enzymes are added directly. They act in exactly the same manner as enzymes produced by the addition of micro-organisms.

Use of enzymes in soy sauce production is fully in line with biological production methods and reflects continuing innovation in soy sauce technology.

3. Eliminate criteria for time, temperature and the addition of salt from the definition for "brewed soy sauce".

There is no justification for use of time, temperature or time of salt addition to distinguish between "naturally brewed soy sauce" and "short-term" brewed soy sauce. These factors should be left to the manufacturer based on optimal conditions to achieve the expected product.

\* Brewing time for soy sauce production has, over its 2000-year history, been reduced from several years to a matter of months and the resulting product is still called soy sauce. Setting an arbitrary time factor of 90 days does not allow for continued innovation.

\* Brewing temperature also reflects technological advances and manufacturing conditions. Temperature should not be used as a marker when distinguishing between different types of soy sauce.

Salt acts to inhibit enzyme activity during soy sauce production. Decisions about when to add salt should be left to the manufacturer and should not serve as a marker to distinguish between types of soy sauce.

4. Reserve the category "non-brewed soy sauce" for those products produced by acid hydrolysis.

5. Incorporate a reference into each part of the Additives section stating that any additive used in Table III of the GSFA can be used in soy sauce.

The Additives Section of the Draft Standard should reflect work that has already been agreed to as part of the Codex General Standard on Food Additives.

\* Until such time that the GSFA is fully in place, reference to the use of GMP additives (Table III of the GSFA) should be included in the Draft Standard.

\* The Draft Standard should list only those additives needed for soy sauce production that have ADIs and that are accounted for in Table I of the GSFA.

### **United Kingdom**

We notice the omission of a section relating to contaminants (normally Section 5) in this draft standard. We suggest that the standard sub sections relating to heavy metals and pesticide residues are included. In addition the Committee may also consider making reference to the fact that CCFAC are currently discussing setting maximum levels for choropropanols, in particular the contaminant 3MCPD, in soya sauce made from acid-HVP acid.

It may therefore be prudent for the Committee to include some appropriate wording in this standard such as:-

The Codex Committee on Food Additives and Contaminants is currently discussing maximum levels for the contaminant 3-MCPD in soya sauce made from acid HVP. When this is agreed soya sauce products covered in sections 2.1.3 and 2.1.4 must comply with the maximum levels established by the Codex Alimentarius Commission for these products.

In addition we note the absence of a section (8) on weights and measures including crucially any minimum fill level, and also the classification of defectives or lot acceptance sections.

## United States

### General Comment

The United States recognizes the historical and cultural significance of Soy Sauce in certain cultures. However, soy sauce has moved from a product manufactured in traditional methods and consumed by certain ethnic groups to a major international product, manufactured using new and traditional methods. The United States prefers that the proposed draft standard reflect this new product, encompassing all methods of manufacturing without the appearance discrimination based on method of manufacture.

### 2.1 Product Definition

The proposed draft standard defines “**Soy Sauce**” as a liquid seasoning obtained by fermentation of soybeans and/or by hydrolysis of vegetable proteins. In addition to this all purpose definition, definitions of four types of soy sauce are proposed. The proposed draft standard should require that these names be used for labeling purposes only on a voluntary basis.

The term “**Soy Sauce**” is customarily and appropriately used by industry and understood by customers to describe all types of soy sauce, regardless of the specific method of manufacture. Therefore, a mandatory requirement to identify how a soy sauce is produced- namely as brewed or non-brewed, or variations thereof- is inconsistent with this established usage of the” **Soy Sauce**.”

#### 3.1.1.2. Basic Ingredients.

The proposed draft standard appears to preclude the addition of salt to soy sauce produced using acid-hydrolyzed proteins. The addition of salt may not always be necessary. The draft standard should allow flexibility in the use of salt by the manufacturer of acid -hydrolyzed proteins. Therefore, the United States proposes to delete the parenthetical term in 3.1.1.2 (d ): (to be used only in the case of processes using enzymes).”

### 4. Food Additives

The United States believes that the Standard should allow for the use of any safe and suitable food additives appropriate for use in soy sauce processing or production. Therefore, the United States proposes the deletion of the current list of food additives provided in the draft standard and replace it with a reference to the General Standard for Food Additives and Contaminants (GSFA) that is being developed by the Codex Committee on Food Additives and Contaminants (CCFAC). Because of this, the United States proposes the following wording for the food additive section of the draft standard:

#### 4.1. Acidity Regulators

Any acidity regulators listed in Table 3 of the Codex General Standard for Food Additives, or listed in the food category 12.6.4. (Clear sauces (e.g. soy sauce, fish sauce)) in Table1 and 2 of the Codex general Standard for Food Additives.

