

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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ORGANIZATION



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Agenda Item 3(c)

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CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

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DRAFT CODEX STANDARD FOR PRESERVED TOMATOES
(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

Australia considers that the provision under subsection (c) requiring preserved tomatoes to be cored is unnecessary. Australian manufacturers of preserved tomato products do not core the tomatoes for these products.

Australia proposes that the last sentence of subsection (c) should simply state: *“The tomatoes shall have had the stems and calices removed and shall have been cored, except where the internal core is insignificant as to texture and appearance.”*

2.3 Styles (& Section 8.1.2)

Australia believes that the presentation styles of tomatoes do not require standardisation and would prefer that Section 2.3 be removed with the statement under Section 8.1.2 amended to the effect that:

“The presentation style, and packaging medium as defined in Section 3.1.2, shall be declared as part of the name or in close proximity to the name of the food”.

3.1.2 Packing Media

(a) Juice

Australia questions the need for the footnote under this provision.

Australia notes with the footnote included the provision does not allow for tomato juice diluted from a tomato concentrate. Australian producers commonly dilute tomato puree back to a juice for use in canned tomato products.

Australia questions whether the purpose of the footnote is to specifically exclude this practice. Australia would like to point out that clause (b) of this section would result in a similar outcome. For products in which tomato puree or tomato concentrate is used as packing media, this media would be diluted in the final product.

Australia considers setting a minimum soluble solids level for this reconstituted juice would ensure that the packing media contains sufficient natural tomato soluble solids to be considered a juice.

Australia therefore requests the deletion of the footnote, and suggests this clause is amended to the effect:

“Juice: the unconcentrated, undiluted liquid obtained from ripened tomatoes or from the residue resulting from preparing tomatoes for canning. Juice may also be obtained by diluting a tomato concentrate provided the final juice complies with the minimum Brix level established in the Codex General Standard for Fruits Juices and Nectars.”

3.1.3 Optional Ingredients

Australia supports the inclusion of sugars in the list of optional ingredients. However, Australia believes that the provision under Section 3.1.3(c) for the use of sugars only when acidifying agents are used is unnecessarily restrictive. Australia believes Section 3.1.3 (c) should simply state that *“Sugars, as listed in Codex Standard for Sugars, (CODEX STAN 212 – 1999, Amd. 1 – 2001) with specific labelling.”*

Appropriate ingredient labelling will provide the consumer with the necessary information to allow them to make an informed choice.

3.2.2 Size or Wholeness

Australia believes this clause is unnecessary and would be irrelevant with the removal of Section 2.3 Styles as previously recommended.

3.2.3.1 Peel (only for whole and peeled styles)

Australia believes this clause is unnecessary. Australia considers the standard should focus on consumer health and include only definitions and essential technical criteria that facilitate fair trade and safe food.

In addition Australia notes that this clause would be irrelevant with the removal of Section 2.3 Styles as previously recommended.

3.2.3.2 Blemishes

As with Section 3.2.3.1, Australia believes this clause is unnecessary. Australia considers the standard should focus on consumer health and include only definitions and essential technical criteria that facilitate fair trade and safe food.

3.2.3.3 Mould Count

Australia supports the words in brackets for this section.

3.2.3.4 pH

Australia considers that as pH is critical to controlling microbial growth, the limit should be set at a level that allows sufficient margin of error to account for any natural variations in pH that may occur in the raw material. Australia therefore supports the maximum pH limit of 4.5.

Australia considers that a higher limit would not be sufficient to account for natural variations in tomatoes nor normal fluctuations in pH that can occur during processing. This is a particular concern where pH monitoring is undertaken at timed intervals rather than continuously, as is the case in many Australian manufacturing operations.

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 and include the following specific permissions.”

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).

4.2 Firming Agents

Australia considers any additive in the GSFA that may function as a firming agent should be permissible to the levels prescribed and that this should be clarified in the Standard.

Australia notes that the following firming agents are already permitted at GMP levels under Table 3 of the GSFA: calcium lactate, calcium citrate, calcium chloride, calcium sulphate, calcium gluconate. Australia therefore proposes that these additives are removed from this subsection of the draft standard as they would be covered by the specific reference to the GSFA under a generic additives provision (see comments under Section 4).

Australia notes that mono-calcium phosphate (INS No. 341i) is the only firming agent included in the draft standard which is not currently included in the GSFA. Australia, therefore considers that the CCPFV should request that the Codex Committee on Food Additives and Contaminants (CCFAC) undertake work to assess this additive for inclusion at GMP levels under Table 3 of the GSFA.

Australia considers that it is appropriate to include a specific provision for mono-calcium phosphate in the draft standard whilst this work is undertaken by CCFAC.

