

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 3

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

25th Session
Bali, Indonesia,
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PROPOSED DRAFT CODEX STANDARD FOR GRATED DESSICATED COCONUT (Revision of CODEX STAN 177-1981)

COMMENTS FROM: Brazil, Colombia, Kenya, Malaysia, Mexico and the United States of America

BRAZIL

In regard to the aforementioned draft standard, Brazil would like to share some general and specific comments.

General comments:

Section 2.2 STYLES.

Brazil strongly supports keeping current 55% lower limit for fat content provision of CODEX STAN 177-1991 in the proposed revision, and the new proposed ranges established for the new section on styles as it better differentiates best quality product and limits trade of low oil content desiccated coconut.

Furthermore current lower limit is in force for years, without being considered or notified as constrain to commerce.

Section 4. FOOD ADDITIVES.

Codex Alimentarius Commission Procedural Manual 18th edition, page 46 (English version) reinforces the need that additives recommendation "...should be prepared in accordance with guidance given in the section on Food Additives in the *Relations between Commodity Committees and General Subject Committees*, ...".

Considering the Definitions of Food Additives for the purposes of the Codex Alimentarius (Procedural Manual 18th edition, page 17), additives use should be restricted where possible.

Moreover the expertise for technological justification relies on Commodity Committee and Brazil considers the need to highlight that it is advisable to exercise this competence to achieve the purposes of *Codex Alimentarius* for Standards that contain provisions with which it is essential to comply.

Therefore, Brazil recommends that future standard could reflect current technological practice, being only Sulfites the possible additive to be used in Grated Desiccated Coconut.

Sulfites also need to be allowed as bleaching agent in Grated Desiccated Coconut production as oxidation process is fast and leads to an unacceptable yellowish or darker product.

Specific Comments:

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
2.2.1 Grated desiccated coconut with respect to oil content may be designated as:	Preferred Wording	As current standard does not allow fat content below 55%, it seems that ranges lower than that limit would need further technical justification.	(a) Low fat desiccated coconut – product with total oil content between [35] [50] and ≤ [50] [55]%. (b) Medium fat desiccated coconut – product with total oil content between [50] [56] up to 62%. (c) (b) High fat desiccated coconut – product with total oil content above 62%.

Section and sentence/paragraph	Type of change	Rationale	Proposed changes
3.2.4 Definition of Defects and Allowances	Preferred Wording	For consistency with previous proposal (section 2.2.1), above.	(c) Oil content
			> [25] [50] < [50] [55] % m/m for low fat product
			≥ [50] [55] ≤ 62% m/m for medium low fat product. > 62% m/m for high fat product.
3.2.4 Definition of Defects and Allowances	Addition	Seeking fair practices in the food trade, a footnote may be added stating that the Fatty acid composition of the oil fraction should comply with the <i>Codex</i> standard for named vegetable oils (<i>CODEX STAN 210-1999</i>)	(c) Oil content*
			<u>* The Fatty acid composition of the oil fraction should comply with the Codex standard for named vegetable oils (CODEX STAN 210-1999).</u>
4. FOOD ADDITIVES	Preferred Wording, Clarification	Brazil supports striking out the square brackets. Moreover as sulfites are used as bleaching agents, this use should be listed for clarification.	¶ The following preservatives and bleaching agents used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 0.4.1.2.2 – Dried Fruits, within the maximum levels and conditions specified, are acceptable for use in foods conforming to this Standard. ¶
4. FOOD ADDITIVES	Insertion	A new wording allowing food additives listed in Table 3 of Codex General Standard for Food Additives, but restricted to the legislation of the country of retail sale, may be used seeking flexibility of the standard, without constrains to further technological development	<u>Food Additive functional class as listed in Table 3 of the General Standard for Food Additives are acceptable for use, in accordance with the legislation of the country of retail sale.</u>
4.1 PRESERVATIVES	Addition	For consistency with previous proposal (section 4), above.	4.1 PRESERVATIVES <u>AND BLEACHING AGENTS</u>
10. METHODS OF ANALYSIS AND SAMPLING	Addition	For consistency with previous proposal (section 3.2.4 (c)), above. Source: <i>CODEX STAN 210-1999</i>	Provision <u>Fatty acid composition of the oil fraction</u> Method <u>According to ISO 5508: 1990 and 5509: 2000; or AOCS Ce 2-66 (97), Ce 1e-91 (01) or Ce 1f-96 (02).</u> Principle <u>Determination of GLC ranges</u>

