

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
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Agenda Item 4(a)

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**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**

**PROPOSED DRAFT CODEX STANDARD FOR CERTAIN CANNED VEGETABLES  
including Guidelines for Packing Media for Canned Vegetables**

**(AT STEP 3)**

**Comments from Australia, Brazil, Costa Rica, Ecuador, France, Malaysia, and the United States**

**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.

**Styles (Sections 2.2.2, 2.3.2, 2.4.2, 2.5.2, 2.6.2, 2.9.2, 3.5) (& Sections 8.1.2, 8.1.3)**

- 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. Moreover, Australia considers that the labelling provision for presentation style, with an amendment (see comments under Section 8.1.2) is sufficient to ensure consumers are not misled.
- Moreover, Australia believes that the inclusion of Section 3.5 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.

**Uniformity (Sections 2.2.3, 2.4.3, 2.6.3, 2.9.3)**

- As with the sections on Styles, Australia considers that standardising uniformity could constitute a technical barrier to trade and innovation in food products. Australia therefore proposes that all sections relating to uniformity be deleted.

**2.8.2 Definition of Defects and Allowances [Sweet Corn]**

- Australia believes the pre-existing standard on Defects is preferable to the proposed draft. Australia considers that the proposed specifications for combined fragments of cob, husk and awn (silk) are more restrictive than the previous standard.

- Since it is possible for there to be many ‘strands’ of silk for the weight of a small piece of cob, Australia supports the proposal to separate silk from husks and cobs. However, Australia considers the proposed tolerance of 0.1% m/m for each of these is still more restrictive than the existing standard.
- Australia therefore suggests that the pre-existing provisions for these defects are retained, as follows:

	Whole Kernel or Whole Grain or Cut Kernel Corn Per 400g drained weight	Cream Style Corn Per 600g total contents
Pieces of Cob	1 cubic centimetre	1 cubic centimetre
Pieces of Husk	7 square centimetres	7 square centimetres
All Silk	180mm	150mm

### 3.1.3 Other Permitted Ingredients

- Australia considers that the list of permitted ingredients as it stands in the proposed draft Standard is unnecessarily restrictive and could form a technical barrier to trade and innovation in these products. Australia proposes that Section 3.1.3 should be altered to include permission for those ingredients already present in the pre-existing standards for these products.

## 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 Flavour Enhancers

- Australia allows for the maximum level of monosodium glutamate to be determined by GMP. Moreover, this additive is included in Table 3 of the GSFA and is therefore generally permitted to GMP unless otherwise specified. Australia believes that limiting the addition of monosodium glutamate to canned peas, green beans, and wax beans is unnecessarily restrictive and therefore supports the second option, that is “*Limited by GMP for use in canned vegetables*”.

### 4.2 Firming Agents

- Australia allows the use of calcium chloride and calcium gluconate to be determined by GMP. Under Table 3 of the GSFA calcium chloride and calcium gluconate are permitted to GMP. Australia believes that limiting the addition of calcium chloride and calcium gluconate to canned mature processed peas is unnecessarily restrictive and suggests removing the restriction.

### 4.5 Acidity Regulators

- JECFA has assigned a group ADI of “Not Specified” for glucono-delta-lactone, calcium gluconate, magnesium gluconate, potassium gluconate, and sodium gluconate. In consideration of the JECFA Evaluation and the GSFA permission, Australia proposes that the maximum level for glucono-delta-lactone be “Limited by GMP”.
- JECFA has also assigned a group ADI of “Not Specified” for malic acid, and its sodium, potassium and calcium salts. Both these additives are listed in Table 3 of the GSFA. In light of the JECFA evaluation and the GSFA permission, Australia believes that limiting the addition of malic acid to canned asparagus and canned baby corn is unnecessarily restrictive and suggests removing the restriction.

## 7.2 Minimum Drained Weight

### 7.1.4.4 Sweet Corn

- During the course of manufacture drained weights may fall below 66% due to natural variation. Australia therefore supports a minimum drained weight for sweet corn of 61%.

## 8. Labelling

### 8.1.2

- As stated in our comments under styles, Australia proposes that the statement under this section of the draft standard is amended to the effect that:

“The presentation style and, when the vegetables are sized, the size (or sizes when sizes are mixed) shall be declared as part of the name or in close proximity to the name of the food”.