7.1.1 Minimum Fill

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

7.1.4 Minimum Drained Weight

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

Furthermore, Australia considers that any declared limits be based on fill weight and not drained weight, as drained weight can vary significantly with the variety and style of tomato product. This is particularly the case with whole peeled products, in which cracked tomatoes can lose their internal fluid component during the drained weight test. These ‘cracked’ tomatoes are not considered to be defects in the Australian market.

8.1.1 The name of the product shall:

Australia suggests the wording of this clause could be simplified as follows:

- (a) *Indicate whether the product is a “Whole” style or another style.*
- (b) *For “Whole” style, indicate whether or not the product is peeled.*
- (c) *Indicate any other characterizing components, such as added herbs.”*

8.1.2

As stated in comments under Section 2.3, Australia proposes that the statement under this section of the draft standard is amended to the effect that:

“The presentation style, and packaging medium as defined in Section 3.1.2, shall be declared as part of the name or in close proximity to the name of the food”.

8.1.3

Australia notes that this clause has not been updated to reflect the current numbering within the draft standard. This paragraph should read:

*“If an added ingredient, as defined in ~~Section 3.2.3~~ **Section 3.2**, gives a characteristic 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.”*

8.1.5

Australia sees no necessity for this clause but has no objection to the words proposed in brackets.

Australia notes, however, that clause (a) has not been updated to reflect the current numbering within the draft standard. This paragraph should read:

*“(a) **the type:** “solid pack” if the pack complies with ~~Section 2.5.2~~ **Section 2.4;**”*

BRAZIL

Item 2.1. c: Brazil agrees.

Item 3.1.3.: Brazil agrees.

Item 3.2.3.3.: 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 3.2.3.4.: Brazil has no comments.

Item 7.1.4.1.: Brazil has no comments.

Item: 7.1.4.2.: Brazil has no comments.

CUBA

3.1.3 (c) Change “acidifying agents” to “sweeteners”.

3.2.3.3 We approve of the content, but propose the 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.

3.2.5 Lot Acceptance

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.

7.1.4.2 A tolerance needs to be defined. We propose up to 2 %.

8.1.5 Section 2.5.2 does not appear in the Draft. We propose beginning the text with “It may

EUROPEAN COMMUNITY

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1.2. Packing Media

Juice: the footnote appearing in the report of the 22nd session of the CCPFV, specifies that the term "juice" used as a cover liquid, and which will be included in the labelling of the product in accordance with the section 8.1.2., does not correspond to the definition of the tomato juice appearing in the general Codex standard for juices and fruit nectars.

On one hand, this raises a real difficulty in relation to consumer information, and, on the other hand, the definition of this liquid medium needs explanations, in particular on the nature of the "residual matters coming from the preparation of the preserved tomatoes".

3.1.3. OPTIONAL INGREDIENTS (C):

The EC proposes to delete alinea (c) of section 3.1.3

3.2.2. SIZE OR WHOLENESS

The rate of 65% of whole tomatoes is low, a higher level should be considered.

3.2.3.3. MOULD COUNT

The presence of an important mould rate in the preserved tomatoes 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 50% of positive fields (Howard's method) determined on the whole (tomatoes and packing media).

EC proposes the following wording for this section 3.2.2.3:

Mould count for processed preserved tomatoes to be set according to the national legislations of the importing countries, without exceeding 50% 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.

4.2. FIRING AGENTS

The European Community does not support the use of the following additives in this food category:

- 341 i Mono-calcium phosphate. JECFA has established for phosphate the tolerable maximum level originating from all sources to 70 mg.
- 516 Calcium sulphate:
- 578 calcium gluconate.

7. WEIGHTS AND MEASURES

Certain provisions of sections 7.1.4.1 and 7.1.4.2. are in square brackets and call therefore for observations.

7.1.4.1.

The EC proposes that for whole peeled or unpeeled preserved tomatoes, the drained net weight shall be at least equal to 56 % of the water capacity of the container.

7.1.4.2. The sentence " [provided that there is no unreasonable shortage in individual containers.]" leaves to much place to non measurable appraisal.

MALAYSIA

2.3 STYLES

Paragraph 2.3.2 Unwhole (Pieces)

Malaysia noticed a typographical error in the paragraph . We proposes the deletion of the word '~~not~~' and replace with the word '**un**', the word '~~with~~' and replace with the word '**to**'.

This paragraph is to read:

“For the unwhole tomatoes the style should be better specified according to the type of grinding or cutting.”

Paragraph 2.3.2(b)

Malaysia proposes to delete the word '~~regularly~~'.

