

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 8 and 9

ASIA20/CRD12

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Twentieth Session

New Delhi, India, 26-30 September 2016

COMMENTS OF THAILAND

PROPOSED DRAFT REGIONAL STANDARD FOR LAYER PRODUCTS

Thailand has comments on the proposed and concluded text as follows;

2. DESCRIPTION

2.1 Product Definition

Laver products should be prepared from good quality of laver. Thus, the sentence should be replaced “raw” by “fresh” or “sound” in order to be more specified. Thailand would like to propose this section as follows;

“Laver products are those prepared mainly with ~~raw~~ [from fresh/sound](#) laver, which belongs to the genus *Pyropia*.”

2.3 Product Types

2.3.1 Dried Laver Products

The criteria of foreign matters should be moved to section 3.2 Quality factors because this quality factor should be identified for all product types. Thus, the sentence “While non-retail product may contain edible foreign matters, they shall be identified and appropriately communicated” should be deleted.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.2 Quality Factors

- A_w is the indicator for food safety, while the moisture content is the indicator for quality of products. Therefore, Thailand is of the opinion that criteria for both A_w and moisture content should be established in this section.

- According to the provided in Section 2.3.1 that the criteria of foreign matters be moved to section 3.2 Quality factors. Thailand is of the opinion that criteria of foreign matters should be specified in this section.

- Thailand supports the deletion of criteria of “3.2.3 Peroxide Value”

4. FOOD ADDITIVES

Our products did not use the sweetener so. Thailand would like to delete the sweetener.

In our opinion, Thailand proposes the sentence to be as follows;

“Acidity regulators, Anticaking agents, flavor enhancers, ~~sweeteners~~, thickeners and antioxidants used in accordance with Tables 1 and 2”

7. WEIGHTS AND MEASURES

7.2 Packaging

Thailand would like to delete this section because:

According to Section 6 Hygiene which referring to RCP 1 -1969, the first paragraph of Section 7.3 was already specified in 5.4 Packaging of RCP 1 -1969 as follows;

“5.4 PACKAGING

Packaging design and materials should provide **adequate protection** for products to minimize contamination, **prevent damage**, and accommodate proper labelling. Packaging materials or gases where used must be non-toxic and not pose a threat to the **safety and suitability of food under the specified conditions of storage and use**. Where appropriate, reusable packaging should be suitably durable, easy to clean and, where necessary, disinfect.” Consequently, this section is not necessary for setting in this standard.

The first paragraph of Section 7.2 should be deleted as follow:

~~“Laver products shall be packaged in a manner to protect and maintain hygienic, nutritional and quality attributes of the products to the extent reasonably practical. In addition, the products shall be packaged to protect them from moisture.”~~

8. LABELLING

8.1 The Name of the Product

This section was already specified in Section 4.1 of CODEX STAN 1-1985. Thus it should be deleted as follow:

~~“8.1 The Name of the Product~~

~~The name of the products shall be in line with Section 2.3. Other appropriate names can be labelled in accordance with the law and custom in the country where the products are distributed.”~~

PROPOSED DRAFT REGIONAL STANDARD FOR LAVER PRODUCTS

INTRODUCTION

“Street-vended foods” or its equivalent “street foods” are defined as foods and beverages prepared and/or sold by vendors in streets and other public places for immediate consumption or consumption at a later time¹. Rapid urbanization and population growth, ~~especially in the developing countries~~, are expected to continue and street-vended foods, which are largely but not exclusively an urban phenomenon, will expand accordingly.”

Rationale: The introduction should be kept general and not to mention any country in particular.

SECTION 2 – SCOPE,USAGE AND DEFINITION

SECTION 2.3 DEFINITION

We suggest the definitions should be rearranged in alphabetical order.

We are of the opinion that the definition should be aligned with the Procedure Manual of Codex and General Principles of Food Hygiene (CAC-RCP 1-1969) such as the definition for Food Handler.

We would like delete any definition that does not appear in any place of the document such as water container, sealed container, and impermeable.

SECTION 5 LOCATION, DESIGN, STRUCTURE AND APPLIANCES

Recently, automatic vending machine for food is important, so we would like to seek clarification whether this guideline covers the automatic vending machine.

We propose additional requirement for the cooking ranges in Section 5.1 as follows:

“All cooking ranges, washing equipment, working tables, shelves and cupboards on or in which food is placed should have an appropriate height above the ground to prevent contamination”

Rationale: this is a critical point that otherwise contamination may occur.

SECTION 6 MAINTENANCE AND SANITATION

Thailand would like to amend the name of section 6.2 to “Cleaning”

To be in line with RCP 1, water supply should be clearly separated according its purpose of use, i.e. for consumption and for other application.

In our opinion, water for cleaning should be under the section of cleaning whereas water for consumption should be under section 8.1 (Raw material).

SECTION 7 EQUIPMENT AND APPLIANCES

This section should be placed under Section 5 Location, Design, Structure and Appliance so that it is in line with RCP 1.

SECTION 8 FOOD PREPARATION, HANDLING, DISPLAY AND STORAGE

- Paragraph 37

“All raw materials and ingredients should conform to accepted international standards or national standards.”

Rationale: for better clarification what accepted standards refer to

- Paragraph 38

Ice to be used in beverage and food should be prepared from potable water

“Ice to be used for storage that does not contact directly to food should be made of clean water.”

Rationale: Ice should be separated according to its purpose, similarly to water supply. Some street vendors use ice for refrigeration, which does not directly contact to food therefore it is acceptable to use clean water. However for ice that is to be consumed it should be made of potable water to ensure its safety.

- Paragraph 50

“Cooked food should be kept in a ~~safe~~ place- that is hygienic and able to prevent contamination”

Rationale: This amended sentence is clearly take into account food safety.

8.3 Handling and Storage

The order of the requirements under this section should be rearranged into groups according to their matters, such as raw material, packaging and utensil.

Thailand requests to add the requirement on “transportation of cooked food” to prevent cross-contamination.

- Paragraph 55

“Take-away food should be wrapped in clean and suitable packaging that can prevent contamination ~~food grade, plastic or paper~~”

Rationale: In opinion we cannot focus the plastic and paper as they are too specific. Moreover, we would like to seek clarification, who are the inspection body or what are the methods of testing of food grade packaging.