

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CL 2025/63 CAC
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TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for comments on the proposal for the amendment of the common names of the predominant ingredient in the *Standard for kimchi (CXS 223-2001)*

DEADLINE: 6 October 2025

BACKGROUND

1. In response to the request from CAC47 ([REP24/CAC](#) paragraph 264), the Republic of Korea has submitted a proposal (discussion paper and project document) to amend the *Standard for kimchi (CXS 223-2001)*. The standard was developed by the Codex Committee on Processed Fruits and Vegetables (CCPFV), which was adjourned *sine die* by CAC43 (2020).
2. The proposal from the Republic of Korea concerns the addition of commonly used names for the predominant ingredient of kimchi such as “napa cabbage” and “kimchi cabbage” in addition to “Chinese cabbage.”. The rationale for this proposed amendment is to align with current terminology in trade and scientific literature, and to ensure consistency with the revised *Classification of Foods and Animal Feeds (CXA 4-1989)* as adopted by CAC40 (2017), under which kimchi cabbage and napa cabbage are classified within the same commodity code (VB 0467) as Chinese cabbage.
3. Following CAC47, the Codex Secretariat clarified that in line with the [Codex Procedural Manual](#), Section 2, Elaboration of Codex standards and related texts, paragraph 32, this proposal is appropriately considered an amendment. Accordingly, the documents have been restructured in the form of a working paper, setting out the rationale for the proposed amendment together with the proposed wording, as appropriate (see Figure 1 of Appendix I).

REQUEST FOR COMMENTS

4. Codex Members and Observers are invited to provide comments on the need for and suitability of the proposed amendment.

GUIDANCE ON THE PROVISION OF COMMENTS

5. Comments should be submitted through the Codex Contact Points of Codex Members and Observers using the OCS.
6. Contact Points of Codex Members and Observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.
7. Contact Points of Codex Members and Observer organizations are requested to provide general comments at the document level. Additional guidance on the OCS comment categories and types can be found in the [OCS Frequently Asked Questions \(FAQs\)](#).
8. Other OCS resources, including the user manual and short guide, can be found at the following link: <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>.
9. For questions on the OCS, please contact Codex-OCS@fao.org.

**PROPOSAL FOR AMENDMENT OF THE COMMON NAMES FOR
THE PREDOMINANT INGREDIENT IN THE STANDARD FOR KIMCHI (CXS 223-2001)**

(Prepared by the Republic of Korea)

Background

1. In 2020, the Republic of Korea submitted a proposal for the revision of the *Standard for kimchi* (CXS 223-2001) to the Codex Secretariat, which included an amendment to the nomenclature of the main ingredient in various sections.
2. Since CXS 223-2001 is under the purview of the Codex Committee on Processed Fruits and Vegetables (CCPFV), which was adjourned *sine die* by CAC43 (2020), the proposal was presented to CCEXEC81 (2021). CCEXEC81 noted that as CCPFV was adjourned *sine die*, a Circular Letter (CL) would be issued requesting the views of Members and Observers on the new work proposal, which would then feed into a critical review by CCEXEC83¹.
3. CCEXEC83 (2022) recommended that the Republic of Korea collect more information on food safety or quality issues for certain sections, and CAC45 (2022) requested the Republic of Korea to submit a revised proposal, taking into account the recommendation of CCEXEC83².
4. In 2024, considering that CCPFV was adjourned *sine die*, the Republic of Korea submitted a proposal to the Codex Secretariat with priority for the amendment of the nomenclature of the main ingredient in kimchi, which can be considered by the Commission instead of CCPFV. CCEXEC87 (2024) recommended the issuance of a CL to seek the views of Members and Observers on the need to amend the standard and the suitability of the proposed amendment³.
5. At CAC47 (2024), the Republic of Korea submitted a proposal as a conference room document (CRD)⁴. Members noted that it was not clear if the proposed amendment was editorial or substantive in nature and therefore it required further consideration. A Member suggested discussing this issue at the next session of CCASIA as a means of further informing CAC on the nature of the amendment. However, since CXS 223-2001 is an international standard, CAC47 considered that the issuance of a CL, as recommended by CCEXEC87, would be a more suitable approach.
6. CAC47 requested the Republic of Korea to submit a new work proposal to the Codex Secretariat, who would subsequently issue a CL to seek comments from Members and Observers on the need for and suitability of the proposed amendment⁵. Following CAC47, the Codex Secretariat clarified that in line with the *Procedural Manual*, Section 2, Elaboration of Codex standards and related texts, paragraph 32, the proposal would take the form of a working paper with the reasons for and wording of the proposed amendments as appropriate.
7. Accordingly, this document constitutes the working paper for CAC48's consideration.

