

# codex alimentarius commission



FOOD AND AGRICULTURE  
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Agenda Item 3(b)

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

23<sup>rd</sup> Session

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# E

### DRAFT CODEX STANDARD FOR PROCESSED TOMATO CONCENTRATES

(AT STEP 6)

Comments from Australia, Brazil, Cuba, European Community, Malaysia, Panama, Thailand,  
United States, Uruguay, Venezuela, and the World Processing Tomato Council

#### AUSTRALIA

#### General Considerations

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

#### SPECIFIC CONSIDERATIONS

##### 2.1 Product Definition

The draft defines this product as excluding the majority of skins and seeds. Australia believes that this definition will restrict innovation and product development. For example, Australian manufacturers produce “home-style” / coarse textured products that contain skin and seed as an essential component.

Australia suggests a footnote be added to 2.1 to the effect that *‘The presence of seed or skin is permissible for products specifically manufactured and declared as coarse textured products or similar.’*

Some Australian tomato purees are manufactured to a minimum tomato soluble solid content of 6%. Australia therefore requests that the minimum level is set at 6%.

##### 2.2 Product Designation (& 8.1 Name of the Product)

The Australia and New Zealand Food Standards Code does not define tomato puree and tomato paste and Australia does not consider that it is necessary to specify designations for these two products. There are a range of other designations for such products on the international market. Australia believes that designations should be driven by the market. Defining designations within the standard is overly prescriptive and could impede product innovation.

Moreover, the soluble solids level differentiating between puree and paste, proposed as 24% in the draft standard, may constitute a technical barrier to trade for Australian tomato producers, who manufacture tomato pastes to an average natural tomato soluble solids range of 20% to 24%. This is driven by market demand, consumer preference, as well as manufacturing efficiencies and packaging specifications (tubed products). For these reasons, Australia believes that Section 2.2 should be removed from the draft standard.

In the event that the Committee decides to retain the product designations for Tomato Puree and Tomato Paste, Australia has the following specific comments on these clauses of the draft standard:

**2.2.1 “Tomato Puree”:** Australian manufacturers of concentrated tomato products work to a soluble solids range of 6% to 20% for tomato puree products. Australia therefore suggests that the soluble solid level of “Tomato Purees” should be *“no less than 6%, but less than 20%”*.

**2.2.2 “Tomato Paste”:** Australian manufacturers of concentrated tomato products work to an average soluble solids range of 20% to 24% for tomato paste products. Australia therefore believes the minimum soluble solid level of “Tomato Pastes” should be *“no less than 20%”*.

### 3.1.2 Optional Ingredients

Sugar is not listed as an optional ingredient. Australia believes that nutritive carbohydrate sweeteners should be included in the list of permitted optional ingredients. Australian producers add sugar to one particular style of tomato concentrate to meet specific market requirements.

Australia therefore suggests the addition of *“Sugars as defined in the Codex Standard for Sugars”* to the list of optional ingredients.

Australia recognises that the addition of sugar as an optional ingredient increases the soluble solids level in the product and thus causes an issue in calculating natural tomato soluble solids. Australia therefore proposes that footnote 2, appearing under Section 2.1 is modified to the effect that:

*“The concentrations are measured on the product without added salt **and/or sugar.**”*

### 3.2.1 Definition of Defects

Australia would like to highlight a typing error in the first paragraph of this section. It should read:

*“...under such practices that the product is substantially free of extraneous plant materials, ~~this~~ including other objectionable material and ...”*

**3.2.1 (a) and (b):** These provisions do not provide for the intentional presence of seed or peel in coarse tomato puree type products (see comments under Section 2.1). Australia believes that these clauses of Section 3.2.1 should not apply to coarse textured products. Australia suggests a footnote be added to Section 3.2.1 to the effect that:

*“The presence of seed or skin is permissible for products specifically manufactured and declared as coarse textured products.”*

### 3.2.2 Defects and Allowances

Australia considers that the reference to footnote 3 in this clause is incorrectly positioned and should be moved to Section 3.2.2.1 Mineral Impurities. Australia would also like to highlight a typing error in the footnote. It should read: *“Sand, soil and any other impurities insoluble in ~~hidrocloric~~ **hydrochloric acid.**”*

#### 3.2.2.3 Mould Count

Australia supports the words in brackets for this section.

#### 3.2.2.4 pH

Australia supports the words in brackets for this section.

