

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 10

CX/ASIA 25/23/10-Add.1
September 2025
Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Twenty-third Session

Nanning, Guangxi Zhuang Autonomous Region, China

22–26 September 2025

DRAFT REGIONAL STANDARD FOR QUICK-FROZEN DUMPLINGS (Asia)

Comments at Step 6 in reply to CL 2025/56-ASIA

(submitted by Egypt, India, Japan, Thailand)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/56-ASIA¹ issued in August 2025. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCASIA>

ANNEX**GENERAL AND SPECIFIC COMMENTS**

COMMENT	MEMBER/ OBSERVER
2.1. Product definition Quick-frozen dumplings are prepared from unleavened-unleavened/leavened dough made from flour with fillings of one or more ingredients, e.g. meat, poultry, eggs, aquatic products, fruits and vegetables, nuts, and their derived products. The filling should be wrapped into a rolled piece of dough and may or may not be cooked before being quickly frozen. Rationale: The products made from only unleavened dough are considered in the existing definition; however, some dumplings use fermented batter/dough. To include such items it is suggested to add leavened dough/batter in product definition, unless these are covered under a separate Food Category.	India
3.1.1. Basic ingredients Wheat flour and/or other kinds of flour, e.g. corn flour, rice flour, coarse grain flour, buckwheat flour, cereal grains flour, starch, etc. India proposes to expand the basic ingredients list to explicitly include whole maize flour and various millet flours (e.g., finger millet [ragi], pearl millet [bajra], foxtail millet, sorghum [jowar], little millet, kodo millet, barnyard millet) as permissible dough bases. Rationale: This will encourage diversification and use of climate-resilient cereals, promote cereal diversity in dumpling skin formulations and provide gluten-free options for certain consumer segments.	India

COMMENT	MEMBER/ OBSERVER
4. FOOD ADDITIVES [Acidity regulators, colours, preservatives, raising agents, stabilizers, humectants, thickeners and emulsifiers in accordance with Tables 1 and 2 of the <i>General standard for food additives</i> (CXS 192-1995) in food category 06.4.3 (Pre-cooked pastas and noodles and like products (excluding products of food category 04.1.2.12 and 06.5)) or listed in Table 3 of the <i>General standard for food additives</i> (CXS 192-1995) are acceptable for use in foods conforming to this standard. Japan supports proposed Section 4 in this draft from the point of view of establishing GSFA as the general reference. We would like to note, however, that some food additives listed in Tables 1 and 2 in food category 06.4.3 have notes that allow use in specified foods only(e.g. note 152 "For use in instant noodles only"). In practice, they are also used in quick frozen dumpling conforming to this standard. We suggest that CCASIA should request CCFA to revise Tables 1 and 2 of GSFA to include quick frozen dumpling appropriately, and that CCASIA should send information on the use levels of additives to be amended in the Tables for consideration by CCFA. The use levels of the additives listed in Tables 1 and 2 of GSFA in Japan are as follows. [Propylene glycol alginate(INS 405)] Used at 2,000 mg/kg as Thickener and used at 1,600 mg/kg as stabilizer. [Propylene glycol esters of fatty acids(INS 477)] Used at 700 mg/kg as Emulsifier. [PHOSPHATES(INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i), (ii); 343(i)-(iii); 450(i)-(iii), (v)-(vii), (ix); 451(i), (ii); 452 (i)-(v); 542)] Used at 2,500 mg/kg as Acidity regulator and Humectants and used at 50 mg/kg as Emulsifier. [SUCROSE ESTERS(INS 473; 473a: 474)] Used at 1,000 mg/kg as Emulsifier. [CAROTENES, BETA- (INS 160a(i), (iii), (iv))] Used at 3 mg/kg as colour. [SULFITES (INS 220-225; 539)] Used at 0.05 mg/kg as Preservative.	Japan

COMMENT	MEMBER/ OBSERVER
4. FOOD ADDITIVES In principle, Thailand has no objection to the use of food category 06.4.3 (Pre-cooked pastas and noodles and like products). However, we request clarification on whether food category 06.4.3 can really be used as the main composition of the dumplings might be the filling instead of the skin. So, the whole product might not be well covered under the description of the food category (06.4.3). [Acidity regulators, colours, preservatives, raising agents, stabilizers, humectants, thickeners flavour enhancers¹ and emulsifiers in accordance with Tables 1 and 2 of the <i>General standard for food additives</i> (CXS 192-1995) in food category 06.4.3 (Pre-cooked pastas and noodles and like products (excluding products of food category 04.1.2.12 and 06.5)) or listed in Table 3 of the <i>General standard for food additives</i> (CXS 192-1995) are acceptable for use in foods conforming to this standard. Footnote to be added: ¹For use in filling only. We would like to ask for a clarification about “raising agents” whether it is necessary or not as the product definition specified that the product is made from unleavened dough. In Thai products, food additives such as INS 621 (Monosodium L-glutamate), INS 627 (Disodium Guanylate), INS 631 (Disodium Inosinate), and INS 635 (Disodium 5'-Ribonucleotides) are used as flavour enhancers in the filling of dumplings. So, we would like to propose adding flavour enhancers in the text under Section 4 Food additives together with a footnote to specify that the use of these additives is permitted only for the fillings, and not for the dumpling skin. We propose deleting the phrase “(excluding products of food category 04.1.2.12 and 06.5))” as it is ambiguous and unnecessary and may cause confusion in the interpretation of the standard. If some particular dumplings fall under food category 04.1.2.12 or 06.5, the manufacturers should use food additives in accordance with the mentioned food categories 04.1.2.12 and 06.5.	Thailand
4. FOOD ADDITIVES [Acidity regulators, colours, preservatives, raising agents, stabilizers, humectants, thickeners and emulsifiers in accordance with Tables 1 and 2 of the <i>General standard for food additives</i> (CXS 192-1995) in food category 06.4.3 (Pre-cooked pastas and noodles and like products (excluding products of food category 04.1.2.12 and 06.5)) or listed in Table 3 of the <i>General standard for food additives</i> (CXS 192-1995) are acceptable for use in foods conforming to this standard. Egypt agrees on the mentioned food category , and recommends the amendment of the name of the food category 06.4.3 to include also uncooked products.	Egypt
8.1. Name of the product The name of the product shall be “quick-frozen dumplings” ”” and and may be accompanied with that of the filling. The label should properly indicate that the package contains “raw dumplings” or “cooked dumplings”. Other names may be used in accordance with the law and custom of the country in which the product is sold and in a manner not misleading to consumers. We suggest adding a clause to clarify that the name of the product may be accompanied with the name of the filling, such as meat, seafood, vegetables, etc. This amendment will help with clarity of the product's name which will better inform consumers about the product characteristics.	Thailand