CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items: 2,3,4 **CRD 6**

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

28th Session
Washington DC, United States of America,
12 – 16 September 2016

COMMENTS SUBMITTED BY:

INDIA

Agenda Item 2

Specific Comments:

1. Para 12: Use of "emulsifier, stabilizer, thickener" and "xanthan gum" (INS 415)

India supports the use of "emulsifier, stabilizer, thickener" in general and xanthan gum (INS 415) in food categories 14.1.2 "Fruit and vegetable juices" and 14.1.3 "Fruit and vegetable nectars" in general and in specific sub-categories with following technical justifications:

Emulsifiers and Stabilizers (like Pectin, Carboxyl Methyl Cellulose, Gellan Gum, Carrageenan, Alginates) are used in juices and beverages to:

- For suspension of cells, peel and pulp particles to further enhance taste experience.
- Avoid separation/sedimentation.
- Enhance mouth feel which in turn improves taste profile.
- Get homogeneous consistency as per consumer's requirements.

Xanthan gum provides i) Resistance to Enzymatic degradation; ii) Excellent stability of viscosity over a wide pH range; iii) Excellent stability of viscosity over a temperature range; and, iv) High viscosity at low shear rate. Therefore, it must be allowed in 14.1.2 "Fruit and vegetable juices" and 14.1.3 "Fruit and vegetable nectars" where natural enzymes, varying pH, varying temperature and processing conditions are involved predominately.

2. Para 13: Technological justification on the use of food additives

a) 04.1.2 "Processed fruit" of:

India supports the use of antioxidants in processed fruit in general and the use of Tocopherols (INS 307a, b, c), specifically to be added in standardized and non-standardized foods for all subcategories with following technical justifications:

1. Auto-oxidation is very predominant in case of fruits and vegetables since they are rich in carbohydrates, phenolic compounds and rich in color and flavour. Auto-oxidation proceeds through free radical mechanism as various processing of fruits like, heating, canning, Freezing may cause auto-oxidation process to speed up. Auto-oxidation leads to rancidity, off flavour & off taste, browning reaction, loss of volatile compounds.
2. The molecular mechanism of tocopherol which plays a role in a variety of physiological and biochemical functions is probably mediated either by the antioxidant function or its membrane stabilizing effect.

b) 04.1.2.2 "Dried fruit" of:

India supports the use of Tartrates (INS 334, 335 (ii), 337) specifically, in products conforming to CODEX STAN 177-1991 with following technical justifications:

1. Tartaric acid act as an antioxidant and acidity regulator. It controls the oxidation (which leads to pH fall) and at the same time maintain the acidity by regulating the pH of Coconut.

c) 04.1.2.3 "Fruit in vinegar, oil or brine" of:

India supports the use of Tartrates (INS 334, 335 (ii), 337) as acidity regulators to be included in products conforming to CODEX STAN 260-2011 (STANDARD FOR PICKLED FRUITS AND VEGETABLES) with following technical justifications:

1. Tartaric acid plays an important role chemically, lowering the pH of fermenting (in case of Fruit in Brine) to a level where many undesirable spoilage bacteria cannot live, and acting as a preservative after fermentation.
2. Oil (one of the optional ingredients in pickled fruits and vegetables) is highly susceptible to Auto-oxidation which may cause rancidity and formation of FFA at the same time which may lead to sourness of the product. Tartrates function as antioxidants as well as acidity regulators can prevent these defects in the products.
3. In case of Fruit in Oil and Brine, Oxidation can cause loss of Color and Flavour of the Product which Tartrates are very well able to control being multi-functional as Acidity Regulators, Antioxidants, and Sequestrant.

e) 04.1.2.6 "Fruit based spreads (e.g. chutney) excluding products of food category 04.1.2.5" of:

India supports the inclusion of Tartrates(INS 334, 335 (ii), 337) as acidity regulator in products conforming to CODEX STAN 160-1987, with following technical justifications:

1. Mango is generally rich in vitamins & minerals like calcium, iron, Vitamin C, Vitamin B complex, these nutrients are highly susceptible to temperature and Oxidation, Tartrates can provide better shield as it can behave as acidity regulator, antioxidant as well as sequestrant simultaneously.

Agenda Item 3

Specific Comments

1. Para1.3 Types of Pack

India proposes that Other styles of pineapple also to be included in heavy pack.