### 3.2.3 Classification of “Defectives”

If the product designations for tomato puree and tomato paste are removed from the draft standard (see comments under Section 2.2), a specific reference to soluble solids requirements would not be necessary in this clause. In addition, Australia notes that this clause has not been updated to reflect the current numbering within the draft standard. Australia therefore suggests that this paragraph be amended to the effect:

*“A container that fails to meet the ~~natural tomato soluble solids~~ requirements, as set out in Sections 2.1.2 – 2.1.4 Section 2.1, and/or one or more of the applicable quality requirements, as set out in Sections 3.2.1 through 3.2.5 Section 3.2, or fails to meet product designations as established in national legislation, should be considered a “defective”.*

### 3.2.4 Lot Acceptance

Australia notes that both clauses of this section have not been updated to reflect the current numbering within the draft standard. They should read:

- (a) *“the number of “defectives”, as defined in Section ~~3.2.7~~ 3.2.3 does not exceed...”*  
 (b) *“maximum allowance for mould count is not exceeded (see Section ~~3.2.6~~ 3.2.2.3).”*

## 4. Food Additives

Australia considers that Section 4 should incorporate a general statement applying to those food additives permitted for use in accordance with GMP (Table III of General Standard for Food Additives (GSFA)), and that only food additives with numerical maximum levels are listed under the appropriate category in both the commodity standard and GSFA.

As such, a note to the following effect should form a preamble to this section:

*“The products covered by the provisions of this Standard shall comply with those maximum levels for food additives as provided for in Tables 1-3 of the General Standard for Food Additives.”*

### 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.

If no specific provisions for acidity regulators are incorporated into this standard this subsection could be deleted as it would be covered by the specific reference to the GSFA under a generic additives provision (see comments under Section 4).

### 7.1.1 Minimum Fill

Australia sees no necessity for this clause provided a product meets the declared net weight conditions as outlined in the *Codex General Standard for the Labelling of Prepackaged Food* (sub-clause 4.3).

## 8.1 Name of the Product

See comments made above under Section 2.2 Product Designation. Following on from these comments, should the Committee agree to remove the product designations for puree and paste, currently stipulated under Section 2.2 of the draft standard, Australia suggests that Section 8.1 is also amended to the effect:

### *Name of the Product*

*The name of the product shall be:*

*~~“Tomato Puree” if the food contains not less than [7%] but less than [24%] natural tomato soluble solids;~~*

*~~“Tomato Paste” if the food contains not less than [24%] natural tomato soluble solids; or~~*

*~~another~~ any denomination usually employed in the country. **The name of the product may be accompanied by the declaration of the percentage of the natural tomato soluble solids.***

In the event that the Committee decides to maintain product designations for Tomato Puree and Tomato Paste, Australia has the following comments:

Australia considers that the range of tomato soluble solids suggested for products named “Tomato Puree” (not less than [7%] but less than [24%]) is very broad and may mislead consumers. Two purees containing solids levels at either end of this range would be so different that their performance in any home use would be vastly dissimilar, thus causing confusion for consumers purchasing these products.

Australia requests the Committee to give some consideration to whether products designated as “tomato puree”, according to the definition under Section 2.2, should be further separated into two categories for labelling purposes. Australia believes that establishing two name categories for these products will provide greater clarity for consumers.

One way to address this issue would be to use clause 8.1.2 (b) of the existing Processed Tomato Concentrates Standard (CODEX STAN 57-1981) as a basis for an additional statement under clause 8.1 (a) of the draft standard. Australia therefore suggests that this clause is amended to the effect:

“(a) *“Tomato Puree” if the food contains not less than ~~{7%}~~ 6% but less than ~~{24%}~~18% natural tomato soluble solids and “Concentrated Tomato Puree” if the food contains not less than 18% but less than 20% natural tomato solids;*”

However, this approach would further complicate this issue and therefore Australia’s preference is for any reference to product designations to be removed from the draft standard.

## 8.2 Declaration of the Percentage of Natural Tomato Soluble Solids

Australia considers that the wording of this section in the draft standard may be confusing as it could be inferred that the soluble solids should be declared on all products. Australia therefore suggests that the first sentence of this section is amended to:

*“Where a declaration of the percentage solids is made, it may be included on the label in either of the following manners:...”*

### BRAZIL

Items 2.1., 2.2.1. e 2.2.2.: The Brazilian legislation establishes 6%, in accordance to WPTC, however there is no objection to the level of 7%.

