

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 3(a)

CX/PFV 06/23/4-Add.1  
October 2006

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES**

**23<sup>rd</sup> Session**

**Arlington, VA (Washington DC metro area), U.S.A.,  
16 – 21 October 2006**

**E**

**DRAFT CODEX STANDARD FOR PICKLED FRUITS AND VEGETABLES**

**(AT STEP 6)**

**Comments from Australia, Brazil, Cuba, France, and Switzerland**

**AUSTRALIA**

Australia believes that the work of all Codex Committees should adhere to the key priority espoused in the Strategic Framework of Codex, namely to:

- *provide essential guidance for member countries through the continued development of international standards and guidelines relating to food safety and hygiene, nutrition, labelling and import/export inspection and certification systems and for the practical application of the concepts of equivalence and mutual recognition.*

Australia considers that Codex commodity standards should be based on sound science and essentiality criteria, provide maximum flexibility and should avoid wherever possible establishing quantitative limits for quality. Quality provisions are fundamentally driven by commercial and market requirements and Codex standards should not constitute a barrier to trade.

## **Specific Comments**

### **2.2 Styles**

- As previously stated, Australia considers that Codex commodity standards should be based on essentiality criteria. They should include only definitions and essential technical criteria that ensure safe food and fair practices in food trade. Australia believes that the provisions for styles do not impact upon food safety and therefore should not be included in the standard. To ensure consumers are not misled, Australia proposes that a labelling provision for presentation style be included under Section 8.1.
- Moreover, Australia believes that the inclusion of Section 2.2.8 Other Styles, allowing for the introduction of any other presentation of the product, makes the other sections defining style redundant and considers that any inclusion of style definitions is unnecessarily prescriptive and increases the complexity of the Standard. Australia therefore proposes that all Style sections within the Standard be deleted.

### **4. Food Additives**

- In general Australia believes that additive permissions listed in commodity standards should not duplicate permissions included in the General Standard for Food Additives (GSFA). Australia therefore generally supports the inclusion of a general statement referring to the GSFA under the food additives section of standards developed by the CCPFV.
- Whilst the position outlined above is Australia's general position, Australia notes the decision made at the last session of the CCPFV to keep a list of individual provisions for food additives subject to endorsement by the CCFA and inclusion in the GSFA, until the CCFA has resolved the issue of the relationship between Codex commodity committees and the GSFA.

- In adopting this approach and as suggested by the Codex Secretariat in their comments, Australia believes that the Committee should take into account provisions of the GSFA when considering food additive provisions in individual commodity standards.

#### 4.1 Acidity Regulators

- Australia considers any additive in the GSFA that may function as an acidity regulator should be permissible to the levels prescribed and that this should be clarified in the Standard.

#### 4.2 Preservatives

- The draft permits sulphites to 100mg/kg. Australia allows sulphur dioxide and sodium and potassium sulphites to a limit of 750mg/kg in products made from bleached vegetables. Australia therefore requests that a similar provision for these preservatives be included in the standard, as follows:

INS No.	Name of the Food Additive	Maximum Level
220, 221, 222, 223, 224, 225, 227, 228, 539	Sulphites	100 mg/kg <b>750mg/kg (for use in products made from bleached vegetables)</b>

#### 4.9 Sweeteners

- The draft permits Acesulfame Potassium to 200mg/kg. JECFA provides an ADI of 0-15mg/kg bw for this additive. Australia allows Acesulfame Potassium to a limit of 3000mg/kg in these products. Given the relatively high ADI for this sweetener, Australia requests that a level of 3000mg/kg be permitted.

#### 8.1 Name of the Product

- As stated in comments against Section 2.2, Australia suggests the inclusion of a second paragraph under Section 8.1 relating to labelling provisions for styles, as follows:

*“The presentation style shall be declared as part of the name or in close proximity to the name of the food.”*

#### **BRAZIL**

Para 3 – Brazil would like to know the scientific name of “green mustard” and to clarify whether this product is traded in global or regional basis, besides the list of tropical countries where this product is grown.

Para 4 – Brazil agrees with the proposals of the Working Group.

