

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda item 5.2

CX/MAS 25/44/7 Add.1

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

Forty-fourth Session

Virtual

5 – 8 May and 14 May 2025

### REVIEW OF METHODS OF ANALYSIS IN CXS 234 - COCOA PRODUCTS AND CHOCOLATE WORKABLE PACKAGE (Comments in reply to CL 2025/17–MAS)

*submitted by*

*Australia, Egypt, Ghana, Iran (Islamic Republic of), Iraq, Peru, Thailand, United Kingdom  
and European Cocoa Association, ICUMSA, International Confectionery Association*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/17-MAS issued in March 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 appendix

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

## ANNEX

GENERAL COMMENTS	MEMBER / OBSERVER
We provide only minor editorial amendments in the following 'specific comments' and support the proposal to revise CXS 87-1981, part 6.8.2 'Quantitative Determination of Non-Cocoa Butter Vegetable Fats,' with the provisions 'Cocoa butter equivalents in cocoa butter and plain chocolates' using method 'ISO 23275-1 and ISO 23275-2:2006 / AOCS Ce 11-05' and 'Cocoa Butter Equivalents in Milk Chocolate' by 'ISO 11053:2009 / AOCS Ce 11a-07'.	<b>Australia</b>
Egypt appreciates the efforts made in preparing this proposal and would like to thank everyone involved in its development. We would like to refer to the proposal outlined in the document after reviewing the details provided. We fully support the proposal and its objectives. After reviewing the proposal to revise section 6.8.2 of the Standard for Chocolate and Chocolate Products (CXS 87-1981) as presented in Appendix II of CX/MAS 25/44/7, we hereby express our full support for the proposed revisions.	<b>Egypt</b>
1. Ghana endorses the proposed changes to CXS 234-1999, as presented in Appendix I. 2. Ghana supports the suggestion to revise CXS 87-1981, part 6.8.2, 'Qualitative Determination of Non-cocoa butter vegetable fats' with the provisions 'Cocoa butter equivalents in Cocoa butter and plain Chocolates' and 'Cocoa butter equivalents in milk chocolate' as presented in Appendix II, because it makes it clearer.	<b>Ghana</b>
Agree with Appendix I proposed changes and no comments about section 6.8.2 in Appendix II of CX/MAS 25/44/7	<b>Iraq</b>
In principle, we have no objection with the proposed methods for cocoa products and chocolate with changes to CXS 234-1999 as presented in Appendix I.	<b>Thailand</b>
We would like to propose the addition of the following method (see comment on Annex II): Commodity: "Cocoa powders (cocoa) and dry cocoa-sugar mixtures" / "Cocoa (cacao) mass or cocoa/ chocolate liquor, and cocoa cake" Provision: Cocoa Butter / Fat Method: ICA No. 37 Principle: Gravimetry (Soxhlet extraction) Type: I Standard: CXS 105-1981 / CXS 141-1983 Committee: CCCPC Rationale: As Provision "Cocoa Butter" has been mentioned in CXS 105-1981, there should be a method as well. We also suggest creating Guidelines for the application of near infrared spectrometry in cocoa and chocolate products.	<b>European Cocoa Association</b>
The changes are clear and appropriate.	<b>ICUMSA</b>
The International Confectionery Association would like to express its appreciation to the eWG for the work carried out so far and for the opportunity to provide feedback on the ongoing review. We recognize the importance of ensuring that the methods under consideration are reviewed thoroughly and consistently. However, it seems that the process of assigning each method to at least two eWG members for independent review may not have been systematically implemented. As a result, we believe that some methods may not have received the level of scrutiny and expert input that such evaluations require. In addition, several methods appear to need more time for a proper and comprehensive review, particularly to allow for meaningful	<b>International Confectionery Association</b>

GENERAL COMMENTS	MEMBER / OBSERVER
<p>discussion and consensus-building among experts. Given the technical nature of the work and the implications of the decisions being made, we strongly believe that it is essential to allow sufficient time and structure to support a robust and transparent process. We therefore respectfully request:</p> <ol style="list-style-type: none"><li>1. Additional time for members to complete the review of the methods, especially those that have not yet been assessed in depth.</li><li>2. A clearer structure or guidance on how the review process is to be conducted, including the allocation of methods to reviewers and the expectations regarding the depth and format of feedback.</li></ol> <p>We remain committed to supporting the work of the eWG and to contributing constructively to the review. We believe that ensuring a well-organised, inclusive, and transparent process will be in the best interest of all stakeholders involved.</p> <p>Methods for proximate analyses (e.g. moisture) tend to be of considerable age and were developed by SDOs to meet the needs of industry at the time of development. Nonetheless, most of the methods have received positive reviews from the experts. Many of the reviewed methods are in use globally and are the subject of regular proficiency testing. - ICA supports, these methods have been in use for a long time and still are relevant</p>	