Item 3.1.2.: Although the inclusion of “Sugars” had not been accepted in 22<sup>nd</sup> Session of CCPFV, Brazil maintains the position favorable to the inclusion of “sugars” as other permitted ingredients, as allowed under Brazilian legislation for tomato concentrates.

Item 3.2.2.3.: Considering that there are countries that do not have specification of mould count in their legislation, Brazil suggests that the product shall be considered nonconforming if the mould counts of all of the sub samples are more than 70% .

\* AOAC method presents strong variation in different laboratories. Values do not represent any health and safety factor.

Item 3.2.2.4.: Brazil agrees.

Item 4.1.: Any acidity regulator that is listed in table 3 of the Codex General Standard for Food Additives may be used according to Good Manufacturing Practices (GMP).

Item 8.1. a e b: Brazil agrees.

### CUBA

2.1 We propose a concentration of natural tomato soluble solids equal to or higher than 8 %.

2.2 We propose including the designation:

“**Concentrated Tomato Puree**”: is the tomato concentrate that contains at least 20 %, but not more than 24 of natural tomato soluble solids.

3.2.1 d) Another term should be sought that would better explain “scale-like”.

3.2.2 **Defects and Tolerances** We propose removing points 3.2.2.1 and 3.2.2.2.

3.2.2.3 We approve the content, but we suggest the following text: “...in conformance with legislation in the countries”. This Standard will not govern only importing countries, but countries that are only exporters or producers as well, that is, it will govern international trade.

3.2.2.4 We propose a pH less than or equal to 4.3.

3.2.3 Sections 2.1.2 to 2.1.4 do not appear in the Draft, but rather 2.1 to 2.2.

3.2.4 (a) Section 3.2.7 does not appear in the Draft; it would be 3.2.2.

(b) Section 3.2.6 does not appear in the Draft; it would be 3.2.2.3.

If these criteria of acceptance are not applied to containers destined for wholesale, the Standard should define what criteria should be applied, or that each country should determine what sampling plan to follow. The parties can contractually agree on a sampling plan. We propose removing the definition for inspection level and just maintaining an ANC of 6.5.

8.1 (c) We propose removing this point.

9 **Methods of Analysis** – Keep ISO 2173 in mind as the method for determining the content of soluble solids.

## EUROPEAN COMMUNITY

### 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

#### 3.2 Quality Criteria:

As for other standards on products with optional ingredients, the sentence should be completed as followed:

Processed tomato concentrates shall have good flavor and odor, fairly good red color, and shall possess a homogeneous (evenly divided) texture, characteristic of the product *and processed tomato concentrates with special ingredients shall have a flavor characteristic of that imparted by the tomato and the other substances used.*

#### 3.2.2.3. Mould Count

The presence of an important mould rate in the tomato concentrate testifies a use of raw materials of bad quality. The current project refers to national legislations, because this rate can be variable following countries according to climatology, and does not fix maximum mould rates. It would be desirable, in the absence of an agreement on a common value, to fix a maximum that national legislations could not exceed, or which could apply in the absence of national legislation, and to stress the consequences of the use of defective raw materials. At European level this rate is 70% of positive fields (Howard's method) after dilution of the concentrate until obtaining a rate of dry matter of 8 %.

EC proposes the following wording for this section 3.2.2.3:

*Mould count for processed tomato concentrates to be set according to the national legislations of the importing countries, without exceeding 70% of positive fields (Howard's method).*

#### 4.1. Acidity Regulators

The European Community does not support the use of 380 ammonium citrates in this food category.

## MALAYSIA

### 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

Malaysia proposes to remove the square brackets and adopt the texts contained therein:

i) ~~{3.2.2.3 Mould Count: Mould count for processed tomato concentrates to be set according to the national legislation of importing countries.}~~

ii) ~~{3.2.2.4 Ph: The Ph must be below 4.6}~~.

#### 3.2.3 Classification of “Defective”

Malaysia noticed a typographical error in the paragraph. We propose to delete the :

i) word ~~‘2.1—2.1.4’~~ and replace with the word ~~‘2.1-2.2.2’~~.

ii) word ~~‘3.2.1’~~ and replace with the word ~~‘3.2’~~.

iii) word ~~‘3.2.5’~~ and replace with the word ~~‘3.2.2.4’~~

The sentence should read as follows: *‘A container that fails to meet the natural tomato soluble solids requirements, as set out in Sections 2.1 – 2.2.2, and/or one or more of the applicable quality requirements, as set out in Sections 3.2 through 3.2.2.4 should be considered a “defective”.*

#### 3.2.4 Lot Acceptance

Malaysia noticed a typographical error in the paragraph. We propose to delete the:

(a) word ~~‘3.2.7’~~ and replace with the word ~~‘3.2.3’~~.