#### 4.2 Antifoaming Agents

Any antifoaming agents listed in Table 3 of the Codex

General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

#### 4.3 Colours

Any colour listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

#### 4.4 Flavour Enhancers

Any flavour enhancers listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

#### 4.5 Preservatives

Any preservatives listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

#### 4.6 Sweeteners

Any sweeteners listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

#### 4.7 Stabilizers and Thickeners

Any stabilizers and thickeners listed in Table 3 of the Codex General Standard for Food Additives or listed in food category 12.6.4 (Clear sauces (e.g., soy sauce, fish sauce)) in Tables 1 and 2 of the Codex General Standard for Food Additives.

### IAFCO

IAFCO supports the proposed draft standard for soy sauce prepared by the government of Japan. The draft standard recognizes the difference between traditional soy sauce and other varieties of the product.

Traditional soy sauce is made from soy beans. The key feature of this product is fermenting or brewing, which can take three months or more, depending on the flavor and consistency that the manufacturer wants to achieve. By contrast, so-called “soy sauce” products made by some American companies are produced through a quicker process using inferior ingredients – hydrolyzed vegetable protein (HVP), caramel coloring, corn syrup, and various additives. HVP consists of vegetable protein that has been chemically degraded to the amino acids of which it is composed.

The proposed Codex standard accurately reflects this distinction by requiring the use of descriptive terms such as “naturally brewed,” “short-term brewed,” “non brewed,” or “mixed,” in conjunction with the term “soy sauce.” It should be the responsibility of manufacturers of non-traditional products to inform consumers through labeling that the item that they may be purchasing is made in a non-traditional manner. Hence, the term “nonbrewed” should appear on the labels of “soy sauce” products that are not fermented.

We oppose the position of the International Hydrolyzed Protein Council (IHPC) that all products be designated “soy sauce,” with traditional manufacturers being allowed the option of calling their products “brewed soy sauce.” This approach is not consistent with Codex’s mission, which is to ensure fair practices within the food trade. It is unfair to place the burden on manufacturers of traditional soy sauce to inform consumers that their product is authentic while permitting other manufacturers to imply through labeling that non-traditional products are genuine. We believe that if a product purporting to be soy sauce is not produced using the traditional method, then it should not be allowed to be labeled simply as “soy sauce.” Doing so would mislead consumers.

We are concerned about recent public statements by officials from the delegation of the United States indicating that they will challenge the soy sauce standard proposed by Japan. In the United States, where the labeling approach advocated by IHPC is allowed, there is evidence of significant consumer confusion. This problem should not be expanded worldwide.

While IAFCO generally supports the proposed soy sauce standard, we believe that it should be made consistent with other Codex standards for processed fruits and vegetables by including a section addressing “contaminants.” Therefore, the following language should be added:

## 5. Contaminants

### 5.1 Heavy Metals

The products covered by the provisions of this standard shall comply with those maximum levels for heavy metals established by the Codex Alimentarius Commission for these products.

### 5.2 Pesticide Residues

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

Additionally, the Codex Committee on Food Additives and Contaminants is currently considering adopting maximum levels for chloropropanols, potential carcinogens that are produced when certain HVPs are added to foods to accelerate production. IAFCO urges the Committee to incorporate any maximum levels for chloropropanols that Codex may establish in the future.

## (5) PROPOSED DRAFT CODEX STANDARD FOR CANNED TOMATOES

The following comments have been received from Egypt, France, United Kingdom and Uruguay.

### Egypt

Item No. 3.2.4.1 Mould Count

There is no need for this item according to the European specifications.

Item No. 5.1.1 Heavy Metals

We suggest that the maximum levels of heavy metals established by the Codex Alimentarius Commission for these products shall comply with the total solid content in the final product and the established level shall be expressed as follows:

(X1) heavy metals concentration (P.P.M) in Tomato product

= 
$$\frac{\text{The total solid content in tomato product} \times (\text{X 1}) \text{ in tomato pulp}}{\text{total solid in tomato pulp}}$$

### France

#### 2- SCOPE

The text in French should be the same as the text already accepted in other Codex standards (e.g. canned pears), that is to say:

"This standard applies to the product as defined in Section 2 below intended for direct human consumption including catering purposes, or for repacking if required. It does not apply to the product when indicated as being intended for further processing".