COLOMBIA

Below are itemized the changes made to the document:

ITEMS	POSITION PROPOSAL	OBSERVATIONS OR COMMENTS
<p>2. Product definition</p> <p>Is understood to be grated desiccated coconut the product that is:</p> <p>(a) prepared from substantially sound white meat obtained from the whole nut of the coconut (<i>Cocos nucifera</i> L.), having reached appropriate development for processing and free of disease;</p> <p>(b) processed in an appropriate manner, undergoing operations of de-husking,, hatcheting, paring, comminuting, drying, and sifting; and</p>	<p>Item a), is suggested to eliminate the term “substantially”.</p> <p>(a) prepared from sound white meat obtained from the whole fruit of the coconut (<i>Cocos nucifera</i> L.), having reached appropriate development for processing, and free of disease;</p> <p>In item b) the following terms are not clear: Hatcheting Paring Comminuting</p> <p>Is suggested to change the above mentioned terms with: <u>peeling and milling</u>.</p> <p>(b) processed in an appropriate manner, undergoing processes of shelling, <u>peeling, milling</u>, drying, and sifting; and</p>	<p>Because it is an ambiguous term, it must come from a healthy product to guarantee a sound product during all stages of processing.</p> <p>The preceding, because it agrees with the production process for dried grated desiccated coconut.</p>
<p>2.2 STYLES</p> <p>2.2.1 Grated desiccated coconut with respect to oil content, may be designated in the following manner:</p> <p>(a) Low fat desiccated coconut - product with a total oil content between [35] [50] and < [50] [55] %.</p> <p>(b) Medium fat desiccated coconut - product with a total oil content between [35] [50] and < [56] [55] %.</p>	<p>In accordance with the parameters proposed in items a) and b), we propose the following ranges:</p> <p>(a) Low fat desiccated coconut - product with a total oil content, <u>between 35% and < 50%.</u></p> <p>(b) Medium fat desiccated coconut - product with a total oil content between <u>50% and < 56%.</u></p>	<p>The preceding supported by national industry experience (laboratory results and reports).</p> <p>According to information provided by the industry, the grated desiccated coconut processed in Colombia has a total oil content of >50%, so we would be talking about medium and high fat content.</p>

ITEMS	POSITION PROPOSAL	OBSERVATIONS OR COMMENTS
<p>3.2.4 Definition of defects and Allowances</p> <p>(b) Moisture. Loss in mass measured under the operating conditions specified $\leq 4\%$ m/m.</p>	<p>3.2.4 Definition of defects and Allowances</p> <p>(b) Moisture. Loss in mass measured under the operating conditions specified. <u>$\leq 6.0\%$ m/m.</u></p>	<p>The humidity percentage considered in the standard proposal is a maximum of 3.9%, however, a desiccated coconut with this moisture is very dry and loses contexture in its nut, because it tends to break easily.</p> <p>The ideal moisture would be between 4.0% up to 6.0%; through experience has been found that desiccated grated coconuts with humidity over 6.0%, one month later get fungi, causing fermentations, change their color to yellow, and develop an unpleasant odor; nevertheless, some national producers leave their product with a humidity of up to 8.0%, but this product does not last more than 2 months.</p> <p>Is worth mentioning that the dried grated coconut processed in Colombia does not have added additives (preservatives); it is a natural product.</p>
<p>3.2.4 Definition of defects and Allowances</p> <p>(c) Oil content:</p> <p>Total oil content in product under the operating conditions specified</p> <p>$> [35] [50] < [50] [55]$ % m/m for low fat product.</p> <p>$\geq [50] [55] \leq 62$ % m/m for medium fat product.</p> <p>$> 62\%$ m/m for high fat product</p>	<p>In accordance with the parameters proposed in items a) and b), we propose the following ranges:</p> <p><u>$\geq 50\%$</u> m/m in the case of products with low fat content.</p> <p><u>$\geq 56\%$</u> m/m in the case of products with medium fat content.</p> <p>$> 62\%$ m/m in the case of products with high fat content.</p>	<p>The preceding supported by national industry experience (laboratory results and reports).</p> <p>In regards to oil content in products with medium fat content, we suggest considering the range proposed in item b) of numeral 2.2.1.</p>
<p>4. FOOD ADDITIVES</p> <p>[The following preservatives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 04.1.2.2 – Dried Fruits, within the maximum levels and conditions specified, are acceptable for use in foods conforming to this Standard].</p>		<p>Regarding this point, in our country natural desiccated coconut does not have additives.</p> <p>We request INVIMA support.</p>