(b) word ~~‘(see Section 3.2.6)’~~ and replace with the word ~~‘(see Section 3.2.2.3)’~~.

The paragraph should read as follows: *‘In accordance with the Codex General Guidelines on Sampling (CAC/GL 50-2004), a lot should be considered as meeting the applicable quality requirements referred to in Section 3.2 when:*

(a) *the number of ‘defectives’, as defined in Section 3.2.3 does not exceed the acceptance number (c) of the appropriate sampling plan with a AQL of 6.5 (see Annex); and*

(b) *maximum allowance for mould count is not exceeded (see Section 3.2.2.3)’.*

**8.1 NAME OF THE PRODUCT:** Malaysia proposes to include new section in the paragraph: *‘(d) If an added ingredient, as defined in Section 3.1.3, gives characteristics flavour to the product, the name of this ingredient “with X” must be stated on the label as to be easily discernible by the consumer.’*

## PANAMA

In general terms, we support at great length both the general and technical content of the three drafts Codex standards for processed tomato concentrates, preserved tomatoes and certain canned citrus fruits.

### SPECIFIC COMMENTS

1. The instructions given in item 3.2.3, Classification of “Defectives”, are confusing because a reference is made to nonexistent sections in this document (i.e., 2.12 - 2.14, and 3.2.5.) Most likely, these sections belong to a different document whose reference was omitted by mistake and should be included.
2. [In the Spanish version of the document,] it would be advisable that each time that a reference is made to the Good Manufacturing Practices or GMP [BPF, in Spanish] the equivalent abbreviation of BPM be written too (Buenas Prácticas de Fabricación, “BPF” ↔ Buenas Prácticas de Manufactura, “BPM”.) For example, see the following:
  - First line, item 3.2.1
  - Last column (Maximum Level) of table 4.1 (Acidity Regulators)

## THAILAND

### 3.1.1 Basic Ingredients

“Processed tomato concentrate” should be replaced with “tomato”.

### 3.1.2 Optional Ingredients

We note that the scope of this proposed draft standard does not cover highly seasoned products. Therefore, some optional ingredients listed in this section, such as spices and aromatic plants etc, need to be reviewed.

### 3.2.2.3 Mould Count

We prefer the previous text that clearly identify specification of mould count. The text

”The product shall be considered nonconforming if the average mould counts in 6 samples is more than 70%” should be re-inserted.

## 6.0 Hygiene

We suggest inclusion of the following footnote to Section 6.2 as recommended by the 37<sup>th</sup> CCFH.

“For products that are rendered commercially sterile in accordance with the Recommended Code of Hygienic Practice for Low-Acid and Acidified Low - Acid Canned Foods, microbiological criteria are not recommended as they do not offer benefit in providing the consumer with a food that is safe and suitable for consumption

## UNITED STATES

### Section 3.2.2.3 Mould Count

The U.S. supports retention of the bracketed text in the standard based on some of the reasons cited in ALINORM 05/28/ 27 pg.5 paragraph 34. The U.S. believes the existing draft text correctly reflects international trading practices. i.e. exporters and importers deferring to the food safety legislation of individual importing countries.

### Section 3.2.2.4 pH

Section 3.2.2.4 states that the pH of processed tomato concentrates must be below 4.6. Therefore, the U.S. informs the CCFV that the U.S standards for processed tomato concentrates specify a pH of 4.2 +/- 0.2.

### Section 4.1 Acidity Regulators

The table contained in Section 4.1 lists acidity regulators for processed tomato concentrate. The U.S. suggests that the following statement replace the current table found in Section 4.1:

*“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 seaweeds) for tomato paste, and in food category 4.2.2.5 (Vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed, and nut and seed purees and spreads for tomato purees, or listed in Table 3 of the GSFA are acceptable for use in foods conforming to this standard.”*

**URUGUAY**

In terms of the text of the draft, we propose the specific recommendations that appear below:

**2 DESCRIPTION**

2.1 We suggest adding the definition of natural tomato soluble solids to this point.

2.2.1 and 2.2.2 Uruguay agrees with the proposed values that appear in the square brackets, keeping in mind the definition of tomato soluble solids.