SPECIFIC COMMENTS					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Cocoa butter	<u>ICA No. 26 / AOAC 977.10</u> and AOAC 963.15 / <u>ICA No.14</u> IOCCC 14	<u>Calculation from moisture (Determined as Water) and</u> Gravimetry (Soxhlet extraction)	I	<u>CXS 87-1981</u>	<u>CCCPC</u>
Oven evaporation and factor <u>Calculation from moisture (Determined as Water) and</u> Water Content					Iran (Islamic Republic of)	
Cocoa butter  4. Provisions where the measurement results are based on calculation from moisture content We observe that regarding moisture the EWG decided to retain the loss upon drying method as Type I and propose the Karl Fischer method as Type II for the moisture provision. Meanwhile, the Karl Fischer method was proposed as Type I for the provisions where measurement results are based on calculations from moisture content (Determined as Water) and the dry weight of the sample, such as cocoa butter and fat-free milk solids. Thus, we would like to request for clarification on this matter.					Thailand	
Cocoa butter  Keep consistency of provisions. For this provision suggest 'Cocoa butter (determined as fat)'.					United Kingdom	
<u>ICA No. 26 / AOAC 977.10</u> and AOAC 963.15 / <u>ICA No.14</u>  We do not agree with the proposed change. Cocoa butter content reported on as-is not on dry-base. Therefore no moisture method is required.  <u>ICA No. 26 / AOAC 977.10 and</u> AOAC 931.05 <u>and AOAC 930.20</u>  Difficult to get reliable results on this method. Methods are not actively used. In addition: AOAC method 931.05 is only for cocoa liquor; AOAC method 930.20 is used to determine crude fiber in cacao products therefore it is not relevant here.					European Cocoa Association	
<u>ICA No. 26 / AOAC 977.10</u> and AOAC 963.15 / <u>ICA No.14</u>  ICA supports changing the name from IOCCC to ICA. This applies to all IOCCC methods					International Confectionery Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Fat-free cocoa solids	<u>ICA No. 26 / AOAC 977.10 and AOAC 931.05 and AOAC 930.20</u>	<del>Oven evaporation and factor</del> <u>Calculation from moisture (Determined as Water) and gravimetry (ether, alcohol and aqueous extraction)</u>	I	<u>CXS 87-1981</u>	<u>CCCPC</u>
Chocolate and chocolate products					Australia	
Chocolate and chocolate products, for 'Fat-free milk solids (Determined as Milk Protein)' has been retained as Type II instead of changing to Type I. To derive the 'Total casein and albumin' there is a nitrogen to protein factor, and then conversion to 'total milk protein' also requiring a factor. So, amendment of method Type II to Type I required.						
<u>ICA No. 26 and ICA No.17 and ICA method No.13 or / AOAC 977.10 and AOAC 955.04C and <del>AOAC 939.02</del></u>					European Cocoa Association	
Obsolete/outdated method.						
Fat-free milk solids <u>(Determined as Milk Protein)</u>					International Confectionery Association	
ICA supports observations from the eWG (determining only protein cannot provide accurate measurement of fat-free milk solids in cocoa and chocolate products. Those methods may require further work and suggestions). At a minimum, lactose determination should be included.						
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Fat-free milk solids <u>(Determined as Milk Protein)</u>	<u>ICA No. 26 and ICA No.17 and ICA method No.13 or / AOAC 977.10 and AOAC 955.04C and <del>AOAC 939.02</del></u>	<del>Titrimetry, Kjeldahl digestion; after extraction of milk proteins</del> <u>Calculation from moisture content, and Titrimetry (Kjeldahl N) content of extracted and precipitated milk protein.</u>	II	<u>CXS 87-1981</u>	<u>CCCPC</u>
Chocolate and chocolate products					Australia	
Chocolate and chocolate products, for 'Fat, total on dry basis' – is stated as "ICA No. 26 / AOAC 977.10 and AOAC 963.15". We recommend amendment to 'ICA No. 26 / AOAC 977.10 and AOAC 963.15 / ICA No.14', as we believe AOAC 963.16 and ICA No.14 are identical, so the ICA No.14 should be retained.						
AOAC 963.15					United Kingdom	
Should ICA no.14 be included as an identical method to AOAC 963.15						
<u>ICA No. 26 / AOAC 977.10 and</u>					European Cocoa Association	
We do not agree with the proposed change.						