#### 6 DESCRIPTION

##### 6.1 Product definition:

*Addition of hybrid varieties?*

*Other than extra added water ?*

(a) The description of the trimming mentioned in (c) should be mentioned in (a).

##### 6.2 Varietal types:

It would be better to say: "elongated: ovoid or oblong".

2.5 In French "Type of packing" and not packaging.

##### 2.5.2 Solid pack

#### 7 ESSENTIAL COMPOSITION AND QUALITY FACTORS

##### 3.1.2

(a) Add "in compliance with the Codex standard pertaining to fruit juice"

(b) *Residual matter*

(c) The characteristics of puree and pulp should be deleted, and the following added "in compliance with the CODEX standard pertaining to tomato concentrate".

(d) The characteristics of tomato paste should be deleted, and the following added "in compliance with the CODEX standard pertaining to tomato concentrate".

### 3.2.3 Other authorized ingredients:

- (a) The wording should be as follows " spices, dried aromatic plants, (such as basil leaves), and natural extracts of these, flavoring agents.
  - (b) Is not justified here; corresponds to the product described in 2.5.3.; this section is a list of the substances that can be incorporated in all preparations, whatever be the type of packing used.
  - (d) There is a mistake in the French version; in addition to added nutritive sweeteners, the text already used for other Codex standards should be used.
- " When acidifying agents are used, sugars as defined in the Codex standard may be added".

## 3.3 QUALITY CRITERIA

3.3.1.2. The French translation should be revised: "Abnormal (or unacceptable) presence of core material: tough or fibrous matter, or tomato tissue representing the tomato core that is objectionable as to appearance and edibility".

3.3.1.5 Should be specified in French: " The presence of skin is considered a defect, except in "unpeeled" styles; it is that which adheres to the tomato flesh or is found loose in the container".

### 3.3.5 Allowances for defects :

The French translation should be revised:

" The finished product shall be prepared from such materials and under such practices that it shall be substantially free from objectionable core material and extraneous plant material, and shall not contain excessive defects whether specifically mentioned in this standard or not. Certain common defects shall not be present in amounts greater than the following limitations".

### 3.3.5.3.Mould count

## 8 FOOD ADDITIVES

This paragraph as it stands is unacceptable.

During the 34<sup>th</sup> session of the Codex Committee on Food Additives and Contaminants (CCFAC), the Committee asked that thought be given to the subject of coherence between the product standards and the General Standard for Food Additives (GSFA). A workshop supervised by France and the United States has been set up to discuss and propose modifications to be made to the introduction to the GSFA.

The position held by France was made clear during these workshops, being based on the principles specified in the Procedures Manual, in the chapters "Guidelines pertaining to procedure for acceptance of standards ", and "inter-committee relations", main principles governing the use of food additives adopted by the Codex Alimentarius Committee during the 9<sup>th</sup> Session, and the introduction to the Codex General Standard for Food Additives (Codex Stan 192-1995 Rev 2 -1999). This viewpoint can be summarized as follows:

- the Codex Committee on Processed Fruits and Vegetables is responsible for evaluating the technological necessity and the safety in usage of food additives as proposed in the draft standard,
- the Committee shall examine each food additive and determine to what extent its use is authorized,
- whenever a supplementary food additive or an increase in the dosage of a food additive is requested, the petitioner must prove that the food additive in the quantities requested is not dangerous for health, that it is technologically justifiable, and does not confuse the consumer as to the nature of the foodstuff in question.

The French proposition for the section ADDITIVES is as follows:

### (a) Acidifying Agents:

- acetic acid
- potassium acetate
- sodium acetate
- calcium acetate
- lactic acid
- malic acid
- ascorbic acid
- sodium ascorbate
- calcium ascorbate

- sodium lactate
- potassium lactate
- calcium lactate
- citric acid
- sodium citrates
- calcium citrates
- potassium citrates
- tartaric acid
- sodium tartrates
- potassium tartrates
- di sodium and potassium tartrate

(b) Firming agents

- calcium chloride
- glucono-delta-lactone

## 7 WEIGHTS AND MEASURES

7.1.1. This paragraph should be completed as follows: "When tomatoes are processed in glass containers, the water capacity should be reduced by 20% before calculating the percentage specified in the preceding paragraph".