1.3.2. Heavy pack: "Tidbits" or "diced or cubes" or "pieces" or "chips" or "crushed" "chunks" or "spears or fingers"styles containing at least 73% drained fruit weight.

Rationale

Chunks and spears are not classified under any type of packs. Canned pineapple available in market can also be chunks and spears. Hence, Chunks and Spears also to be included in heavy pack to reflect current trade practices.

2. Para 2.2.2.1 Cored pineapples clause (f) Cubes or diced

India supports option 2 with following underlined changes:

~~No~~Not more than 15% of the drained weight of pineapple in the container may consist of cubes or diced, each of which shall weigh less than three-fourths of the average weight of cubes or diced.

Rationale:

Typographical error – "no" to be replaced with "not".

Option 2 to be considered since this one requirement will ensure both the quantities and size of the retentate.

3. Para 3:FOOD ADDITIVES

India supports option 1 with following changes to be included:

In addition to Section 4.1 and 4.2 of Codex STAN 319-2015, the following food additive classes listed below are technologically justified and may be used in canned pineapples.

3.1 Antifoaming agents and sweeteners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in Food Category 04.1.2.4 (Canned or bottled (pasteurized) fruit) or listed in Table 3 of the General Standard are acceptable for use for foods conforming to this Annex.

3.2 Flavourings used in products covered by this Annex shall comply with the Guidelines for the Use of Flavourings (CAC/GL 66-2008).

Rationale:

From option 1, the provision of all acidity regulators, antifoaming agents and sweeteners can be allowed from GMP table.

Agenda Item 4
General Comments: India appreciates the work done by the EWG.

Issue 1: "Other Styles":- India supports the inclusion of "Other Style" under the section- "Presentation" in all annexes mentioning the reference to the Section 2.4 Styles of the general provisions.

Rationale: The inclusion of "other style" in all annexes will make the document more clear, transparent and comprehensive.

Specific Comments

ANNEX I: BROCCOLI

1. Para 2.3: DEFINITION OF "DEFECTIVES"

India proposes following underlined changes in Section 2.3 DEFINITION OF "DEFECTIVES":

Any standard sample unit, which fails to comply with the quality requirements, as set out in Sections 1.2.1, ~~2.1.1~~ 2.2.1and ~~2.1.4~~ 2.2.4 shall be regarded as a "defective".

Rationale:

Typographical error.
2.1.1 Describes basic ingredients whereas 2.1.4 is nowhere to refer.

ANNEX III: CAULIFLOWER

1. Para 2.3: CLASSIFICATION OF "DEFECTIVES"

India proposes following underlined changes in Section 2.3 DEFINITION OF "DEFECTIVES":

Any standard sample unit, which fails to comply with the quality requirements, as set out in Sections ~~2.1.1~~ 2.2.1and ~~2.1.4~~ 2.2.4 shall be regarded as a "defective".

Rationale:

Typographical error.
2.1.1 Describes basic ingredients whereas 2.1.4 is nowhere to refer.

ANNEX IV: QUICK FROZEN FRENCH FRIED POTATOES

1. Para 3.2: FOOD ADDITIVES

1.1 India supports inclusion of food additive provisions mentioned in Section 3.2.

1.2 India proposes the limits of Phosphates to be permitted at 5000 ppm.

Rationale:

The CODEX STAN 192-1995 on food additives permits this level. This new limit was already captured in a previous version of the standard but we've noted that it has changed back to 100 ppm which is not technically feasible.

1.3 India supports the inclusion of coloring agents

Rationale: The use of coloring agents helps colour formation and reduces the formation of Acrylamide. We understand that coloring agents may not be permitted in all countries. Therefore, we suggest that its permitted use is based on the local regulatory provisions, similar to many additives that have such considerations under the Codex Standard of Food Additives. This is an important provision to permit manufacturers mitigate the risk of Acrylamide formation and ensuring uniform colour development without extended cooking.

ANNEXVII: SPINACH

Specific Comments

1. Para 2.3: CLASSIFICATION OF "DEFECTIVES"

India proposes following underlined changes to be incorporated in Section 2.3 DEFINITION OF "DEFECTIVES":

Any standard sample unit, which fails to comply with the quality requirements, as set out in Sections ~~2.1.1~~ 2.2.1, ~~2.1.2~~2.2.2 and 2.1.6 shall be regarded as a "defective".

Rationale:
Typographical error. 2.1.1 Describes basic ingredients and 2.1.2. describes optional ingredients