

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 3(a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

*22nd Session,
Washington, DC metro area, U.S.A., 27 September – 1 October 2004*

DRAFT CODEX STANDARD FOR PICKLED PRODUCTS

**Comments have been received from
Egypt, France, Iran, Malaysia, New Zealand, Switzerland, United States, and Venezuela.**

EGYPT

Accepts the Draft Codex Standard for Pickled Products.

FRANCE

As specified at the 21st Session of the Codex, the hereby defined product does not match the definition of pickled products; it is in fact a kind of oil or brine-based condiment made from various vegetables, cereal grains and/or legumes. The Draft Standard's Scope remains ill defined in spite of changes made.

As mentioned by the Secretariat, the following text items still need to be refined:

- Scope
- Sweeteners
- Packing Media
- Additives
- Weight and Measures
- And Labeling

IRAN

3.3 For pickled products in brine, with regard to some kind of products (Olive , Okra) , the maximum pH of the product shall not exceed 4 and acidity shall not less than .5

3.3.(b) The maximum percentage of salt in covering liquid shall not exceed 10 % by weight.

7.1 With regard to Olives for all different packaging media, the minimum drained weight 50 is recommended.

MALAYSIA

1. SCOPE

Malaysia agrees with the recommendation of the Codex Secretariat to replace the whole Section 1 Scope with the following text :

“This Standard applies to pickled products 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”

2.1 PRODUCT DEFINITION

(b) Malaysia proposes to delete the sentence in Section 2.1. (b) ‘.....*with ingredients appropriate to the type in order to ensure preservation of the product and its quality*’ and replace with the sentence ‘.... *or treated to produce an acidified product depending on the type, appropriate ingredients are added in order to ensure preservation of the product and its quality*’. Section 2.1. (b) will read as :

“(b) subjected to curing, processing or treated to produce an acidified product depending on the type, appropriate ingredients are added in order to ensure preservation of the product and its quality”.

3.1.1 Basic Ingredients

Malaysia proposes the inclusion of ‘*Potable water*’ and the ingredients to be listed to ensure consistency with other Codex standards. The section will read as follows:

1. Edible fruits, vegetables, cereals and/or legumes
2. Spices and condiments; and/or
3. Potable water in a liquid medium in combination with one or more of the optional ingredients listed in section

3.1.2 Optional Ingredients

Malaysia is of the view that seasoning of animal type should not be allowed as this product is of plant origin or else a declaration on the label should be provided. Malaysia proposes to delete ‘(seasoning has two types: plant origin and animal origin)’

Malaysia proposes the deletion of ‘*nutritive sweeteners*’ from the list of Optional Ingredients in **Section 3.1.2.** until CCPFV has agreed on the definition of the term ‘*nutritive sweeteners*’ (refer to CX/PFV 04/22/3 –General Considerations for Codex Standard for Processed Fruits and Vegetables and Specific Considerations for Draft Codex Standard for Pickled Products).

This is in accordance with the decision of the Committee when revising the Codex Standard for Canned Applesauce, that the term '*sugars or nutritive sweeteners*' appearing in the Standard should be replaced by '*sugars as defined in the Codex Alimentarius and/or other carbohydrate sweeteners such as honey*' and to apply this decision to all Codex standards for processed fruits and vegetables (ALINORM 99/27, para 16 and CX/PFV 04/22/3 para 6).

Malaysia proposes the optional ingredients to be listed to ensure consistency with other Codex standards. This Section should read as follows:

1. Sugars (as defined in Codex Standard for Sugars CX-STAN 212-1999, Amd.1-2001)
2. Unrefined nutritive sweetener
3. Honey (as defined in Codex Standard for Honey - CODEX STAN 12-1981, Rev.1 (1987), Rev. 2 (2001))
4. Edible vegetable oils
5. Vinegar
6. Citrus juice
7. Dried citrus
8. Malt extract
9. Salt
10. Brine
11. Chillies
12. Seasoning (~~seasoning has two types: plant origin and animal origin~~)

4.0 FOOD ADDITIVES

4.1. Acidity Regulators

Malaysia proposes the deletion of "*INS 350 Malic Acid*" to be replaced with "*INS 296 Malic Acid (DL-)*".