7.1.4. The wording of the paragraph proposed in point 7.1.1 should be repeated here.

## LABELLING

8.2.1 The goods description "canned tomatoes" is not used commercially. The description used should be "tomatoes". This should be completed by the comments specified in paragraphs 8.2.2. to 8.2.6.

8.2.2 (a) Replace "peel" par "skin"

8.2.2 (b) Juice should be added as packing medium in this paragraph, and not in paragraph 8.2.6. (b).

8.2.3 The style "whole" specified in 8.2.4 should be specified in 8.2.3.

8.2.6. *Solid pack*

8.2.7. Labelling of containers not intended for retail: this paragraph should be included, using the wording already specified in other Codex standards.

## United Kingdom

### 2.1 PRODUCT DEFINITION

(c) .....and may or may not have ~~shall have~~ been cored, ~~except where the internal core is insignificant as to texture and appearance'~~

We feel that this statement is inappropriate as we understand from our Industry that for example in Italy, a large supplier to the UK, most tomatoes are currently not cored. We therefore suggest the deletion of the final part of the sentence as indicated above.

### 3.1.2 Packing media

(c ) We suggest the words '~~Puree or Pulp~~: ....' be changed to 'Puree or Concentrated Tomato Juice (Pulp): tomato puree or concentrated tomato juice (containing not less than 8% but less than 24% tomato soluble solids)'.

Many premium products on the market are packed in a concentrate juice (10-12% tomato solids) and the use of the term 'in tomato pulp' on the label would not be in keeping with the image of the product.

### 3.3.1 Definitions

3.3.1.1 Suggest this be amended to '**Whole or almost whole**: .....but not to the extent that there is a ~~material loss of placenta~~' a substantial loss of shape'

### 3.3.4 Size or wholeness

We believe the proposed level that whole style must contain at least 80% of drained tomatoes in whole or almost whole units is in practice very difficult to achieve consistently. We would suggest the level be reduced to 75% m/m in whole or almost whole units.....

### 3.3.5 Allowances for defects

#### 3.3.5.3 *Mould count*

We would ask for clarification behind the proposed change to the methodology cited in the draft standard for the determination of the Howard Mould Count. The UK would prefer to retain the method in the current 1981 standard of AOAC method 965.41. This is the method cited in Volume 13 on Methods of Analysis and Sampling for determination of Howard Mould Count in canned tomatoes. We would suggest AOAC method 965.41 is the newer method (1965) than the one proposed AOAC 945.90 and it would seem some justification is required as to why CCPFV would want to accept an earlier method. However it would appear appropriate and advisable to seek the advice of CCMAS.

UK suggests section 3.3.5.3 be amended back to :-

Mould Count in accordance with AOAC method 965.41- See Codex Alimentarius Vol. 13. The juice or liquid portion may not have more than 50% positive fields.

## 8.2 THE NAME OF THE PRODUCT

8.2.2 (b) .....the packing material: add "concentrated tomato juice"

### Uruguay

a) The same question raised in the standard for tomato concentrates is raised here concerning the Howard Method for mold counts.

b) In numeral 4, the reference for the specific Codex Standard should be stated.



## (6) PROPOSED DRAFT CODEX STANDARD FOR CANNED TOMATO CONCENTRATES

The following comments have been received from Australia, Brazil, France, Poland and Uruguay.

### Australia

Under the Section headed by Description, point 2.1.3, currently states that "Tomato Paste" is to have a minimum solids content of 24%.

Australia does not support this provision, believing it to be too high. We consider that the natural tomato soluble solids content requirement should be reduced to 21% and a consequential amendment also made to reflect this in the definition of "Tomato Puree" in point 2.1.2.

Australia has an issue with the mould count specified in point 3.2.4.1.

Tomato paste is a concentrated product that undergoes considerable shearing forces during manufacture. This fragments any trace of mould and distributes the fragments of mould widely throughout the product. Similarly, the process of concentration reduces the volume of product through which the mould fragments are distributed, thereby causing an increase in the number of mould fragments per unit volume.

Canned whole tomatoes in tomato puree can have a count of 29% in six subsamples and 25% in all the subsamples, while tomato paste can only have 45% and 40% respectively in a product which is three times more concentrated than the tomatoes in puree.