Para 5 – Brazil agrees with the proposals of the Working Group.

Para 6 – Brazil agrees with the proposals of the Working Group.

Para 7 – Brazil agrees with the proposals of the Working Group.

Paras 8, 9 and 10 – Brazil agrees with the proposals of the Working Group. Brazilian legislation RDC ANVISA, HEALTH MINISTRY n° 272/05 states the same.

Para 11 – Brazil agrees with the proposals of the Working Group.

Para 12 – Brazil agrees with the proposals of the Working Group.

Para 13 – Brazil agrees with the proposals of the Working Group.

Para 14 – Brazil has comments in Annex I.

Para 15 – Brazil agrees with the proposals of the Working Group.

Para 16 – Brazil agrees with the proposals of the Working Group.

Para 17 – Brazil agrees with the proposals of the Working Group.

Para 18 – Brazil agrees with the proposals of the Working Group.

#### COMMENTS TO ANNEX I

Section 3.2.1.4 – Definition of defects - (a) Blemishes -, & (b) Harmless extraneous material; and Section 3.2.1.5 – Defects and Allowances – Brazil suggests that a numerical level should be proposed. In addition, all the defects and their maximum level values should be listed in a table to keep the document simple and in line with CX/PFV 06 23/8 and other CODEX Standards (for example CODEX Standard 241-2003 – canned bamboo shoots).

Section 7.1.1 – Minimum Fill -, and Section 7.1.4 – Minimum Drained Weight. Brazil has glass containers specially designed for an easy opening that can not attend the 90% minimum fill capacity as stated in the draft.

Justification: There is a minimum 6mm head space (space between the border of the container and the top of the liquid packing media), designed to meet the specified 609.55 millibars to a vacuum packed product in Brazil (pickled onions, among others) in the easy open containers.

Among the smaller containers (less than 200mL), being the specified width higher than the height, the minimum fill of 90% can not be achieved due to the specified 6mm head space for the easy open containers (higher than 10% of the capacity of the container), as previously stated.

For example: Glass container with an easy open design (Brand – Nadir Figueiredo. Specification 33-02). Maximum capacity (156mL). Diameter (73.4mm). Height (52.5mm). Head space (6mm).

$$\text{Head Space volume} = [ r^2 \text{ (mm)} \times 3,1415 \times \text{head space (mm)} ] / 1000$$

$$r = 73.4\text{mm} / 2 = 36.7\text{mm}$$

$$\text{Head Space volume} = [ 36.7^2 \text{ (mm)} \times 3,1415 \times 6 \text{ (mm)} ] / 1000 = 25\text{mL approximately.}$$

**Occupied volume (%)**

$$156 - 25 = 131\text{mL} = 83.9\%$$

There will remain a **16.1% unfilled space in the container.**

As explained before there will be some Brazilian products that will not comply with the proposed Standard, as stated in Section 7.1.1 and 7.1.4.

Brazil suggests that the minimum fill proportion be a function of the container capacity and the head space specification designed to achieve a vacuum packed easy open container.

## COMMENTS TO ANNEX II

CODEX Secretariat Proposal to Section 1 – Scope – Brazil agrees with the proposal of the CODEX Secretariat and, to a broader definition, to let the Standard clear and open to further innovation, also agrees with the Secretariat that the text in italics should reflect the standardized language usually applied across CODEX Standards for processed fruits and vegetables. This should lead to the exclusion of the proposed list of covered products by this Draft CODEX Standard; besides, the list of exceptions should also be substituted by the text: “This Standard does not cover products with their specific CODEX Standard as pickled product.”

CODEX Secretariat Proposal to Section 2.1(a) – Product definition – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 2.1(b) – Product definition – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 2.1(c) – Product definition – Brazil suggests to add the word safety to the text: “..., so as to ensure the quality, safety and to prevent spoilage;”

CODEX Secretariat Proposal to Section 2.1(d) – Product definition – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 3.1.1 – Basic ingredients – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 3.1.3 – Other permitted ingredients – Brazil has no comments.