4.3. Colours

Malaysia proposes the inclusion of Tartrazine (INS 102) at ML of 500mg/kg as the General Standard for Food Additives (GSFA) allows food category '*04.2.2.3 Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweeds in vinegar, oil, brine, or soy sauce*'. The sentence should read as;

INS No.	Name of Food Additive	Maximum Level
102	Tartrazine	500 mg/kg

NEW ZEALAND

New Zealand notes that [this] code refers to the Codex General Principles of Food Hygiene, and Codes of Hygienic Practice and Codes of Practice.

It is suggested that, where Hygiene Codes are referred to and do not contain relevant food safety requirements, this information should be included in the Standard. We suggest that this information should be about particular food safety hazards associated with the food products.

This information will be useful to the users of the end-document when developing their HACCP programme.

SWITZERLAND**Introductory Remarks**

Switzerland agrees with most of the proposed amendments. However, we do have some specific comments that we have outlined as follows:

1. SCOPE

Switzerland agrees with the proposal put forward in para. 26 of document CX/PFV 04/22/3 i.e. to amend the Scope of the Draft Codex Standard for Pickled Products. However, we would also like to propose the inclusion of table olives in the proposed Scope since they are already covered in the Codex Standard for table olives (Codex Stan 66-1981 (Rev. 1-1987)). The proposed Scope would read as follows:

"This Standard applies to pickled products 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. This Standard does not cover pickled cucumbers, kimchi and table olives."

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS**3.1.2 Optional Ingredients**

Nutritive sweeteners and unrefined nutritive sweeteners:

"Nutritive sweeteners" and "unrefined nutritive sweeteners" are mentioned as optional ingredients. However, the kind of ingredients covered by these terms is not clear. We would therefore propose to define the ingredients covered by the terms "nutritive sweeteners" and "unrefined nutritive sweeteners" or to refer to an existing Codex Standard i.e. "sugars as defined in the Codex Standard for Sugars (CODEX STAN 212-1999 (Amd. 1-2001))" or "honey as defined in the Revised Codex Standard for Honey (CODEX STAN 12-1981, Rev. 1 (1987), Rev. 2 (2001))".

Dried fruit:

"Dried" fruit are mentioned as an optional ingredient. In our opinion, all types of fruits (whether dried or fresh) could be used in the preparation of pickled products. We would therefore like to propose the deletion of the term "dried" as follows: ~~dried~~-fruit

Chillies:

"Chillies" are mentioned as an optional ingredient. Specified spices are not usually used in Codex Standards. In order to use established Codex terms as well as to avoid restricting the type of recognized herbs and spices which can be used as "optional ingredients", we would like to propose the replacement of the term "chillies" by the term "spices" in the list of "Optional Ingredients".

Brine:

Brine is mentioned as an optional ingredient. Brine, the liquid obtained from water and salt, is mentioned as an optional ingredient and as a packing media. In our opinion, brine should describe the packing media and the components of brine, water and salt, should be listed as optional ingredients. We would therefore like to propose to replace the term "brine" by the term "water".

7. WEIGHT AND MEASURES**7.1.1 (a) Pickled products in edible oil**

The Subsection 7.1.1 (a) defines that the drained weight of the basic ingredient in the final product shall not be less than 60% by weight. In our opinion, the drained weight of the final product as mentioned in (b) and (c) of this subsection is important. We would therefore propose to replace the sentence under Subsection 7.1.1 (a) "The basic ingredient in the final product shall not be less than 60% by weight" by the sentence "the drained weight of the final product shall not be less than 60% by weight".

8. LABELLING**8.2.2.**

This subsection refers to three types of pickled products given in Section 3 of this Standard. However, the kind of products covered by these three types is not clear, although we suppose that the products packed in the three different kinds of packing media are meant. We would therefore like to propose to change the referred Section number 3 in the number 3.3. The proposed Subsection 8.2.2 would read as follows:

"In case of pickled products not covered under the three types as given in Section 3.3, they must be labelled as "Mango Pickle" or Pickle-Mango".