Australia considers that the mould count requirement should be removed.

### Brazil

Adding the expression "accordance with good manufacturing practice" in order to make it clear that the exclusion of skins and others parts can be achieved under industrial GMP.

#### 2.1.1 Processed Tomato Concentrate is the product:

- (1) Prepared by concentrating the liquid obtained from substantially sound, mature red tomatoes (*Lycopersicum esculentum* P.Mill) strained or otherwise prepared to exclude skins, seeds, and other coarse or hard substances in the finished product in accordance with good manufacturing practice, and

Other changes needed:

**2.1.4** The concentration shall be 8 or more percent natural tomato soluble solids but not dehydrated to a dry powder or flake form.

~~**2.1.5** Salt and other suitable seasoning ingredients may be added.~~<sup>(1)</sup>

- (1) Already include as 3.2.1 Other Permitted Ingredients

#### 3.1.2 Other Permitted Ingredients

- (a) Salt (sodium chloride);
- ~~(b) Spices, flavoring, and dried aromatic plants (such a basil leaf or onions, etc.) but not sugars or others sweeteners;~~
- (c) Lemon juice (single strength or concentrated) used as an acidulant; ~~and~~
- (d) Water (to adjust final composition);
- (e) Sugars <sup>(2)</sup> maximum level 1%.

(2) We would like to recommend the inclusion of "sugars" as other permitted ingredients as permitted under Brazilian legislation for tomato concentrates and also permitted in Uruguay: Brazil (CNNPA 12/15 de 1978) and Uruguai. (Decreto del Poder Ejecutivo N°315/994 del 5 de julio de 1994 - Reglamento Bromatológico Nacional).

**3.2.4.1 Mould Count** (in accordance with AOAC Method 965.41).

The product shall be considered nonconforming if the mould counts of all of the subsamples are more than 70%.<sup>(3)</sup>

- (2) We would like to recommend a higher value for Mould Count considering that the AOAC method presents strong variation in different laboratories. Values does not represent any healthy and safety factor. Legislation in many countries reflects that products up to 70% can be commercialized and have different classification.

## 8.2 THE NAME OF THE PRODUCT

8.2.1 The name of the product shall be:

“Tomato puree” or Tomato pulp” if the food contains not less than 8% but less than 24% tomato soluble solids;

“Tomato paste” if the food contains not less than 24% tomato soluble solids, or

“Tomato concentrate” if accompanied by a declaration of the percentage of natural tomato soluble solids.

Just to add as a comment: In Brazil, Tomato concentrate that contains not less than 17%, but less than 25% of the natural tomato soluble solids are called “Extrato de Tomate”, a well known expression for this type of product.

## France

### 3- SCOPE

Unlike other products covered by Codex standards, concentrates intended for future processing should be included here. It should be noted that the major part of world sales is carried out using large size casks and containers.

The text in French should be the same as the text already accepted in other Codex standards (e.g. canned pears), that is to say:

"This standard applies to the product as defined in Section 2 below intended for direct human consumption including catering purposes, or for repacking if required".

Add: This standard also applies to this product when indicated as being intended for further processing".

## 9 DESCRIPTION

### 9.1 Product definition:

2.1.1.

- (1): *Lycopersicum* should be replaced by *Lycopersicom*

- (2): In the French version the text should read: " preserved by physical means".

2.1.2., 2.1.3., 2.1.4. In the French version, the expression "natural tomato soluble solids content" should be replaced by: "soluble solids content". This should always be understood as being exclusive of salt.

2.1.2: In the European community the minimum solids content is 7% and not 8%. In retail trade the goods description depends on the soluble solids content, and depending on the level of concentration the product is called "puree" or "paste". The trade name "sauce" is not a generic trade name, and the term "pulp" refers to non-strained products. The French proposition is as follows:

2.1.2. "Tomato puree: concentrated tomato puree that contains more than 7%, but less than 22% of soluble solids content, excluding salt and other added ingredients".

2.1.3. " Tomato paste: concentrated tomato paste that contains at least 22% or more of soluble solids content, excluding salt and other added ingredients".

2.1.4. 8 % should be replaced by 7 %.

2.1.5. This point should be deleted, it pertains to 3.1.2.

## 10 ESSENTIAL COMPOSITION AND QUALITY FACTORS

### 3.1.2

(a) Salt: it is essential to lay down a maximum limit for salt; in the EU this limit is 15% in weight for tomato concentrates containing more than 20% solids content, and 3% in weight for other concentrates.