**3 ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.2.2. Defects and Tolerances**

3.2.2.3 and 3.2.2.4 Uruguay agrees with what is proposed in the square brackets.

3.2.3 Uruguay suggests that in the Spanish version, the word “envases” [“containers”] be changed to “producto” [“product”]

We note some errors in numbering in this point:

Where it says:	2.1.2	It should say:	2.2.1
	2.1.4		2.2.2
	3.2.5		3.2.3

**3.2.4 Lot Acceptance**

Where it says 3.2.7 it should say 3.2.3

In this point, Uruguay suggests removing the phrase: “These criteria (..)” given that these lot acceptance criteria should apply to all products detailed in the definition of the Standard.

**8. LABELING**

8.2 Uruguay suggests that the natural soluble solids statement should be obligatory (or mandatory).

8.3 In the text in this point, we suggest changing: “..... *deberán* [“should/shall”] appear on the container .....” to “... *debieran* [“should”] appear on the container ....”

**VENEZUELA****2. DESCRIPTION****2.2. PRODUCT DESIGNATION**

*Tomato concentrate may be considered as:*

2.2.1. “Tomato paste” Tomato concentrate that contains at least 24% (**25 %**) of natural tomato soluble solids.

*In Venezuela, tomato paste is classified depending on the content of natural tomato soluble solids, less salt, as:*

**2.2.1.1. Simple Tomato Paste: minimum of 25 % natural tomato soluble solids**

**2.2.1.2. Double Concentrated Tomato Paste: minimum of 28 % natural tomato soluble solids.**

2.2.1.3. Triple Concentrated Tomato Paste: minimum of 33 % natural tomato soluble solids.

2.2.1.4. Extra Tomato Paste: minimum of 39 % natural tomato soluble solids.

**3. ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.1 COMPOSITION****3.1.2 OPTIONAL INGREDIENTS**

(a) Salt (sodium chloride),

(b) Spices and aromatic plants (such as basil leaf, etc.) and their natural extracts;

(c) Lemon juice (single strength or concentrated) used as an acidulant. **Any acidity regulator listed in table 3 of the Codex General Standard for Food Additives or listed in the 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 seaweeds) in tables 1 and 2 of the GSFA.**

(d) Water

*In Venezuela, the addition of sugars, sweeteners, coloring agents, thickeners, preservatives and stabilizers is not permitted.*

## 3.2 QUALITY CRITERIA

### 3.2.1. DEFINITION OF DEFECTS

Processed tomato concentrate shall be prepared in conformance with GMP, with such materials and under such practices that the product is **FREE from mineral impurities, extraneous plant material, and other objectionable material.**

Depending on the intended use, these conditions are fulfilled when:

- (a) The product is **FREE of tomato peel, seeds and seed particles, other than those used as seasoning.**
- (b) The product is **FREE** of dark specks or scale-like particles.

### 3.2.2. DEFECTS AND TOLERANCES

#### 3.2.2.1 MINERAL IMPURITIES

**ELIMINATE. IN VENEZUELA THE PRESENCE OF THESE IMPURITIES IS NOT PERMITTED.**

#### 3.2.2.2. LACTIC ACID

**IN VENEZUELA, ACIDITY IS EXPRESSED AS ANHYDROUS CITRIC ACID, AND ITS MAXIMUM ALLOWED VALUES ARE:**

**Simple Tomato Paste: 1.85 %**

**Double Concentrated Tomato Paste: 2.10%**

**Triple Concentrated Tomato Paste: 2.50%**

**Extra Tomato Paste: 2.50%**

#### 3.2.2.3 . MOLD COUNT

**The product shall be considered nonconforming if the average mold count in 6 samples is higher than 70%. Mold hyphas: maximum of 40% of positive fields and comply with commercial sterility requirements.**

#### 3.2.2.4 pH

The pH should be less than 4.6.

### 3.2.3 CLASSIFICATION OF DEFECTIVE PRODUCTS

**PRODUCTS** that do not meet the requirements for natural tomato soluble solids established in Sections **2.2.1-2.2.2.** and/or one or more of the quality requirements established in Sections **3.2.1-3.2.3** shall be considered defective.