UNITED STATES

General Considerations for Codex Standards for Processed Fruits and Vegetables (CX/PFV 04/22/3)

Sweeteners

The U.S continues to support references to sugars in Codex standards as "*sugars as defined in the Codex Alimentarius and/or other carbohydrate sweeteners such as honey*" and for the CCPFV to apply this decision to all appropriate Codex standards for processed fruits and vegetable. We recommend the appropriate lateral Codex committees (CCFAC, CXS and JECFA) make the final determination which and when such substances are used as food ingredients for sweetening purposes, or as a food additive for sweetening purposes in a consistent manner in Codex standards for processed fruits and vegetables.

Codex objective of keeping consistency within the Codex system vis-à-vis the terms used in different national/ regional legislations to designate these substances is strongly supported by the United States. Therefore, reference to compounds which are not considered as food additives but performing sweetening functions are regarded as a food/food ingredient and listed under the Section on Essential Composition and Quality Factors - be approved by the appropriate Codex committee prior to inclusion in standards developed by the CCPFV; or the CCPFV seeks the recommendation/guidance from appropriate Codex committees on such matters.

The CCPFV is commodity based committee and should not be tasked with matters and responsibilities that are more relevant to other Codex committees.

Packing Media

The United States whole heartedly concurs with the decision taken at the 23rd Session of the Codex Alimentarius Commission (July 1997) to revise and simplify existing Codex commodity standards as much as possible, and that the elaboration of specific commodity standards or detailed requirements should be only undertaken when adequately justified. But, does not believe that a separate document containing Guidelines for Packing Media for Canned Fruit and Vegetables as proposed by the 19th Session of the CCPFV (March 1998)- furthers the Codex objective of simplifying the standards.

Instead the U.S recommends:

1. That provisions for packing media for canned fruits and vegetables be annexed to the proposed Commodity Standard. This results in the user friendliness of the standard.
2. That the wording in the Section on Packing media be changed to “**Recommended** Packing Media for Canned Vegetables”

Food Additives

U.S. prefers option b:

The reference to the GSFA by inserting a general statement under the relevant food additive category.

The US recommends that the CCPFV follow its mandate from the Commission to simplify the standards the committee develops to essential quality and fill criteria and utilize the Codex general standards (labeling, hygiene, food additives, contaminants, etc.) as much as possible.

The US recommends that the Committee use the following two-step process to guide the Committee’s discussion.

1. The CCPFV should first resolve questions regarding the technological need for food additive functional classes in these standards. We recommend that this discussion should be based on the following principles:
 - a. The technological need for the food additive functional classes in the existing standard is justified. Members of the CCPFV that question the need for a food additive functional class in the existing standard are responsible for providing a justification to the CCPFV explaining why a particular food additive functional class is no longer justified.
 - b. The technological need for additional food additive functional classes should be provided to the CCPFV with a justification.
2. Once the need for particular functional classes of additives has been resolved, then the CCPFV should try to resolve questions relating to specific food additives (i.e., revisions to the list of food additives and their maximum use level), we recommend that the CCPFV discussion be guided by the following principles:
 - a. Only additives assigned a full ADI by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) are eligible for inclusion in the standard.
 - b. The food additives listed in the existing standards are justified. Members of the CCPFV that question a specific food additive or its level of use in the existing standard are responsible for providing a justification to the CCPFV explaining why a particular food additive or its use level in the existing standard is no longer justified.

- c. Once the technological need for a food additive functional class is established, then information supporting additional food additives (to that functional class) and their maximum use levels necessary to achieve a particular technological functional effect should be provided to the CCPFV for further discussion.

Consistent with the Codex General Principles for the Use of Food Additives (XOT-1) and the Preamble to the Codex General Standard for Food Additives (CX-STAN 192), justifications for a food additive functional class, or supporting information about any additional food additive and its use level should address the following questions:

1. Will the functional class or additive preserve the nutritional quality of the food;
2. Will the functional class or additive provide necessary ingredients or constituents for the food;
3. Will the functional class or additive enhance the keeping quality or stability of a food or to improve its organoleptic properties, provided that this does not so change the nature, substance or quality of the food as to deceive the consumer; or
4. Will the functional class or additive provide aid in the manufacture, processing, preparation, treatment, packing, transport or storage of food, provided that the additive is not used to disguise the effects of the use of faulty raw materials or of undesirable (including unhygienic) practices or techniques during the course of any of these activities?