Specify "dry aromatic herbs and dry aromatic herb extracts".

(b): The possibility of adding other ingredients and flavors should be limited, otherwise the product will no longer be a tomato concentrate but tomato sauce.

### 3.2. Quality criteria:

3.2.1. Color: color is a very important criterion for tomato concentrate. It would be a good idea to develop measurable color criteria, and a proposition for this could be made during a meeting.

In this paragraph "8" should be replaced by "7".

3.2.3. Flavor: after "strange flavor" the following should be added: " in particular, a burnt or caramelized flavor".

Several other quality criteria should be added:

- sugar content, making it possible to evaluate the maturity of the basic ingredient, and the defect corresponding to the burnt flavor;
- total titratable acidity, making it possible to check the quality of the basic ingredients and the level of acidification;
- the PH

The French proposition, in compliance with community regulations, is as follows:

"3.2.4. Sugar content: sugar content expressed in invert sugar must equal at least 42% in weight of the solids content, excluding any added salt".

"3.2.5. Total titratable acidity: this is expressed in crystallized monohydrate citric acid, and should not exceed by 10% in weight the soluble solids content, excluding any added salt".

### 3.2.4 Defects:

Defects are related essentially to color and impurities. These can only be natural vegetal impurities that are impossible to detect with the naked eye, and which can only be seen under a microscope, when correct manufacturing procedures have been carried out.

Paragraph 3.2.4. should read as follows:

"Tomato concentrate should be free of any visible extraneous plant material, this including skin, pips and any other objectionable material, and should be practically free of mineral impurities.

These conditions are fulfilled when:

- (a) the presence of any extraneous plant material cannot be detected by the naked eye, and can only be seen under a microscope;
- (b) the mineral impurity content does not exceed 0,1 % of the soluble solids content, excluding salt."

### 3.2.4.1 Mould count:

As well as the comments made relating to canned tomatoes as far as conditions of production are concerned, some comments on manufacturing conditions should be added.

These are different in the United States and in Europe; during processing, the tomatoes are crushed and then strained; in the United States the mesh of strainers is not as fine as those in Europe; hence the mould is less well distributed since the product is less fragmented. For this reason the result of a Howard's test for an identical product will be different.

With this in mind, the provisions laid down in the European regulations should be applied:

"3.2.1.4. The mould count in tomato concentrate, diluted in water until the solids content reaches 8%, should not prove more than 70% positive."

## 11 ADDITIVES

The paragraph as it stands is unacceptable.

During the 34th session of the Codex Committee on Food Additives and Contaminants (CCFAC), the Committee asked that thought be given to the subject of coherence between product standards and the General Standard for Food Additives (GSFA). A workshop supervised by France and the United States has been set up to discuss this issue, and to propose modifications to be made to the preamble to the GSFA.

France's position was made clear during these workshops, being based on the principles laid down in the Procedures Manual, in the chapters "Guidelines pertaining to the procedure for acceptance of standards" and "inter-committee relations", the main principles governing the use of food additives adopted by the Codex Alimentarius Committee during the 9th Session, and the preamble to the Codex General Standard for Food Additives (Codex Stan 192-1995 Rev 2 -1999). This viewpoint can be summarized as follows:

- the Codex Committee on Processed Fruit and Vegetables is responsible for evaluating the technological necessity and the safety in usage of food additives as proposed in the draft standard,
- the Committee shall examine each food additive and determine to what extent its use is authorized,
- whenever a supplementary food additive or an increase in the dosage of a food additive is requested, the petitioner must prove that the food additive in the quantities requested is not dangerous for health, that it is technologically justifiable, and does not confuse the consumer as to the nature of the foodstuff in question.

The French proposition for the section ADDITIVES, based on the provisions laid down in the modified community standard 95/2, is as follows:

(b) Acidifying agents in order to maintain the PH = 4,5:

- acetic acid
- potassium acetate
- sodium acetate
- calcium acetate
- lactic acid
- malic acid
- ascorbic acid
- sodium ascorbate
- calcium ascorbate
- sodium lactate
- potassium lactate
- calcium lactate
- citric acid
- sodium citrates
- calcium citrates
- potassium citrates
- tartaric acid
- sodium tartrates
- potassium tartrates
- disodium and potassium tartrate

## 7 WEIGHTS AND MEASURES

The proposition as expressed in the standard for canned tomatoes pertaining to the filling of glass containers should also be mentioned here.