### 3.2.4 LOT ACCEPTANCE

- (a) The number of defective containers, as defined in Section **3.2.3**,.....
- (b) Mold count does not exceed the maximum allowed tolerance (See Section **3.2.2.3**)

## 4. FOOD ADDITIVES

### 4.1 ACIDITY REGULATORS

*Any acidity regulator listed in table 3 of the Codex General Standard for Food Additives or listed in the 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 seaweeds) in tables 1 and 2 of the GSFA. ALL OF THESE INGREDIENTS USED IN THE MINIMUM QUANTITIES NECESSARY TO MAINTAIN A PH NO HIGHER THAN 4.2.*

## 5. CONTAMINANTS

Venezuela recommends a clarification of what is referred to in points 5.1.2 and 5.2.2 in terms of the maximum levels should comply with the total content of natural tomato soluble solids....., since the maximum residue levels (MRL) are established based on regional diets and the application of good agricultural practices.

### 5.2 OTHER CONTAMINANTS

5.2.1 **The products governed** by the provisions of this standard shall comply with those maximum levels for contaminants established by the Codex Alimentarius Commission for these products.

In Venezuela, the following contaminants are permitted for the classifications described in point 2.2:

CONTAMINANT	LIMIT (MAX) (mg/kg)
COPPER	5.0
LEAD	1.0
ARSENIC	0.2
TIN	125.0
ZINC	5.0
MERCURY	0.05

## 8. LABELING

### 8.1. PRODUCT NAME

The name of the product shall be:

(a) "Tomato paste" if the food contains not less than 24% (**25%**) of natural tomato soluble solids, specifying whether it is:

**Simple Tomato Paste: minimum of 25 % natural tomato soluble solids.**

**Double Concentrated Tomato Paste: minimum of 28 % natural tomato soluble solids.**

**Triple Concentrated Tomato Paste: minimum of 33 % natural tomato soluble solids.**

**Extra Tomato Paste: minimum of 39 % natural tomato soluble solids.**

### 8.2. LABELING OF *WHOLESALE* CONTAINERS

## 9. METHODS OF ANALYSIS AND SAMPLING

PROVISION	LEVEL	METHOD	PRINCIPLE	COMMENTS
citric acid	simple: 1.85% double: 2.10% triple: 2.50% extra: 2.50%	acidity determination	acid-based titration	in Venezuela the acidity content in this type of product is expressed as a percentage of anhydrous citric acid.
mineral impurities	free			in Venezuela, presence is not permitted
mold count	hyphas of mold max. 40% of positive fields	determination of hyphas of mold. Howard method		
Ph	not greater than 4.2	determination of pH (ionic acidity)	Potentiometry	
natural tomato soluble solids (less salt) expressed in Brix	simple: min. 25 double: min. 28 triple: min. 33 extra: min. 39	determination of natural tomato soluble solids by Refractometry (1st revision)	Refractometry	
container fill ( <u>volume occupied</u> ). expressed in % vol.	minimum 90 %	determination of volume occupied by the product.	weight	
<u>vacuum</u> . (expressed in mmhg)	minimum 150	determination of vacuum		

## **WORLD PROCESSING TOMATO COUNCIL (WPTC)**

### **2.1 Product definition & 2.2 Product designation (and also in 8.1 Name of the product)**

The lower and higher limit of concentration for tomato puree and tomato paste indicated are the levels proposed by the WPTC. These have been reached through by a compromise between the different national legislations and particularly the EU and USA ones: in the EU the minimum NTS value is 7% while it is 8% in the US. The minimum level of 7% was selected as it enables the classification in the regulation of concentrated juice and lightly evaporated passata.

The intermediate limit between puree and paste (designation present only in the USA regulation) is of limited incidence for the EU because all concentrated are defined in other ways (double, triple concentrate, ...) or by concentration value (8.1 (c)).

#### **3.2.2.3 Mould count**

The issue of mould count has been debated at length within the WPTC. As there is a wide variation of national legislations for this issue (EU 70%, USA 40% Canada 50%), the position which was finally reached within the WPTC is that this item should be taken out of the standards. The concerns of the WPTC members were also that the Howard mould count is a very subjective method of analysis which is highly dependent on the skill of the technician measuring it. Moreover, although this measure is used commonly as a quality specification for trade, a high mould count has no health implication for the consumer. A detailed description of the method can be found in AOAC manual –reference 965.41-.

The WPTC is not opposed to the current wording in brackets.

#### **3.2.2.4 pH**

The WPTC agrees with the current wording stating that pH must be below 4.6. While this is higher than the 4.5 initially requested by the WPTC, 4.6 does not pose any safety risk.

### **5.2 Contaminants**

The WPTC had specifically requested that the value of maximum level of contaminants be related to the fresh tomato solids content and reiterates its commitment to see this reference included in the final standards.