

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 8

CX/PFV 08/24/10-Add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

24th Session
Arlington, VA (Washington DC metro area), U.S.A.,
15 – 20 September 2008

PROPOSED LAYOUT FOR
CODEX STANDARDS FOR PROCESSED FRUITS AND VEGETABLES

Comments from Brazil and India

BRASIL

Some additional comments to support the proposal within the explanatory notes of CX/PFV 08/24/10 and Brazil previous comments:

According to Paras. 5, 6, 7 and 8 of CX 08/24/10, Brazil endorses that the proposal should proceed gradually “by adjusting the layout based on the progress made on the revision of other standards for processed fruits and vegetables”.

Particularly, considering that the current proposal of Layout may be highly biased towards the canned products standards, at this point, as highlighted in Para 7 (CX 08/24/10) the Committee could consider embracing other individual standards for certain processed fruits and vegetables (chutneys, relishes, purees etc) to keep the proposal of Layout as broad as possible, and to evaluate further adjustments to other products in an on going way.

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
2.6 Varietal Types	To broad the scope.	To broad the scope of the document, Brazil suggests the construction:	Any commercially cultivated variety (cultivar) suitable for canning [processing] may be used.

Although some processed products don't need naming the species or cultivated variety, the practice is not a rule of thumb.

Besides this, not naming the species or cultivated variety can be prejudicial to consumer interests, especially as regards fraudulent practices, and could result in unfair competition between operators.

Bringing an example palmitos may be obtained from the bitter flavored *Syagrus oleracea* Becc, or the more sweet and delicate flavored *Euterpe edulis*, *Euterpe oleracea* and *Bactris gasipae* cuts, among many other palm trees with different flavors.

Considering that taste differs among species not naming can bring difficulty to allow consumer attainment to preferred or better quality palms.

Other examples can arise like the need for clarification during the 23rd Session of CCPFV, to the scientific name of “green mustard” at the Pickled standard.

Other specific comments:

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
2.4 Types of Colour	Broad the scope.	As colour changes due to the adopted process and ingredients or additives added and mixed, Brazil proposes:	The addition of the expression: “Characteristic” as a new paragraph; and the phrase “When applicable, considering the homogeneity of the product”, as another isolate paragraph.
2.7.1 Other Styles	Clarification	Brazil would like to share its preference to the first construction, considered more detailed.	Adopt Any other presentation of the product should be permitted provided that the product: (a) is sufficiently distinctive from other forms of presentation laid down in the Standard; (b) meets all relevant requirements of the Standard, including requirements relating to limitations on defects, drained weight, and any other requirements which are applicable to that style which most closely resembles the style or styles intended to be provided for under this provision; and (c) is adequately described on the label to avoid confusing or misleading the consumer.
3.1.1 Basic Ingredients	Clarification	As proposed.	Brazil would like to highlight the possibility of adding examples to the item.
3.2. Quality Criteria	Clarification	Brazil would like to share its preference to the second construction, considered more detailed.	Adopt [Common name of the product] <i>should have colour, flavour, odour and texture characteristic of the product.</i>

Although microbiological criteria are not recommended for products rendered commercially sterile, sterility tests for low acid canned foods and pH tests for acidified low-acid foods, micotoxins tests for dried products should be considered provisions at the layout.

Bringing an example Hydrocyanic acid content is considered at EDIBLE CASSAVA FLOUR Codex Stan 176 (1989-95).

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
3.4 Lot Acceptance	Scope	Brazil suggests the addition of sub item “c”:	(c) not overlap any other relevant provision to the safety of the product.

General comments:

7.1.1 MINIMUM FILL

Brazil would like to share its awareness that this provision is more related to the adopted process and should lead to a technical barrier for future innovation and trade.

Considering that the mass of a product in a can is closely related to the quantity of vacuum acquired and, consequently, to the final characteristic of the process aiming the quality and safety of the product, all the diversity of cans and products may be a constraint to the adoption of this provision in full.

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
7.1.1 Minimum Fill	Clarification	<p>The writing of provision “minus any necessary head space according to good manufacturing Practices” is broad, clarifying and a result of consensus at the 23rd Session of CCPFV (Paras. 33 & 34 – ALINORM 07/30/27).</p> <p>Products that do not need this provision are also not subjected to minimum fill specification.</p>	<p>Refrain provision [minus any necessary head space according to good manufacturing practices]² from being associated with footnote nr 2 - {Depending on the nature of produce the provision(s) in brackets may be removed as not applicable/necessary}</p>

INDIA

Agenda Item 8: Proposed layout for CODEX standard for processed fruits and vegetables

Section 2: Description

Subsection 2.6: Varietal types: India supports, ‘Any commercially cultivated variety (cultivar) suitable for canning may be used.’

This statement is appropriate, as specifically listing down varieties will result in the amendment of standard whenever a new commercial variety is developed. This will just hamper the use of that commercial variety till it gets incorporated in the standard.

Subsection 2.7.1: India supports the following option for the Other Styles

Other styles: Any other presentation of the product should be permitted provided that the product:

- is sufficiently distinctive from other forms of presentation laid down in the Standard;
- meets all other requirements of the standard, as applicable; and
- is adequately described on the label to avoid confusing or misleading the consumer.

The above option is appropriate because when the product has no style it is difficult to compare to the most closely resembling style.

Section 3: Essential composition and Quality factors

Subsection 3.1.2: India supports I(a) and I(b)

I(a) In accordance with the Codex Guidelines on Packing Media for Canned Fruits (CAC/GL 51-2003) and/or Codex Guidelines on Packing Media for Canned Vegetables (CAC/GL ##-###) (as appropriate).

I(b) In addition, the following specific provisions apply:

The above option for packing media is acceptable, as otherwise restrictive approach on the packing media will be followed.

Section 4: Food additives: India supports option II.

Option II: [Food Additive functional class] used in accordance with Tables 1 and 2 of the Codex General Standard of Food Additives in food category x.x.x.x [food category name] or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.

The Option II is appropriate as it is as per the Format of Codex Commodity Standard (Reference 17th Edition of Procedural Manual).