7.1.1. This paragraph should be completed as follows: " When the tomatoes are processed in glass containers, the water capacity should be reduced by 20% before calculating the percentage specified in the preceding paragraph".

## 8 LABELLING

It is not necessary here to repeat the criteria already mentioned in 2.1.

Furthermore, the French translation is wrong and does not correspond to the English version.

8.2.1 The consumer should be able to determine easily from the goods description whether the product is tomato concentrate or tomato paste, and the solids content should be specified in compliance with paragraph 2.1.2 ; paragraphs 8.2.1 and 8.3 should be simplified and replaced by:

"8.2.1. The goods description should specify " tomato puree" or "tomato paste" together with

- either the indication: " concentrate (x) % (corresponding to minimum percentage of solids content), or the specification of a variation margin of 2% in relation to the soluble solids content (e.g.: concentrate 20 to 22%).

### Poland

Concerning maximum levels of heavy metals in processed fruit and vegetables we would like to inform you that additional limits for mercury, arsenic and zinc are established in the Polish food regulations as follows:

- for tomatoes concentrates:

Hg - no more than 0,02 mg/kg

As – no more than 0,20 mg/kg

Zn – no more than 30 mg/kg

Pb – no more than 0,50 mg/kg

Cd - no more than 0,05 mg/kg

### Uruguay

In numeral 4, the reference for the specific Codex Standard should be stated.

a) A definition should be given for the natural tomato soluble solids.

b) Uruguay would like to know what references were the bases for changing the values of acceptance for the mold count with the Howard Method.

**(7) PROPOSED DRAFT CODEX STANDARD FOR CANNED VEGETABLES**

The following comments have been received from Egypt, Poland, Uruguay., and the United States

**Egypt**

Item No. 2.1 (b) with respect to the minimum internal negative pressure of 300-500 millibars for containers with a capacity 2550ml.

We suggest the minimum negative pressure to be 100 mm. mercury in all container capacities.

**Poland**

Concerning maximum levels of heavy metals in processed fruit and vegetables we would like to inform you that additional limits for mercury, arsenic and zinc are established in the Polish food regulations as follows:

- for processed fruit, except juices and tomatoes concentrates:

Hg - no more than 0,02 mg/kg

As – no more than 0,20 mg/kg

Zn – no more than 15 mg/kg

Pb – no more than 0,30 mg/kg

Cd - no more than 0,03 mg/kg

**Uruguay**

a) In this draft, the styles and denominations of the products are not in complete agreement with the specific standards. This is the case for CODEX STAN 144-1985, for canned palmito.

b) In paragraph 7.2, the minimum drain weights for canned vegetables are too strict and detailed for each one of the specific cuts and styles of vegetables. This may result in some products being considered as non-complying with the standard or defective, thus presenting difficulties in trade.

Uruguay proposes that the minimum drained weight should not be less than 50% for canned vegetables.

c) The additives defined are more limiting and the firming agents are approved only for peas. The INS for stannous chloride does not correspond.

**United States****General Comments.**

The United States is pleased that the CCPFV decided to combine the standards for several canned vegetables into one. The addition of more vegetables to this draft standard is commendable, and should result in a standard that represents the wide range of processed vegetables traded. Although the proposed draft standards has combined and revised previous standards, the proposed draft standard must be compatible with industry practices that were set in the previous standards and not create new restrictions, or impediments, or result in increased cost to the industry and the agricultural sector of Codex Member States.

**2.1 (a) Product Definition**

The definition should indicate that canned vegetables can be prepared from fresh or frozen product. It is common industry practice to freeze certain vegetables for maintaining quality during storage. The proposed draft standard should allow the continued use of manufacturing canned vegetables from sound frozen vegetables. Therefore the sentence should read as follows;

Prepared from fresh (barring mature processed peas), frozen and sound vegetables ...

**2.2. Specific Definitions of Products.**

The United States is very concerned that “green beans” (*Phaseolus Coccineas L*) is being omitted from the proposed draft standard. This is a major commercial canned vegetable for the United States and several other countries. Therefore, the United States is requesting that it is included in the draft Codex Standard.

**(8) PROPOSED DRAFT GUIDELINES FOR PACKING MEDIA FOR CANNED VEGETABLES**

No comments were received.