### 8.1.3

- If the Committee agrees to delete the sections defining styles, Australia proposes that the statement under this section of the draft standard is amended to the effect that:

“For asparagus, colour shall be declared as part of the name or in close proximity to the name of the food. For white asparagus, the words “not peeled”, or similar, shall be declared if that is the case.”

## BRAZIL

### PROPOSED DRAFT CODEX STANDARD FOR CERTAIN CANNED VEGETABLES (CX/PFV 06/23/8)

Paras 1 to 20 – Brazil has no comments.

#### COMMENTS TO ANNEX I

Sections 1 to 2.2.1 – Brazil has no comments.

Section 2.2.2 – Styles (1) Whole (a) and (b) – Brazil would like to know the technical justification for the examples listed as they are not tropical cultivars. In addition Brazil also has an example of cultivar more adapted to tropical conditions (cultivar Esplanada) that should be listed to the list of examples if it remains in the Standard.

Sections 2.2.2 (2) to (11) to Section 2.6.3 – Brazil has no comments.

Section 2.6.3 Definition of Defects and Allowances – Correct to 2.6.4. ought previous Section 2.6.3 relates to Uniformity.

Additionally the least part of the table should be clarified or reflect the language of the rest of the document – mainly the format established in the previous Section 2.2.4 or 2.4.4.

Brazil suggests the format:

#### 2.6.4 Definition of Defects and Allowances

Defects	Definition	Weight Percentage with respect to the drained weight product (Brazil has no comments)
(1) Defective texture	Hard or fibrous and/or excessively soft texture, with seriously impairs product edibility.	Brazil has no comments
(2) Mineral impurities	Such as sand, gravel or other soil elements.	Brazil has no comments
(3) Damaged units	Units presenting colour defects, scars and grazes, abrasions and other imperfections of the same type which seriously impair product appearance.	Brazil has no comments
(4) Mechanical damage	Broken or split units, fragments or detached pieces, which seriously impair product appearance.	Brazil has no comments
(5) Abnormal colour	Colour considerably different from the typical colour of the product.	Brazil has no comments
(6) Physiological defects	Or “palm hearts” and “palm hearts in rounds”, units with palm tree stem apical meristems.	Brazil has no comments

The total amount of defects from (1) to (6) shall not exceed [ to be defined ] for palm hearts, palm shoots or shoots of cultivated palm, palm stem pieces and palm tips, [of the drained product weight ].

The total amount for other styles shall not exceed [ to be defined ], [of the drained product weight ].

Section 2.7 to Section 9 – Brazil has no comments.

## COMMENTS TO ANNEX II

- CODEX Secretariat Suggestion to Section 2.1 – Product Definition – Brazil agrees with the suggestion of the CODEX Secretariat.
- CODEX Secretariat Suggestion to Section 3.4 – Lot Acceptance – Brazil agrees with the suggestion of the CODEX Secretariat.
- CODEX Secretariat Suggestion to Section 3.5 – Other Styles – Brazil agrees with the suggestion of the CODEX Secretariat.
- CODEX Secretariat Suggestion to Section 4 – Food Additives/General consideration – Brazil agrees with the suggestion of the CODEX Secretariat.
- CODEX Secretariat Suggestion to Section 6 – Hygiene – Brazil has no comments.
- CODEX Secretariat Suggestion to Section 7.1.1 – Minimum Fill – Brazil has no comments.
- CODEX Secretariat Suggestion to Section 7.2 – Lot Acceptance – Brazil has no comments.
- CODEX Secretariat Suggestion to Section 9 – Methods of analysis and Sampling – Brazil has no comments.

### COSTA RICA

At the present time the Costa Rican Professionals opposition [to hearts of palm in the standard] is mainly justified by the following points:

1. There is no scientific reason to establish a differentiation between wild palms and cultivated palms such as redacted in point 2.6.1.
2. Points 2.6.1 and 2.6.2 are full of biological errors which will be developed in further documents.
3. The redaction of this draft would represent a real and not justifiable prejudice for cultivated palm producers (which represent 90% of international work market) and the owners of cultivated heart of palm brand in the world.
4. This draft redaction disregards the wild palm harm to environment denounced by all specialists including in the production countries.
5. This text project emanates from a guyano-french minority lobby bunch which aim is only to create a harm to the whole agricultural sector in the world. We think that this is not the role of Codex Alimentarius Commission to interfere in such actuation.

### ECUADOR

Belatedly we have received the Proposed Draft Codex For Certain Canned Vegetables specifically concerning Hearts of Palm, which we found that affects directly the interests of the Cultivated Hearts of Palm Exporters from Ecuador. Due to this, we strongly object this proposal referring to Hearts of Palm articles 2.6.1 until 2.6.3.