Introduction

8. In the current *Standard for kimchi* (CXS 223-2001) adopted in 2001, only "Chinese cabbage" is specified as the common name for the predominant ingredient of kimchi. The purpose of the proposed amendment is to reflect other common names used for the predominant ingredient of kimchi, namely "napa cabbage" and "kimchi cabbage" in addition to "Chinese Cabbage" in *the Standard for kimchi* (CXS 223-2001).
9. In the revised *Classification of foods and animal feeds* (CXA 4-1989), "kimchi cabbage" and "napa cabbage" are classified within the same commodity code (VB 0467) as "Chinese cabbage". "Kimchi cabbage" and "napa cabbage" are also widely used terms in international trade and in academic studies. It is also noted that CXA 4-1989 refers to *Brassica rapa* L. subsp. *pekinensis* (Lour.) Hanelt for all Chinese cabbages.
10. The proposed amendment is aligned with CXA 4-1989 and shown in bold and underline in Figure 1.

¹ [REP21/EXEC2](#) paragraph 61

² [REP22/EXEC2](#) paragraph 51, [REP22/CAC](#) paragraph 158

³ [REP24/EXEC2](#) paragraph 85(ii)

⁴ [CAC47/CRD34](#)

⁵ [REP24/CAC](#) paragraphs 263-264

Figure 1. Proposed amendment to the Standard for kimchi (CXS 223-2001)

<p>1. SCOPE</p> <p>This standard applies to the product known as kimchi, as defined in Section 2 below, which is prepared with Chinese cabbages as a predominant ingredient and other vegetables which have been trimmed, cut, salted and seasoned before fermentation.</p> <p>2. DESCRIPTION</p> <p>2.1 Product definition</p> <p>Kimchi is the product:</p> <p>(a) prepared from varieties of Chinese cabbage, <i>Brassica rapa L. subsp. pekinensis</i> Rupr (Lour.) Hanelt, with common names including Chinese cabbage, kimchi cabbage and napa cabbage; such Chinese cabbages shall be free from significant defects, and trimmed to remove inedible parts, salted, washed with fresh water, and drained to remove excess water; they may or may not be cut into suitable sized pieces/parts;</p>
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Necessity to amend the standard

- The Republic of Korea is of the view that reflecting other common names, namely "napa cabbage" and "kimchi cabbage", as the main ingredient of kimchi in CXS 223-2001 is needed to address international trade practices and reflect the terminology now commonly used in academic studies on kimchi that have evolved since the adoption of CXS 223-2001 in 2001. The proposed amendment would also ensure consistency with the terminology used in the revised CXA 4-1989 as adopted in 2017.
- According to our investigations, the majority of kimchi products exported from the Republic of Korea are labelled with "napa cabbage" as the common name of the main ingredient. In addition, "kimchi cabbage" is widely used in the scientific community. Thousands of academic studies have also shown that "kimchi cabbage" is the common name for the main ingredient of kimchi (see Table 1). These indicate that, in addition to "Chinese cabbage", other common names are widely used for the main ingredient of kimchi. Considering the growth in the use of the terms "napa cabbage" and "kimchi cabbage" in international trade and the scientific community, it is expected that this growth will continue.

Table 1. Number of scientific articles using the term "kimchi cabbage"

Year	2001-2018	2019	2020	2021	2022	2023	2024
Number of scientific articles	731	185	166	254	239	248	413

Source: Google scholar

- Since the adoption of CXS 223-2001, kimchi exports from the Republic of Korea, both in volume and value, have steadily increased regionally and internationally (see Table 2 and 3). In 2024, the export value reached around 164 million USD with an export volume of 47,052 tons. Furthermore, kimchi was exported to over 80 countries (see Table 4).

Table 2. Total export volume and value of kimchi from the Republic of Korea

Unit : Ton / 1000USD	2019	2020	2021	2022	2023	2024
Volume	29,628	39,748	42,544	41,118	44,037	47,052
Value	104,992	144,511	159,915	140,816	155,598	163,571

Source: Korea Agricultural Trade Information

Table 3. Kimchi export volume and value from the Republic of Korea to major importing countries

Unit : Ton / 1000USD	2019	2020	2021	2022	2023	2024	
Japan	Volume	15,949	20,101	21,376	19,800	20,173	18,383