CODEX Secretariat Proposal to Section 3.2 – Quality Criteria – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 3.3 – Classification of “Defectives” – Brazil agrees with the proposal of the CODEX Secretariat, but suggests that the previous comments about Section 3.2.1.4 (a & b); and Section 3.2.1.5 (ANNEX I) be considered.

CODEX Secretariat Proposal to Section 4 – Food Additives: general consideration – Brazil has no comments.

CODEX Secretariat Proposal to Section 4.6 – Flavour Enhancers (*natural flavourings*) Quality Criteria – Brazil agrees with the proposal of the CODEX Secretariat to establish a new Section 4.7 Flavourings, but would like to ask for clarification due to a three new definition proposal, 4.7 (a), (b) & (c) different from the original version.

CODEX Secretariat Proposal to Section 7.1.1 – Minimum Fill – Brazil agrees with the proposal of the CODEX Secretariat, but suggests that the previous comments about Section 7.1.1 (ANNEX I) be considered.

CODEX Secretariat Proposal to Section 7.1.3 – Lot acceptance – Brazil agrees with the proposal of the CODEX Secretariat, but suggests that the previous comments about Section 3.2.1.4 (a & b) and Section 3.2.1.5 (ANNEX I) be considered.

CODEX Secretariat Proposal to Section 7.1.4 – Minimum Drained Weight – Brazil agrees with the proposal of the CODEX Secretariat, but suggests that the previous comments about section 7.1.4 (ANNEX I) be considered. .

CODEX Secretariat Proposal to Section 8 – Labeling – Brazil agrees with the proposal of the CODEX Secretariat.

CODEX Secretariat Proposal to Section 9 – Methods of Analysis and Sampling – Brazil has no comments.

## **CUBA**

### **Scope**

We propose that the fruits and vegetables that would be covered by the Standard not be named since there are many that would be appropriate for processing these types of products, and it is not possible to name them all. For instance, in the present draft, some fruits and vegetables used in these types of products have been forgotten (e.g., carrots, pineapple, green beans, broccoli, grapefruit, orange, lemon, etc.) This would constitute a barrier to industrial practices, a limitation of the Standard. Only the fruits and vegetables which are not included or covered by the Standard should be mentioned in the draft; it should leave open the possibility to all of those that can be used. Also, relishes should not be mentioned among the products which are not covered by this Standard, so we propose deleting “*chutneys and relishes*”.

### **Section 2.1 – Product Definitions**

Substitute the word “herbs” with “aromatic plants”.

[This applies only to the Spanish version of the document]. Paragraph (d). Use a comma instead of a period to separate the decimal figures, and add decimal figures to the pH values: 2,0 - 4,0.

### **Section 3.1.1 – Basic Ingredients**

Substitute the word “herbs” with “aromatic plants”.

### **Section 3.1.3 – Other Permitted Ingredients**

Paragraph (j). We propose deleting the term “fish sauce” since there can be other appropriate sauces, and this sauce, as such, has not been defined in any document. The wording of the text could be as follows:

Seasoning (including soy sauce, tomato puree<sup>1</sup>, and other appropriate sauces).

**3.2.1.1 & 3.2.1.3** - The following must be applied to the Spanish version of the document:

- Include a space between the numbers and the percentage symbol (i.e., 10 %)
- Use a comma instead of a period for decimal figures, and write down the first decimal figure (i.e., 0,5-3,0 %)

On the footnote – Write “20 mL” (the letter “L” on the abbreviation for milliliters should be written as a capital letter.)

## **ANNEX II**

### **CODEX SECRETARIAT - SUGGESTIONS**

#### **General Comments:**

We consider it correct to use the term “pickled fruits and vegetables” throughout the text.

#### **Specific Comments:**

##### **Section 1 – SCOPE**

We reiterate our proposal to not limit the types of fruits or vegetables; and to not include names. Only mention those that are not covered by this Standard.

##### **Section 2.1 – Product Definitions**

**2.1 (a) (b) (c) (d).** We agree with the proposals.

##### **Section 3.1.1 – Basic Ingredients**

We consider it to be necessary to indicate the ingredients that have already been described in Section 2.1 (a).