Furthermore we would like to remark that Ecuador is the world's biggest Hearts of Palm exporter, with 55% of world's SOM. Because of this, our position towards this proposal, as a country, must be taken into account for the definition of the Standards of the Codex Alimentarius of this product (see CRD 6 - available only in Spanish - for further comments on this matter).

### FRANCE

## 2. DESCRIPTION

### 2.2.Carrots:

2.2.4. The “safe” connotation should be maintained as it appears in a vast number of Codex Standards.

- The total amount of 35% m/m is too high for defects from 1 to 6 for whole carrots, baby whole carrots, halves, quarters, julienne and strips. The total of 25% m/m is also too high for defects 1, 2, and 5 applying to rounds, diced, julienne, and double size diced carrots.

2.3.2. Green Beans: The length for “cut” style should be between 20 and 50 mm to avoid any overlap with the “short cut” style.

### 2.4. Asparagus

2.4.2.1. (1) The minimal length of 7 cm for whole asparagus is adequate; it complies with the European Code of practice enforced by the Association of European Fruits and Vegetables Industries (OEITFL).

2.4.2.2. (1) In regards to white asparagus, tips may be green but only rarely will they be violet;

(2) White asparagus with green or violet tips: the 50% ratio of the length of the asparagus that can be colored is right.

(3) Green asparagus: such a color defect is extremely rare for this kind of asparagus; there should be no colored part or only a very short length of colored asparagus.

**2.4.4. Definition of Defects and Allowances:**

(4) Being of a very different nature, the “Hollow asparagus” and “Fibrous asparagus” defects should be clearly distinguished, the former being of more serious consequence. A 5% limit could be retained for hollow asparagus and 15% for fibrous asparagus.

(6) Damaged asparagus: this defect should be limited to 5% as it greatly hampers product wholesomeness.

**2.5. Green Peas:**

2.2.3. Definition of Defects and Allowances:

(1) Blemished peas: the 5% m/m limit should be retained.

(2) Pea fragments: this defect is more frequent amongst large green peas. A limit of 10% m/m is thus acceptable for medium and non-sized peas. The limit must however be set at 5% for other sizes.

Total defects should not exceed 10% m/m.

**2.6. Palms:**

2.6.2. Palm grading is not an established commercial practice. The Size Designation Table could therefore be deleted.

2.6.3. Uniformity: a length of ± 10mm is acceptable but a diameter of ± 5 mm is more than adequate.

**2.8 Sweet Corn: 2.8.2.**

The first paragraph, which raises some issues given the difficulty of measuring such a criterion, could be replaced by simply mentioning “reasonably tender” in the definition of Section 2.8.1.

(1) Distinguishing between silk and other foreign matter is relevant: 0.1% is adequate for silk and 0.1% for other foreign matter.

(4) Split grains or empty skins: the 5% limit should be retained.

## MALAYSIA

### 2. DESCRIPTION

#### 2.1 PRODUCT DEFINITIONS

Malaysia is of the view that the words “*dried beans*” and “*soaking*” should be included in the sentence because there are countries which do not produce the beans but import the dried beans to be processed into canned vegetables.

As such, the sentences will read as follows:

***“Canned vegetables are the products:***

***(1) prepared from fresh (barring mature processed peas), frozen, or dried beans and sound vegetables, as defined in Section 2.2, having..... They undergo operations such as washing, peeling, grading, cutting, soaking, etc., depending on the type of product.”***

#### 2.2.4 Defects and Allowances

**Whole Carrots and Whole Young Carrots, Carrots in Halves, in Quarters, Strips, Finger Cuts.**

Malaysia would like to replace the total amount of defects “35%” in paragraph 1 with “15%” as we are of the view that the level suggested is too high. Malaysia also proposes to remove the square brackets for “15%”. The sentence should read as:

***“The total amount of defects from (1) to (6) shall not exceed 15% of the drained product weight”.***

In line with that, Malaysia proposes to replace the percentage figure “20%” with “15%” in the columns for “Tolerances as a percentage of the drained product weight” as we are of the view that the level suggested is too high and should not exceed the level of total amount of defects i.e. 15%.