This paragraph is to read:

“(b) Sliced: tomatoes cut perpendicularly to the longitudinal axis in rounds with a regular thickness;

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1.3 Optional Ingredients (c)

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

“~~f~~When acidifying agents are used, sucrose, dextrose and dried glucose syrup, as listed in Codex Standard for Sugars (CODEX STAN 212 – 1999, Amd.1- 2001) with specific labeling~~f~~”.

3.2.3.3 Mould Count

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

“~~f~~Mould count for processed preserved tomatoes to be set according to the national legislation of importing countries~~f~~”.

3.2.3.4 Ph

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

“Maximum level for Ph must be [4.5]”.

3.2.4 Classification of “Defectives”

Malaysia is of the view the inclusion the word '**through section 3.2.3.4**' in the paragraph. The sentence should read as:

“A container that fails to meet one or more of the applicable quality requirements, as set out in Section 3.2 through section 3.2.3.4 shall be considered a “defective”.

3.2.5 Lot Acceptance(b)

Malaysia noticed a typographical error in the paragraph. We propose to delete the word '**3.2.4**' and replace with the word '**3.2.3.3**'.

This paragraph is to read:

“(b) the maximum allowance for mould count is not exceeded (see Section 3.2.3.3)”.

7.1.4 Minimum Drained Weight

Paragraph 7.1.4.1

Malaysia proposes to change the percentage from '**[50%]**' 'to '**[65%]**' in the paragraph to be in line with the paragraph 3.2.2.

8.1. NAME OF THE PRODUCT

8.1.1(c) Malaysia proposes to delete the word '**2.3.5.1**' because we feel that no paragraph 2.3.5.1 in the standard.

Paragraph 8.1.3

Malaysia noticed a typographical error in the paragraph. The word '**Section 3.2.3**' should be '**Section 3.1.3**'.

Paragraph 8.1.5

Malaysia noticed a typographical error in the paragraph. The word '**Section 2.5.2**' should be '**Section 2.4.1**'.

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.

1. As indicated in our comments for the previous proposed draft, [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:

- Last column (Maximum Level) of table 4.1 (Acidity Regulators)
 - Last column (Maximum Level) of table 4.2 (Firming Agents)
2. Section 2.3.3 was incorrectly numbered as section 8.2.3 “Any other presentation of the product shall be permitted provided that...” (See page 39.)
3. The following comments deal with mistakes made in the numbering of some of the sections cited under item 8 (LABELING), which make reference to specific provisions (and not to the Codex General Standard for the Labeling of Prepackaged Foods.)
- In Section 8.1.4, the text found in parentheses “(Section 2.4)” should be replaced with “(Section 2.3.3)” since this is the number of the section that deals with other styles, while Section 2.4 deals with types of pack.
 - In Section 8.1, item (c), "Unpeeled tomatoes", a reference is made to a section that does not exist in this document (Section 2.3.5.1.) The most suitable section available is Section 2.3.
 - There is a numbering error in Section 8.1.3, “If an added ingredient, as defined in Section 3.2.3, gives characteristic flavor to the product...” The section that deals with this matter is Section 3.1.3.
 - There is another numbering error in Section 8.1.4, “If the product is produced in accordance with the other styles provision (Section 2.4), the label shall...,” Section number 2.4 should be changed to 2.3.3.
 - In Section 8.1.5, item (a) indicates the following: “the type: "solid pack" if the pack complies with the requirements of Section 2.5.2”. Such a Section does not exist in this document.

THAILAND

3.2.3.3 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.

3.2.3.4: pH

To be consistent with Draft Codex Standard for Processed Tomato Concentrate, the text should be amended to read “ The pH must be below 4.6”.

Section 4.1 Acidity Regulators

We would like to add “ INS 260 Acetic acid : Limited by GMP” in this section.

6. Hygiene

We suggest inclusion of the following footnote to Section 6.2 as recommended by the 37th 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”.

7.1.4 Minimum Drained Weight

We strongly recommend that the minimum drained weight should be 50%. Drain weight higher than 50% can cause damage of tomato in some varieties of tomato especially the round shape variety.

UNITED STATES

Numbering

The U.S. suggests that numbering found in Section 2.3 (Styles) be revised from number 8.2.3 to 2.3.3.

Section 3.1.3 Optional Ingredients

The bracketed text in Section 3.1.3(c) includes the phrase, "*with specific labeling.*" It is unclear what "specific labeling" means. Does this require declaration in the ingredient statement or next to the name? If only the former, there is no need to state this in Section 3.1.3. Usually when sweeteners are added for this purpose it is not required to be declared in the name of the product, but declared only in the ingredient statement.