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Fat, total <u>on dry basis</u>	<u>ICA No. 26 / AOAC 977.10 and</u> AOAC 963.15	<u>Calculation from moisture (Determined as Water) and</u> Gravimetry (Soxhlet extraction)	I	<u>CXS 87-1981</u>	<u>CCCPC</u>
<b><u>Cocoa butter (Determined as Fat)</u></b> Chocolate and chocolate products, 'Cocoa butter (Determined as Fat) on dry basis' – is stated as "ICA No. 26 / AOAC 977.10 and AOAC 963.15". We recommend amendment to 'ICA No.26 / AOAC 977.10 and AOAC 963.15 / ICA No.14', as we believe AOAC 963.16 and ICA No.14 are identical, so the ICA No.14 should be retained.					Australia	
<b><u>CCCPC</u></b> De acuerdo con la propuesta					Peru	
<b><u>AOAC 963.15</u></b> Should ICA no.14 be included as an identical standard to AOAC 963.15					United Kingdom	
<b><u>ICA No. 26 / AOAC 977.10 and</u></b> We do not agree with the proposed change.					European Cocoa Association	
Commodity	Provision	Method	Principle	Type	Standard	Committee
<u>Chocolate and chocolate products</u>	<u>Cocoa butter (Determined as Fat)</u>	<u>ICA No. 26 / AOAC 977.10 and</u> <u>AOAC 963.15</u>	<u>Calculation from moisture (Determined as Water) and</u> <u>Gravimetry (Soxhlet extraction)</u>	I	<u>CXS 87-1981</u>	<u>CCCPC</u>
<b><u>CCCPC</u></b> De acuerdo con la propuesta					Peru	
<b><u>ICA No. 5</u></b> Obsolete/outdated method. Difficult to get reliable results on this method. High measurement uncertainty. We propose to remove the method and remove the specifications in CXS 87-1981.					European Cocoa Association	
+ ICA supports the proposed change to Type IV. There are challenges with the method in that the fatty acid composition of dairy (including volatile fatty acids) is highly variable depending on, among other factors, region and time of year dairy fat is sourced. Recognizing that there is no good alternative method currently available, the hope is some promising methods using triacylglycerol determinations can eventually be published for this purpose.					International Confectionery Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Milk Fat	<u>ICA No. 5</u> <del>IOCCC-5</del> AOAC 945.34; 925.41B; 920.80	Titrimetry/Distillation	+ <u>IV</u>	<u>CXS 87-1981</u>	<u>CCCPC</u>
Moisture 1. The provision “moisture” and proposal to include the provision “Moisture (Determined as Water)” We agree with the EWG to retain the loss upon drying methods as Type I for determination of moisture, and have no objection to the inclusion of the provision “Moisture (Determined as Water)” measured by Karl Fischer method as Type II. However, the inclusion of “Moisture (Determined as Water)” should be considered by Commodity Committee, because TORs of CCMAS does not include consideration for inclusion of provisions to commodity standards <u>ICA No. 41/ AOAC 931.04</u> <del>†I IV-</del>					Thailand	
Moisture Suggest change to 'Moisture (by gravimetry)'					United Kingdom	
Gravimetry- <u>drying at 100-102° C</u> We suggest not to include “drying at 100-102C” in this document as it constitutes irrelevant information. <del>†</del> We disagree with the proposal to change to Type IV method and would rather maintain this as Type I. This is the most common standard method in Europe (over KF), and it is even mentioned as an example of Type I in the document “INF_CCMAS_END_e Comprehensive Guidance CSX 234”					European Cocoa Association	
<u>IV</u> In the table, moisture by gravimetry is being changed to a type IV method. This needs clarification - for other determinations which factor water measurement into the result, Karl Fischer is listed as the reference method. Need to clarify whether gravimetry will be a type I (and recommended for use in conjunction with other determinations) or whether it will be listed as a type IV.					International Confectionery Association	