The paragraph should read as:

Defects	Definition	Tolerances as a percentage of the drained product weight
(1) Blemished carrot	Blemished or faded zones with a diameter above 5 mm.	<del>20</del> 15
(2) Mechanical damage	Carrots that are crushed or grazed during canning	10
(3) Malformations	Deformations or fissures that appeared during growth	<del>20</del> 15
(4) Unpeeled parts	30% or more of the surface is unpeeled	<del>20</del> 15
(5) Fibrous	Carrots that are hard or woody owing to their fibrousness	10
(6) Black or dark green collar	Collar with a ring that is one millimeter thick over more than half its circumference	<del>20</del> 15
(7) Foreign vegetal matter	Vegetal substance from the carrot or any other [innocuous] vegetal matter	1 piece per 1000g of total content in the container

### 2.3 GREEN BEANS OR WAX BEANS

#### 2.3.2 Styles

Malaysia proposes to delete the words “*[no less than 20 mm] [at most 50 mm and at least 10 mm]*” in paragraph 2. Malaysia also proposes to remove the square brackets for *[approximately uniform pieces of 20mm]* and adopt the text.

The sentence should read as:

**“(2) Cut/broken: pieces cut widthways with respect to the longitudinal axis; approximately uniform pieces of 20 mm.”**

Malaysia proposes to delete the following rows in the Table as follows:

Grading Requirements for Beans (French Beans or Wax Beans)

Categories	Grading Criteria (mm)	Maximum percentage (m/m of non conforming beans)
(1) Extra small	6.5	<del>[10%]</del> [8%]
(2) Very small	8.0	<del>[10%]</del> [8%]
(3) Small	9.0	<del>[10%]</del> [8%]
(4) Medium	10.5	<del>[10%]</del> [8%]
(5) Large	Out of grade	
(6) Not screened	Not screened (*)	Natural breakdown of the size beans (*)

#### 2.3.4 Defects and Allowances

Malaysia proposes to delete the following rows in the Table as follows:

##### Proposal 1

Category	Stringy pods	Pods without ends removed	Defective pods	Bean pieces	Harmless plant material	Aggregate defects
(1) Extra small French beans	2	3	3	3	1	<del>[8]</del> [4]
(2) Very small French beans	3	3	3	3	3	<del>[10]</del> [6]
(3) Small French beans	3	3	3	3	3	<del>[10]</del> [8]
(4) Small wax beans	3	3	3	3	3	<del>[10]</del> [8]
(5) Medium French beans	3	3	4	4	4	<del>[15]</del> [10]
(6) Medium wax beans	3	3	4	4	4	<del>[15]</del> [10]
(7) Green Beans	3	3	5	5	5	20
(8) Wax beans	3	3	5	5	5	20

## 2.4 ASPARAGUS

### 2.4.2 Styles

#### 2.4.2.1 Asparagus comes in the following shapes and sizes:

Malaysia proposes to delete the words “[Long shoots or long spears]” and replace with the words “Asparagus or whole asparagus or whole spears”.

The paragraph is to read:

**“(1) Asparagus or whole asparagus or whole spears: tip and adjoining part of the spear measuring at most 18 cm and at least 12 cm in length.”**

(1) Malaysia proposes to delete the words “[Shoots or spears]”. Malaysia also proposes to remove the square brackets for “[short asparagus]” and “[whole short spears]”. Paragraph (2) should read as follows:

**“(2) Short asparagus or whole short spears: tip and adjoining part of the spear measuring at most 12 cm and at least 7 cm in length.”**

#### 2.4.2.2 Asparagus are canned as follows in terms of their colour:

(2) Malaysia feels that word “[50%]” should be deleted in this paragraph and remove the square brackets for “[20%]”. The sentence should read as follows:

**“(2) White asparagus with violet or green tips: white, cream or yellowish white asparagus may have violet, green, light green or yellowish green tips, and these colours may also apply to the adjoining region, but no more than 25% in number of the units may present these colours over more than 20% of their length.”**

### 2.4.4 Definition of Defects and Allowance

Malaysia proposes to delete the following rows in the Table as follows:

Defect	Definition	Maximum
(4)Hollow asparagus	Hollow units to the extent that they seriously impair the product aspect and fibrous, tough asparagus.	[10% or 5% in number] for the defect (4) <del>or [15% in number for hollow asparagus and 10% for fibrous asparagus]</del>
(6)Damaged asparagus	ur defect, a mechanical lesion, a disease, or damaged by any other means to the extent that the aspect or the edibility of the product is seriously impaired.	<del>[10%]</del> [15%] in number