	Value	55,184	71,099	80,124	60,996	61,491	54,023
USA	Volume	3,725	6,191	7,950	8,569	10,660	13,336
	Value	14,802	23,059	28,254	29,098	39,989	47,960
Netherlands	Volume	902	1,302	1,378	1,574	1,756	2,264
	Value	3,398	5,147	5,448	6,429	7,380	9,587
Australia	Volume	1,105	1,707	1,504	1,638	1,616	2,217
	Value	3,485	5,641	5,125	5,883	5,990	7,682
Canada	Volume	642	894	841	1,036	1,368	2,210
	Value	2,299	3,307	3,044	3,702	5,463	8,336
UK	Volume	886	894	1,224	1,286	1,539	1,749
	Value	3,322	3,802	5,501	5,309	6,152	7,285
China	Volume	2,862	3,857	3,960	3,398	2,925	2,691
	Value	9,734	13,627	14,631	12,760	11,333	10,051
Singapore	Volume	631	1,122	989	900	746	706
	Value	2,252	4,030	3,723	3,193	2,992	2,632
Malaysia	Volume	426	563	562	519	433	447
	Value	1,577	2,254	2,342	2,188	1,925	1,822

Source: Korea Agricultural Trade Information

Table 4. Number of kimchi trading countries of the Republic of Korea by year

Year	2019	2020	2021	2022	2023	2024
Number of countries	80	81	80	84	92	86

Source: Korea Agricultural Trade Information

Alignment with the revised *Classification of foods and animal feeds CXA 4-1989*

14. The Republic of Korea notes that according to CXA 4-1989 as revised by CAC40 (2017), “napa cabbage” and “kimchi cabbage” are classified within the same commodity code (VB 0467) as “Chinese cabbage”, with the scientific name, *Brassica rapa* L. subsp. *pekinensis* (Lour.) Hanelt, which is the main ingredient of kimchi.
15. Consistency between Codex standards and related texts is one of the principles of Codex. Thus, besides reflecting current trade practices, the proposed amendment as presented in Figure 1 would also ensure consistency between CXS 223-2001 and the relevant section of CXA 4-1989 (see Table 5), which was revised by CAC.

Relevance to the Codex strategic objectives

16. The proposed amendment is in line with objective 1.4 and 4.1 presented in the Codex Strategic Plan 2021 – 2026.
 - Objective 1.4 Codex standards and related texts are developed, reviewed and adopted in a timely, transparent and inclusive manner.
 - Objective 4.1 The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.

**Table 5. Comparison of the relevant section in the previous and revised (after CAC40 (2017))
Classification of foods and animal feeds (CXA 4-1989)**

Previous Classification of foods and animal feeds (before CAC40)		Revised Classification of foods and animal feeds (after CAC40)	
Group 013 Leafy vegetables (including Brassica leafy vegetables)		Group 10 Brassica vegetables (except Brassica leafy vegetables) Subgroup 10B Head Brassicas	
VL 0467	<p>Chinese cabbage, (type Pe-tsai)</p> <p><i>Brassica pekinensis</i> (Lour.) Ruprecht</p> <p>Syn: <i>B. campestris</i> L., ssp <i>pekinensis</i> (Lour.) Olson</p>	VB 0467	<p>Chinese cabbage, (type Pe-tsai)</p> <p><i>Brassica rapa</i> L. subsp. <i>pekinensis</i> (Lour.) Hanelt</p> <p>Syn: <i>B. pekinensis</i> (Lour.) Rupr.</p> <p>Chinese cabbage (napa), see Chinese cabbage, (type Pe-tsai), VB 0467</p> <p>Kimchi cabbage, see Chinese cabbage (type Pe-tsai), VB 0467</p> <p><i>Brassica rapa</i> L. subsp. <i>pekinensis</i> (Lour.) Hanelt</p> <p>Syn: <i>Brassica rapa</i> L. var. <i>glabra</i> Regel</p> <p>Napa cabbage, see Chinese cabbage (type Pe-tsai), VB 0467</p> <p>Pak-tsai, see Chinese cabbage, (type Pe-tsai), VB 0467</p>

Conclusion

17. The Republic of Korea proposes an amendment to the common names of the predominant ingredient in the *Standard for kimchi* (CXS 223-2001) to better reflect the common names used to describe the predominant ingredient of kimchi in international trade practices as well as in academic studies, noting that the evolvement since the adoption of the standard in 2001.
18. The proposed amendment would also be in line with the revised *Classification of foods and animal feeds* (CXA 4-1989), which recognizes both “kimchi cabbage” and “napa cabbage” as common names in the same category as Chinese cabbage.
19. The proposed amendment to CXS 223-2001 is to reflect other common names for *Brassica rapa* L. subsp. *pekinensis* (Lour.) Hanelt, which is the predominant ingredient of kimchi. This is needed to reflect terminology used in international trade and to ensure consistency with the CXA 4-1989 as revised in 2017.