KENYA

Kenya would like to submit its comments as indicated below:

In clause 2.2 Kenya proposes to remove the square brackets on the proposed figures and strike the ones to be deleted in a) and b) as well as in the table of classification of defects in clause 3.3.

2.2 STYLES

2.2.1 Grated desiccated coconut with respect to oil content may be designated as:

- .(a) **Low fat desiccated coconut** – product with total oil content between **35%** ~~[50]~~ and **< 50** ~~[55]~~%.
- .(b) **Medium fat desiccated coconut** – product with total oil content between **50** ~~[56]~~ up to **62%**
- .(c) **High fat desiccated coconut** – product with total oil content **above 62%**.

3.2.4 Definition of Defects and Allowances**3.3 CLASSIFICATION OF “DEFECTIVES”**

Defects	Definition	Tolerances	KENYA COMMENTS (TOLERANCE)
(a) Total acidity	Fat acid content in free forms, extracted and measured under the operating conditions specified.	≤ 0.3% m/m measured as lauric acid	<i>We have No objection</i>
(b) Moisture	Loss in mass measured under the operating conditions specified.	≤ 4% m/m	<i>We have No objection</i>
(c) Oil content	Total oil content in product under the operating conditions specified.	> [35] [50] < [50] [55] % m/m for low fat product	<i>We propose greater than 35% m/m and less than 50% m/m for low products</i>
		≥ [50] [55] ≤ 62% m/m for medium fat product	<i>We propose ≥ 50 and ≤ 62% m/m for medium fat product</i>
		> 62% m/m for high fat product	<i>We have no objection since our coconut oil can reach even 80% and this depend on good husbandary practice.</i>

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

General Comments

We propose that it would be necessary to give a number to the clause of ‘classification and defects’ in a table form to be in consistent with other codex standards.

FOOD ADDITIVES**comment**

We propose that on the food additives section, there is need to make reference to GSF A

Kenya would like it to be noted that the technological need for a large proportion of these additives has already been justified in the process of their inclusion in GSF A.

~~[The following preservatives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 0.4.1.2.2 – Dried Fruits, within the maximum levels and conditions specified, are acceptable for use in foods conforming to this Standard.]~~

MALAYSIA**2. DESCRIPTION****2.2 STYLES**

2.2.1 Grated desiccated coconut with respect to oil content may be designated as:

- (a) **Low fat desiccated coconut** – product with total oil content between ~~{35}~~ ~~{50}~~ and ~~< {50}~~ ~~{55}~~%.
- (b) **Medium fat desiccated coconut** – product with total oil content between ~~{50}~~ ~~{56}~~ up to 62%
- (c) **High fat desiccated coconut** – product with total oil content above 62%.