## 2.5 GREEN PEAS

### 2.5.2 Definition of Defects and Allowances

Malaysia proposes to delete the following rows in the Table as follows:

Defects	Definition	Maximum Limits (based on the weight of drained peas)
(1) Blemish peas	Consisting of peas which are slightly stained or spotted	<del>[5% m/m]</del> [3% m/m]
(2) Seriously blemished peas	Consisting of peas which are spotted, discoloured or otherwise blemished (including worm-eaten peas) to the extent that the appearance or eating quality is seriously affected.	1% m/m
(3) Pea fragments	Consisting of portions of peas; separated or individual cotyledon; crushed, partial, or broken cotyledons; and loose skins; but not including entire intact peas with skins detached.	<del>[10% m/m]</del> [5% m/m]
(4) Yellow peas	Entire pea is substantially yellow and is not a so-called ‘blond’ pea which is very pale in colour.	2% m/m
(5) Extraneous plant material	Consisting of any vine or leaf or pod material from the pea plant, or other harmless plant material not purposely added as an ingredient.	0.5% m/m
Total of the foregoing defects (1), (2), (3), (4), (5)		<del>[12% m/m]</del> [10% m/m]

## 2.6 PALM

### 2.6.1 Product Description

Malaysia proposes the inclusion of other species of cultivated palm, i.e. **coconut (*Cocos nucifera L.*) and oil palm (*Elaeis guineensis Jacq*)** in paragraph 2.6.1 after *Bactris gasipaes*, as these species are fit for human consumption.

### 2.6.2 Styles

Malaysia proposes to delete the words “[*at the median part*]” in the sentence. We also propose to remove the square brackets for “[*the thickest part*]” and adopt the text. The sentence should read as follows:

**“Thickness is measured at [*the thickest part*] of the unit perpendicularly to the longitudinal axis.”**

## 2.7 MATURE PROCESSED PEAS

### 2.7.1 Product Definition

Malaysia proposes the inclusion of other species of dried grains i.e. **“*Phaseolus vulgaris L., Phaseolus coccineas L., Phaseolus multiflorus LMK*”** after the words “*Pisum sativum L.*”

### 2.7.2 Definition of Defects and Allowances

Malaysia proposes **15%** for the total of the defects (1), (2), (3) and (4). Hence, the square brackets for “[**15%**]” should be removed and the text be adopted. The new paragraph should read as follows:

**“The total of the defects (1), (2), (3) and (4) should not exceed 15% by weight.”**

## 2.9 BABY CORN OR YOUNG CORN

### 2.9.4.2 Cut Baby Corn

Paragraph (5)

Malaysia proposes to remove the square brackets and adopt the text “[**15%**]” of the “TOTAL DEFECTS without (4)”.

## 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

### 3.1 COMPOSITION

#### 3.1.3 Other Permitted Ingredients

Malaysia proposes to:

- i) remove the square brackets for [*Oil*] in paragraph (4) and adopt the text.
- ii) include **“edible oil or fat, natural and modified starches and cheese”** as optional ingredients since these are currently in use.

## 6. HYGIENE

### Paragraph 6.3 – 6.5

Malaysia is of the view that the square brackets should be removed and the texts be adopted.

#### Paragraph 6.5

Malaysia notices typographical error in the sentence. The words “*Clostridium Botulinum*” should be in italics. The sentence should read as:

**“6.5 Canned vegetables have to undergo a heat treatment in order to destroy *Clostridium botulinum* spores.”**

## UNITED STATES

The United States of America supports the efforts and activities of the Codex Committee on Processed Fruits and Vegetables (CCPFV) in developing standards to facilitate international trade. The U.S. wishes to remind the CCPFV that the standards being developed must not be biased towards a particular country or regional practices rather they should reflect international trade practices. Hence, the CCPFV should always be guided by Statutes of the Codex Alimentarius Commission and paying close attention to Article I (a) “*protecting the health of the consumers and ensuring fair practices in the food trade*”.

One of the goals of reconvening the CCPFV was to revise and simplify the existing processed fruits and vegetables standards. A comparison between the existing codex standards and those currently being revised by the CCPFV indicate that the resultant is more complicated- contrary to the mandate given and the original intent. The inability of the standardization experts participating in the CCPFV standardization process to advance the development of the proposed Codex standards for Jams Jellies and Marmalade and for Certain Canned Vegetables is a clear indication of the complicity and complexity of the standards.