We believe this approach will expedite the work of the CCPFV and ensure that the CCPFV deliberations are transparent and are consistent with the working principles of Codex.

Contaminants

The United States supports the current trend in Codex to refer to “Contaminants” in general terms, and recommends the CCPFV to do the same.

Specific Comments on the Draft Codex Standard for Pickled Products

Title/Name of Standard

The US recommends that the title of the standard be revised to “Pickled Fruit, Vegetable and Related Products” for clarity purposes. There are many types of pickled products including meat, poultry and fish that are not included in this standard and are outside the terms of reference of the CCPFV.

Scope

The United States concurs with the decision to limit the standard to “Products for direct consumption offered for sale in a covering medium” and does not apply to products for further processing, pickled cucumbers or kimchi.

4. Food Additives

This section should reference the appropriate Codex Tables (1,2 &3) in general terms as suggested in paragraph 20 -22 of CX/PFV 04/22/3

The US can agree with the proposed food additive uses in the standard. However, we recommend that all of the benzoates (INS 210, 211, 212, and 213), sorbates (INS 200, 201, 202, and 203) and sulfites (220-225, 227, 228, and 539) be included in the list of acceptable preservatives in this standard.

We note that the CAC has already adopted provisions for the use of several colors (Caramel Colour Class III & IV, Fast Green FCF), antifoaming agents (polydimethylsiloxane), firming agents (aluminum ammonium sulfate), preservative/sequestrant (EDTAs INS 385, 386). We recommend that the CCPFV consider these additional additive technical effects are justified and whether the specific adopted provisions in the GSFA be maintained in the Codex standard for pickled products.

The US recommends that food additive sweeteners be included as acceptable for use in foods conforming to this standard.

The GSFA separates fruits heading no. 04.1.2. from vegetables heading no. 04.2.1. and the CCPFV should pay closer attention to this separation in listing additives and preservatives for pickled products. Therefore the U.S. suggests that the CCPFV forward the list of additives and preservatives for this standard and every other PFV standard to CCFAC for final determination.

VENEZUELA

1. SCOPE:

“This Standard applies to pickled products 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. This Standard does not cover pickled cucumbers and kimchi.”

2. DESCRIPTION

2.1 Product Definition

“Pickled Products” is the **natural** product:

- (a) prepared from **sound, clean and edible** fruits, vegetables, cereals, legumes, spices and condiments;
- (b) subjected to curing **and processed with ingredients appropriate to the type of product;**
- (c) **processed and preserved in an appropriate manner, in a suitable packing medium, with ingredients appropriate to the type and variety of the pickled product.**

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 COMPOSITION

3.1.2 Optional Ingredients

Nutritive sweeteners, **refined or unrefined**, edible vegetable oils, vinegar, citrus juice, dried fruits, malt extract, salt, brine, chilies, seasonings **of plant and/or animal origin**.

3.2 PACKING MEDIA

3.3.1 Pickled products in edible oil

The percentage of oil in the product shall not be less than 10% by weight.

3.3.2 Pickled products in brine

The percentage of salt in the packing medium shall not be less than 10% by weight, when salt is used as a major preserving agent.

3.3.3 Pickled products in acidic media

The acidity of the packing media shall not be less than 2% by weight, calculated as acetic acid.

In all packing media, the product shall not exceed a pH of 3.7.

4. FOOD ADDITIVES

4.2 PRESERVATIVES

INS No	NAME OF FOOD ADDITIVE	MAXIMUM LEVEL (ADI) (Expressed as mg/kg)
E 210	Benzoic acid	5*
E 211	Sodium benzoate	
E 212	Potassium benzoate	
E 200	Sorbic acid	25**
E 203	Sodium sorbate	
E 202	Potassium sorbate	
E 221	Sodium sulphite	0.7***
E 224	Potassium metabisulphite	NA

* Expressed as benzoic acid.

** Expressed as sorbic acid.

*** Expressed as sodium sulphite.

NA: Not assigned. There are several reasons to not assign an ADI. One is the lack of information, and another is when data requires completely stopping the use of a food additive or drug due to its adverse effects.