Comments:

Malaysia proposes the values between 35 and < 50% for low fat desiccated coconut, and between 50 up to 62% for medium fat desiccated coconut. The proposed value of total oil content is achievable for the various styles of product.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS**3.2 QUALITY FACTORS****3.2.4 Definition of Defects and Allowances**

Defects	Definition	Tolerances
(a) Total acidity	Fat acid content in free forms, extracted and measured under the operating conditions specified.	≤ 0.3% m/m measured as lauric acid
(b) Moisture	Loss in mass measured under the operating conditions specified.	≤ {4} 3 % m/m
(c) Oil content	Total oil content in product under the operating conditions specified.	> {35} {50} < {50} {55} % m/m for low fat product
		≥ {50} {55} ≤ 62% m/m for medium fat product
		> 62% m/m for high fat product
(d) Ash	Total mineral content in product under the operating conditions specified	≤ 2.5% m/m
(e) Extraneous vegetable material	Harmless vegetable matter associated with the product.	≤ 15 10 fragments per 100 g
(f) Foreign matter	Any visible and/or apparent matter or material not usually associated with the product.	Absence in 100g

Comments:

Malaysia would like to propose the moisture content to be less than or equal to 3.0%. This level is achievable and will ensure product quality and minimise spoilage of the product.

Malaysia is of the view that the value for fragments per 100g be less or equals to 10. This is to minimise presence of defects in a processed product.

4. FOOD ADDITIVES

{The following preservatives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 0.4.1.2.2 – Dried Fruits, within the maximum levels and conditions specified, are acceptable for use in foods conforming to this Standard.}

Comments:

Malaysia notes that food category 0.4.1.2.2 of the GSFA lists other food additives including sweeteners. Whereas, the draft proposed standard lists residual sulphites only to function as preservatives. The Committee may consider requesting the Codex Committee on Food Additives inclusion of a note to exclude the use of other additives other than sulphites in desiccated coconut for this food category.

4.1 Preservatives

Comments:

Malaysia would like to propose a maximum level of 50 mg/kg of residual sulphites in desiccated coconut. The Codex GSFA allows residual sulphites in desiccated coconut not to exceed 50 mg/kg as specified in Note 135, Tables 1 and 2 of the Codex GSFA.

MEXICO

4. FOOD ADDITIVES

The following preservatives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 04.1.2.2 – Dried Fruits, within the maximum levels and conditions specified, are acceptable for use in foods conforming to this Standard.]

4.1 PRESERVATIVES

INS No.	Name of the Food Additive	Maximum Level
220	Sulfur dioxide	<p>200 mg/kg expressed as residual SO₂ in the final product (singly or in combination)</p> <p>We support the proposal as these additives are already regulated in CODEX STAN 192-1995</p>
221	Sodium sulfite	
222	Sodium hydrogen sulfite	
223	Sodium metabisulfite	
224	Potassium metabisulfite	
225	Potassium sulfite	
227	Calcium hydrogen sulfite	
228	Potassium bisulfite	
539	Sodium thiosulfate	

UNITED STATES

The United States of America submits the following comments in support of the activities of the Codex Commission and the Codex Committee on Processed Fruits and Vegetables.

Specific Comments:

2.2 STYLES

While the U.S supports the proposed style designations that include percentages for fat content, we would like to take this opportunity to point out to the CCPFV and the Grated Desiccated Coconut working group that, the use of the term "high" and "low" in the product's name is considered a nutrient content claim. Therefore, we would not support calling a product with 55% fat "Low Fat" and recommend the use of other style designations in this regard.

4. FOOD ADDITIVES

The United States draws attention to the recommendation of the 58th session of the Executive Committee of Codex Alimentarius that was endorsed by the 28th session of the Codex Commission, which says "the GSFA should be the single authoritative reference point for food additives and this should be made clear in all commodity standards" (Alinorm 05/28/3A paragraph 56 [15]). In this regard, the United States recommends that this Draft Revised Codex Standard for Grated Desiccated Coconut adhere to the aforementioned decision. The United States suggests the following revision (**in bold**):

4. FOOD ADDITIVES

“[**The food additive functional class** The following preservatives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 0.4.1.2.2- Dried Fruits, within the maximum levels and conditions specified, is acceptable for use in foods conforming to this standard.]