The United States of America is concerned that for the past six years, several Working Group sessions ( both electronic and physical), and the last three CCPFV Sessions, the Proposed Draft Codex Standard For Certain Canned Vegetables has not advanced beyond Step 2. Apparently, combining the seven individual canned vegetable standards has been more difficult than imagined.

Codex standards should be user friendly and reflect industry/trade practices. This proposed combined standard in its current form is neither. Combining the seven standards into one appears to be an academic exercise, generating a document for regulators and not for industry. It is important to note that processors of fruits and vegetables and their regulatory agencies keep all the requirements of each commodity in a continuous/sequential document, similar to the current individual standards for each commodity, whereas, the Proposed Codex Standard does not. For example the Product Definition for carrots (Section 2.2.1) ends on page 5, while Quality Criteria (Section 3.2.) is nine pages away on page 14.

The U.S. recommends that CCPFV discontinue combining the seven canned vegetable standards, and revert to the individual standards format using the revised text where appropriate. After the individual revision of each standard, the individual standards should be compiled into some form/order and then entitled "Codex Standards for Certain Canned Vegetables".

The U.S. encourages the CCPFV to act on the above mentioned recommendation. In addition, the U.S. submits the following specific relevant comments to the revised text, for use as appropriate in individual standards.

## **Section 2. Description.**

**Section 2.1(1)** refers to canned vegetables included in the draft standard as those "defined in Section 2.2." Section 2.2, however, addresses only carrots. The U.S. suggests that the phrase "defined in Section 2.2" be revised to "defined in Sections 2.2-2.9."

**Section 2.5.2(3)** (Definitions of Defects and Allowances) addresses a Maximum Limit for pea fragments in canned peas. The U.S. notes that a maximum of 10% pea fragments in canned peas this is a well established industry practice, it is consistent with U.S. standards for peas and therefore, supports the Maximum Limit of 10% for pea fragments in canned peas.

**Section 2.5.2** The last provision at the bottom of the table (Definition of Defects and Allowances) addresses the Maximum Limit for total defects found in items (1), (2), (3), (4) and (5). The U.S. notes that U.S. standards permit a maximum of 12% total defects in canned peas and, therefore, supports a total Maximum Limit of 12% for total defects in canned peas.

## **Section 3 Essential Composition**

**Section 3.1.3(4)** permits the addition of oil to canned carrots, canned green beans or wax beans, canned asparagus, canned green peas, canned palm, canned peas, canned sweet corn, canned baby corn or young corn. The U.S. notes that its standards and industry practices allow the addition of oil to only canned peas, canned artichokes and canned pimientos. The U.S. suggests careful review of this provision to ensure that the addition of oil is permitted only as necessary. In addition, U.S. standards require that added oil be declared along with the name of the food. It is unclear if Section 8.1.7 addresses added oil.

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

**Section 3.1.3 (5)** permits the addition of native starch for cream corn. The U.S. supports the use of starch (or modified starch) in cream-style canned corn.

**Section 3.1.3(6)** permits the addition of tomato paste in canned vegetables. However, the purpose for providing tomato paste as an optional ingredient is not clear. If tomato paste is determined necessary in certain vegetables, the U.S. suggests the provision be qualified appropriately

*"Flavor enhancers, modified starches, firming agents, colors, color retention agents and acidity regulators used in accordance with Table 1 and 2 of the Codex General Standard for Food Additives (GSFA) in food category 04.2.2.4 (Canned or bottled (pasteurized) or retort pouch vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), and seaweed, or listed in Table 3 of the GSFA are acceptable for use in foods conforming to this standard."*

## **Section 4 Food Additives**

The tables contained in Section 4 (Food Additives) lists flavor enhancers, firming agents, colors, color retention agents and acidity regulators. The U.S. suggests that the following general statement to replace the current tables found in Section 4:

**Section 7 Weights and Measures**

**Section 7.1.4.4** states that the minimum drain weight for sweet corn with liquid packing medium is 66% (61% in brackets). The U.S. notes 61% is the widely accepted industry requirement and is part of its national standards and therefore supports the provision that the minimum drain weight for sweet corn with liquid packing medium of 61%.

**Section 8 Labelling**

**Section 8.1.7** states "If an added ingredient alters the flavor characteristics of the product, the name of said ingredient should be affixed to the commercial designation of the product or in close proximity." The U.S. believes this statement is unclear (e.g., are added oils encompassed under this provision?). The U.S. suggests revising Section 8.1.7 to require declaration of any characterizing spices, seasonings, and garnishes (including oil) to accompany the name of the of the food.