---

<sup>1</sup> In accordance with the Codex Standard for Processed Tomato Concentrate (CODEX STAN 57-1981)

### Section 3.1.3 – Other Permitted Ingredients

The word “sweetener” should only be considered for food additives, while “sugars” should be considered for foodstuff. We support the term “foodstuff with sweetening properties” to describe foodstuff for sweetening purposes and support keeping it in the list of ingredients in accordance with the Codex General Standard for Labelling.

We also agree with the removal of “chillies” as they are already covered under vegetables.

We support the proposed wording of the text.

### Section 3.2 & 3.3

We support the proposed wording of the text.

### Section 7.1.1 – Minimum Fill

Non-metallic rigid containers should be included.

**Section 7.1.3 & 7.1.4** – We agree with the proposed wording of the text.

### Section 8 – Labelling.

We agree with the proposed wording of the text.

#### FRANCE

The English heading of this standard is “Pickled Fruits and Vegetables” while the French heading is “*légumes et fruits marinés fermentés*”. The latter should be retained and translated in other languages.

#### SWITZERLAND

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

#### 1. Scope

The scope in the present Draft is not really concise and not in line with the standardized language that is normally used under this Section. We would therefore like to propose the use of the definition given by the Codex secretariat in Annex II, CX/PFV 06/23/4. The text would therefore read as follows:

*This Standard applies to pickled fruits and vegetables, as defined in Section 2 below, and offered for direct consumption, including for catering purposes or for repacking if required. The products covered by this Standard include, but are not limited to onions, garlic, mango, radish, ginger, beetroot, royal plum, peppers, hearts of palm, cabbage, lettuce, lemons, baby corn (young corn) and green mustard. This Standard does not cover pickled cucumbers, kimchi, table olives, chutneys and relishes. It does not apply to the product when indicated as being intended for further processing.*

#### 2. DESCRIPTION

##### 2.1 Product definition

##### 2.1 (a) Edible fruits

In the Codex Procedural Manual under "GENERAL PRINCIPLES OF THE CODEX ALIMENTARIUS" it is stated that "Codex standards contain requirements for food aimed at ensuring for the consumers a sound, wholesome food product free from adulteration, correctly labelled and presented." In our opinion this provision includes the fact that foodstuffs are "edible". We would therefore like to propose the deletion of the term "edible" as follows: *edible fruits*.

##### 2.1. (b)

This Subsection contains the same information as written in the first sentence of the Scope in the Draft. In our opinion, the first sentence of the scope is more concise. We would therefore like to bring the text under this subsection in line with the first sentence of the Scope and to change it as follows:

*cured, processed or treated to produce an acid or acidified product preserved through natural fermentation or acidulants. Depending on the type, appropriate ingredients are added in order to ensure preservation and quality of the product.*

##### 2.1 (d)

This Subsection contains the information concerning the packing medium as written in the second sentence of the Scope in the Draft. In our opinion, the second sentence of the scope is more concise. We would therefore like to bring the text under this subsection in line with the second sentence of the Scope and to change it as follows:

*packed with or without a suitable liquid packing medium (e.g. oil, brine, or acidic media such as vinegar\*) as specified in Section 3.1.2, with ingredients appropriate to the type and variety of pickled product, to ensure an equilibrium pH of less than 4.6. However, the pH of natural fermentation pickled products shall be in the range of 2 – 4.*

## 2.2 Styles

### 2.2.8 (c)

This subsection contains labelling provisions aimed at preventing consumers from being misled. In our opinion, this subsection should be mentioned under Section 8.1 (Name of the product). *We would therefore propose that it be transferred to Subsection 8.1 (see comment under 8 Labelling, Section 8.1 Name of the product).*

## 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

### 3.1.1 Basic ingredients

#### "Edible fruits" and "vegetables", "seeds", "spices", "herbs" and/or "condiments"

"Edible fruits" and "vegetables", "seeds", "spices", "herbs" and/or "condiments" are mentioned as basic ingredients. This standard applies to edible fruits and vegetables, in our opinion, the ingredients "seeds", "spices", "herbs" and "condiments" are "other permitted ingredients". Furthermore, the term "seeds" is mentioned both under 3.1.1 "Basic ingredients" as well as under 3.1.3 "Other permitted ingredients".