Section 3.2.3.3 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 4.1 Acidity Regulators and Firming Agents

The U.S. supports the inclusion of food additive provisions for acidity regulators and firming agents in this standard but does not believe that other food additive functional effects are justified.

Section 4.1 lists acidity regulators and Section 4.2 lists firming agents for use in preserved tomatoes. The U.S. suggests that these sections be replaced with the following statement:

"Acidity regulators and firming agents used in accordance with Table 1 and 2 of the Codex 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.) or listed in Table 3 of the GSFA are acceptable for use in foods conforming to this standard."

Section 7 Weights and Measures

Section 7.1.4.1

The U.S. supports the retention of the bracketed text of this section [50%] for drained weight of the product as the official text of the Proposed Draft Standard. This requirement is contained within Codex Stan 13 -1981, and formerly CAC/RS 13-1969. It is widely accepted and used both by the preserved tomato trade and regulators. To date, the U.S. is unaware of consumer or industry complaints that this provision is not working, and it is concerned that changes to this section would have significant negative implications for the preserved tomato trade.

Section 7.1.4.2

The U.S. recommends that in the absence of any new proposals on this section of over the past six years that better clarifies this requirement in the draft standard; the bracketed text in this section be retained as the official text of the Proposed Draft Standard.

Section 8.1 Name of the Product

Section 8.1.4 states that the Styles Section is contained in Section 2.4. The U.S. notes that the Styles section is contained in Section 2.3.

Section 8.1.5(a) states that "solid pack" may be included on the label if the pack complies with Section 2.5.2. The U.S. notes that the definition for "solid pack" is contained in Section 2.4.1 and not in Section 2.5.2.

URUGUAY

3.1.3 Optional Ingredients:

c) An error was found in denomination: where it says "acidifying agents" it should say "sweeteners".

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

3.2.4 Uruguay suggests that in the Spanish version, the word "envases" ["containers"] be changed to "producto" ["product"]

3.2.4 Lot Acceptance

In point 3.2.5 b), where it says 3.2.4, it should say 3.2.3.3.

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

VENEZUELA

1. SCOPE OF APPLICATION:

“This Standard applies to the product as defined in Section 2 and offered for direct consumption, including use in hospitality or for re-packaging when necessary. This standard also applies to product when indicated as being intended for further processing. **The provisions of this Standard also apply to canned tomatoes flavored or seasoned with natural vegetable products (onion, pepper, paprika, celery or any other product approved by the competent Health Authority), without exceeding 10 % m/m of the product.**

2. DESCRIPTION:

2.1 DEFINITION OF THE PRODUCT

CANNED TOMATOES is understood as:

The fresh, healthy fruit of the *Lycopersicon esculentum* (P. Mill), with consistent structure and in the proper state of botanical maturity, washed, scalded, peeled or unpeeled, from which the stem has been removed, with or without the addition of salt and/or sugar, spices, packed in its own juice and processed by a heat adequate to ensure its preservation in hermetic containers.

2.3 STYLES

2.3.2 Unwhole (Pieces): Tomatoes **CUT** into sections, whose form may be regular or irregular.

For tomato pieces, the style shall be specified according to the type **OF CUT**:

(d)Pulp, **CRUSHED TOMATOES**: tomatoes made into pulp or crushed, as applicable. **VENEZUELAN STANDARDS DO NOT INCLUDE THIS TYPE OF PRODUCT IN ITS CLASSIFICATION.**

All other styles shall be permitted ...

2.4 TYPES OF PACK

2.4.1 SOLID PACK: **DEFINE WHETHER THIS PACK IS THE ONE THAT WILL CONTAIN TOMATO PULP OR CRUSHED TOMATOES, SINCE THIS IS THE ONE THAT WOULD NOT NEED ANY TYPE OF PACKING MEDIUM.**

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS.

3.1 COMPOSITION

3.1.3. Optional Ingredients

(a) Spices, aromatic plants (such as basil leaves) and natural extracts of these and seasonings; **onion, pepper, paprika, celery and any other ingredient approved by the competent Health Authority**, excluding tomato flavoring.

(c) When (acidifying agents) are used, dry nutritive sweeteners like **saccharose**, dextrose and dried glucose syrup, as listed in the Codex Standard for Sugars (CODEX STAN 212 – 1999, Amd. 1 – 2001) with specific labeling.

3.2 QUALITY CRITERIA

3.2.1 DEFINITION OF DEFECTS AND OTHER TERMS USED IN SECTION 3.2.

3.2.1.1 Whole or Almost Whole: a tomato of any size whose **CONTOUR** has not been significantly altered by **CUTTING**;...