In our opinion "seeds" should only be listed under 3.1.3 "Other permitted ingredients". We would therefore like to propose the deletion of the terms "seeds", "spices", "herbs" and "condiments" under Basic ingredients and to bring this subsection to make it consistent with the standardised language as follows:

*Fruits and vegetables and liquid packing medium when appropriate, as defined in Sections 2.1 (a), 2.1 (d) and 3.1.2, in combination with one or more of the other permitted ingredients listed in Section 3.1.3.*

#### Edible fruits

In the Codex Procedural Manual under "GENERAL PRINCIPLES OF THE CODEX ALIMENTARIUS" it is stated that "Codex standards contain requirements for food aimed at ensuring for the consumer a sound, wholesome food product free from adulteration, correctly labelled and presented." In our opinion this provisions include that foodstuffs are "edible". We would therefore like to propose the deletion of the term "edible" as follows: *edible fruits*.

### 3.1.3 Other permitted ingredients

#### 3.1.3 (a) brine

Brine, the liquid obtained from water and salt, is mentioned as another permitted ingredient. In our opinion, brine should describe the packing media whereas 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" and to add to the list in a new subsection (n) the foodstuff "salt" (CX STAN 150-1985, Rev. 1-1997 (Amd. 1-1999, Amd. 2-2001))*".

#### 3.1.3 (c) dried fruits

Fruits and vegetables are basic ingredients as mentioned in the Scope and under 3.1.1 "Basic ingredients". They are included in the term "fruits" (whether dried or fresh). We would therefore like to propose the deletion of ~~(e) dried-fruit~~.

#### 3.1.3 (d) edible aromatic plants

In the list under this section on "other permitted ingredients" the optional ingredients (d) "edible aromatic plants" are mentioned. In our opinion "aromatic plants" are "spices" and the provision that they should be edible is given by the General principles of the Codex Alimentarius. We would therefore like to propose the deletion of the term "edible" and to replace "aromatic plants" by "spices" as follows: *edible aromatic plant spices*

#### 3.1.3 (h) nuts

"Nuts" are listed under "Other permitted ingredients". Switzerland believes that "nuts" can be considered as hard-shelled fruit. Therefore, we would like to propose the deletion of "nuts" from this list as they could still be included in the term "fruit": ~~(h) nuts~~

#### 3.1.3 (m) [unrefined nutritive sweeteners]

"Unrefined nutritive sweeteners" are mentioned as optional ingredients. However, the kind of ingredients covered by this term is not clear. We would therefore propose to use the recommended term from the Codex Committee on Food Labelling: "foodstuffs with sweetening properties" followed by examples of defined foodstuffs as follows:

*foodstuffs with sweetening properties e.g. sugars (including syrups) and honey as defined in the latest edition of the Codex Standards for Sugars (CODEX STAN 212-1999 (Amd. 1-2001) and Honey (CODEX STAN 12-1981, Rev. 1 (1987), Rev. 2 (2001)) respectively.*

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

##### **4.6 Flavour enhancers**

"Natural flavourings" are listed under the title flavour enhancers. Natural flavourings are not flavour enhancers. *We would therefore propose to split this section into two sections "Flavourings" and "Flavour enhancers".*

#### **8 LABELLING**

##### **8.1 Name of product**

This subsection refers to the type of product. However, the kind of products covered by the "type" is not clear, although we might assume that the styles in combination with the basic ingredient(s) and the process as well as the packing media are meant.

In our opinion and based on the description concerning the other styles in Section 2.2.8, the text under Subsection 2.2.8 (c) should be mentioned under this labelling section. We would therefore like to propose the inclusion of the text under subsection 2.2.8 (c). 8.1 so that it would read as follows:

*Pickled products shall be labelled according to the type and in combination with the name of the major ingredient. Example - a pickle made from ginger shall be labelled "Pickled Ginger in Brine". If the product is produced in accordance with the other styles provision (Section 2.2.8), the label should contain in close proximity to the name of the product such additional words or phrases that will avoid misleading or confusing the consumer.*