3.2.4 SIZE OR WHOLENESS

Size or wholeness, as such, is only a factor in the “Whole Tomato” style. Preserved tomatoes of “Whole” style shall consist of not less than 65% (**80%**) m/m of drained tomatoes in whole or semi-whole units **with firm consistency**, except that in any container there may be one unit that is not whole.

3.2.3 DEFECTS AND TOLERANCE

3.2.3.1 Peel (only for whole and peeled styles):

Whole peeled: not more than **(15)** cm² aggregate area per kg of total content.

3.2.3.2 Blemishes

Not more than 3.5 cm² aggregate area per kg of total content. **FREE FROM BLEMISHES.**

3.2.3.3 Mold Count

For preserved tomatoes packed with or without tomato juice, pulp, puree or paste, the lot shall be considered nonconforming if, when the liquid obtained by mixing the tomatoes and the cover liquid is analysed, the average mould count in 6 samples is more than 50%. **Mold hyphas: maximum of 20% of positive fields and comply with commercial sterility requirements.**

3.2.3.4 pH

The maximum pH level shall be **4.2**

3.2.4. CLASSIFICATION OF DEFECTIVE **PRODUCTS**

The **PRODUCTS** that fail to meet one or more requirements.....

3.2.2 LOT ACCEPTANCE

The paragraph “These acceptance criteria do not apply to containers intended for wholesale” SHOULD BE REMOVED since the product to be sold wholesale should comply with what is established in the standard, since the only thing that changes is its presentation (institutional containers or containers larger than one gallon), not the processing.

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.

4.2. FIRMING AGENTS:

Calcium salts as firming agents may be added such that calcium ion content in the end product in the style unwhole is not greater than 0.08% (**0.03 %**), and calcium ion content in the end product in the style “whole” is not greater than 0.045% (**0.03 %**).

A minimum concentration of calcium salts firms the end product, making it acceptable. Venezuela suggests that the calcium ion content in the end product (whole and pieces) should not be higher than 0.03 %, since higher quantities would permit the use of overripe tomatoes in the processing of this product.

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:

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

7. WEIGHTS AND MEASURES

7.1 CONTAINER FILL

7.1.1 Minimum Fill

CLARIFICATION IS NEEDED FOR THE TERM FLEXIBLE CONTAINERS, WHETHER THEY ARE BAGS, BOTTLES MADE OF DIFFERENT RESINS, ETC.

7.1.4. Minimum Drained Weight

7.1.4.1. The drained weight of the product should be not less than 50% (**80%**), calculated on the basis of the weight of distilled water at 20°C which the sealed container will hold when completely filled.

8. LABELING.

8.1 NAME OF THE PRODUCT

8.1.1 The name of the product shall be:

(a) UNWHOLE TOMATOES OR PIECES, for the other styles.

(d) FLAVORED OR SEASONED TOMATOES. Whole tomatoes or pieces to which natural vegetable products are added, such as onion, pepper, paprika, celery and any other product approved by the competent Health Authority, without exceeding 10 % m/m of product.

8.1.4 and 8.1.5 DO NOT APPLY FOR VENEZUELA, ALL PRODUCTS DEFINED IN THIS STANDARD ARE SOLD WITH A COVERING LIQUID.

9. METHODS OF ANALYSIS AND SAMPLING

PROVISION	LEVEL	METHOD	PRINCIPLE
container fill (<u>volume occupied</u>). expressed in % vol.	minimum 90 %	determination of volume occupied by the product.	weight
<u>vacuum.</u> (<i>expressed in mmhg</i>)	minimum 150	determination of vacuum	
drained weight. expressed %	minimum 80%	determination of drained weight.	weight
mold count	mold hyphas max. 20% of positive fields	determination of mold hyphas "Howard method"	
ph	not greater than 4.2	determination of ph (ionic acidity)	potenciometry

WORLD PROCESSING TOMATO COUNCIL (WPTC)**2.1 Product definition**

The WPTC consensus is that the mention in bracket in (c) should be included in the final standard.

3.1.3 Optional ingredients

The WPTC consensus is that the mention in bracket should be included in the final standard.

3.2.3.3 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, 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 965.90-.

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

3.2.3.4 pH

The WPTC agrees with the current wording in brackets stating that pH must be below 4.5.

7.1.4.1 Minimum drained weight

For the minimum drained net weight, the WPTC has reached a consensus of 50%. Despite the EU legislation currently being set at 56% of container capacity, the level of 50% has been accepted by the Italian, French, Greek, Portuguese and Spanish members of the WPTC.

8.1.5 Labelling

The WPTC consensus is that the mention in bracket should be included in the final standard.