COMMENT				MEMBER / OBSERVER		
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Moisture	<u>ICA No. 1</u> <del>IOCCC 26</del> or AOAC 977.10 (Karl Fischer method)	Gravimetry- <u>drying at 100-102° C</u>	<del>+</del> <u>IV</u>	<u>CXS 87-1981</u>	<u>CCCPC</u>
<b><u>Titrimetry - Karl Fischer</u></b> Chocolate and chocolate products, 'Moisture (Determined as Water)' the Principle is stated as "Gravimetry Titrimetry - Karl Fischer". We recommend amendment to 'Gravimetry Titrimetry - Karl Fischer. Apart from weighing in the test portion, gravimetry is not part of the determination.				Australia		
<b><u>Gravimetry-</u></b>				Thailand		
<b><u>Gravimetry</u></b> Are gravimetry methods listed? If not, then this term needs to be removed. <b><u>Titrimetry - Karl Fischer</u></b> Should the titrimetry Karl Fisher method be a Type I?				United Kingdom		
<b><u>Moisture (Determined as Water)</u></b> We suggest not including the wording "determined as water" in this document as it constitutes irrelevant information. <b><u>II</u></b> We disagree with the categorisation - ICA-26 / AOAC 977.10 should be a Type III, as the Moisture ICA-01 does apply as defining/reference method.				European Cocoa Association		
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Non-cocoa butter vegetable fat	AOCS Ce 10/02 and described in the standard	<del>Described in the standard</del> <u>Gas chromatography</u>	<del>+</del> <u>IV</u>	<u>CXS 87-1981</u>	<u>CCCPC</u>
<b><u>Gas chromatography</u></b> GC-FID (Gas chromatography with FID detector)				Iran (Islamic Republic of)		
AOCS Ce 10/02 and described in the standard Obsolete/outdated method.				European Cocoa Association		



COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Cocoa (cacao) mass or cocoa/ chocolate liquor, and cocoa cake	Cocoa shell	AOAC 968.10 and 970.23	Spiral vessel count, stone cell count <u>Microscopy - Spiral vessel count</u>	I	<u>CXS 141-1983</u>	<u>CCCPC</u>
Spiral vessel count, stone cell count  We disagree with the spiral vessel count principle, due to the more complex and irregular structures, which make it less distinct compared to other fragments in a sample. Stone cells, both in groups as in isolation, do have a more regular and easier structure to be identified from other fragments.					European Cocoa Association	
Commodity	Provision	Method	Principle	Type	Standard	Committee
<u>Cocoa (cacao) mass or cocoa/ chocolate liquor, and cocoa cake</u>	<u>Cocoa shell</u>	<u>AOAC 970.23</u>	<del>Spiral vessel count, stone cell count</del> <u>Microscopy - Stone cell count</u>	<u>IV</u>	<u>CXS 141-1983</u>	<u>CCCPC</u>
<u>CCCPC</u>  Desacuerdo, se solicita no se retire los métodos de AOAC 945.34; 925.41B; 920.80; Asimismo, sobre el ICA N° 5 "Determination of the semi-micro values" se necesita mayor información para dar la posición.					Peru	
<u>IV</u>  To check whether the two microscopy methods for cocoa shell are equivalent and should therefore both be Type 1?					United Kingdom	
<del>Spiral vessel count, stone cell count</del>  See comment on spiral vessel count above - we recommend maintaining Stone Cell count as the type 1/leading analysis for shell content.					European Cocoa Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Cocoa (cacao) mass or cocoa/chocolate liquor, and cocoa cake	Fat	<u>ICA No. 26 / AOAC 977.10 and</u> AOAC 963.15 / <u>ICA No 10000 14</u>	<u>Calculation from moisture (Determined as Water) and</u> Gravimetry (Soxhlet extraction)	I	<u>CXS 141-1983</u>	<u>CCCPC</u>
<p><del>Fat</del> Fat on dry basis</p> <p>Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake, for 'Fat' we recommend the provision is amended to 'Fat on dry basis'. As the method does have a moisture correction component.</p>					Australia	
<p>Fat</p> <p>Why is Water not listed here?</p> <p><u>ICA No. 26 / AOAC 977.10 and</u></p> <p>We disagree with the proposed change.</p> <p>AOAC 963.15 / <u>ICA No 10000 14</u></p> <p>The moisture method is not relevant here. Fat/Cocoa butter content can be determined by direct soxhlet with higher precision (ICA-37). We recommend adding ICA-37, and making the method applicable for cocoa liquor/mass/cake. ICA-37 is already common and generates less chemical waste.</p> <p>For water content, Karl Fischer titration is good for cocoa mass because it has a low (~1%) water content that makes gravimetric determination less reliable. For cocoa cake, drying at 103 C is more applicable.</p>					European Cocoa Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Cocoa butter	Unsaponifiable matter	ISO 3596 <del>or</del> / ISO 18609 <del>or</del> / AOCS Ca 6b-53	Titrimetry after extraction with diethyl ether	I	<u>CXS 86-1981</u>	<u>CCCPC</u>
<p>Unsaponifiable matter</p> <p>Cocoa butter - for 'Unsaponifiable matter' we recommend the ISO 3596 and AOCS Ca 6b-53 methods are identical and using diethyl ether. While ISO 18609 has extraction by Hexane. Taking into account prior convention for similar provisions, we recommend two line items as below with footnotes as indicated.</p> <p>Method - ISO 3596 / AOCS Ca 6b-53; Principle - Diethyl ether extraction and gravimetry, and correction for free fatty acids(1); Type - I;</p> <p>(1) The correction by titration and colorimetry is only when it is necessary to correct for free fatty acids.</p> <p>Method - ISO 18609(2); Principle - Hexane extraction and gravimetry, and Hexane extraction and gravimetry, and correction for free fatty acids(1); Type IV;</p> <p>(2) Results obtained from ISO 18609 are systematically lower. In case of limitations due to climate or regulations that prohibit the use of diethyl ether, ISO 18609 can be used instead of the Type I method.</p>					Australia	
<p><u>CCCPC</u></p> <p>Debe decir: AOCS Ce 10-02 y se propone modificar en el apartado 6.8.1 de la norma CXS 87-1981</p>					Peru	
<p>Unsaponifiable matter</p> <p>2. Unsaponifiable matter</p> <p>Recalling that CAC previously endorsed ISO 3596 / AOCS Ca 6b-53 as Type I and ISO 18609 as Type IV for unsaponifiable matter in fats and oils product. The endorsement was based on proposal of CCMAS which, among other matters, took into account that ISO 3596 is identical with AOCS Ca 6b-53, while both of them are not identical with ISO 18609. Nevertheless, it appears that the EWG proposed ISO 3596 / ISO 18609 / AOCS Ca 6b-53 as Type I for cocoa and chocolate products as presented in Appendix I.</p> <p>In this regard, we would like to make an observation that the EWG proposal is not consistent with the previous method endorsement for unsaponifiable matter in fats and oils product</p>					Thailand	
<p>ISO 3596 <del>or</del> / ISO 18609 <del>or</del> / AOCS Ca 6b-53</p> <p>Cocoa butter method not aligned with CXS 86. This standard refers to IUPAC (1987) 2.401</p>					European Cocoa Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Cocoa powders (cocoa) and dry cocoa-sugar mixtures	Moisture <b>(Determined as Water)</b>	<del>IOCCC</del> <b>ICA No. 26</b> / AOAC 977.10	<del>Gravimetry</del> <b>Titrimetry - Karl Fischer</b>	I	<b>CXS 105 - 1981</b>	<b>CCCPC</b>
HII					Thailand	
<del>IOCCC</del> <b>ICA No. 26</b> / AOAC 977.10 If ICA-26/AOAC 977.10 is chosen here, it contradicts Type II chosen in Moisture in chocolate and chocolate products. Karl Fisher titration seems excessive for moisture determination of dry cocoa products when the gravimetric method works very well.					European Cocoa Association	

COMMENT					MEMBER / OBSERVER	
Commodity	Provision	Method	Principle	Type	Standard	Committee
Chocolate and chocolate products	Cocoa butter equivalents in cocoa butter and plain chocolate	ISO 23275-1,2:2006 / AOCS Ce 11-05	Gas chromatography	I	CXS 87-1981	CCCPC
<p>ISO 23275-1,2:2006 and ISO 23275-2 / AOCS Ce 11-05</p> <p>The first row as given in Appendix II as 'ISO 23275-1 and ISO 23275-2' is identical to 'AOCS Ce 11-05'</p>					Australia	
<p><b>Cocoa products and chocolate</b></p> <p>We have no objection to revise CXS 87-1981, 6.8.2 "Quantitative Determination of Non-Cocoa Butter Vegetable Fats" with the provisions "Cocoa butter equivalents in cocoa butter and plain chocolates" and "Cocoa Butter Equivalents in Milk Chocolate" as shown in Appendix II.</p> <p>However, the revision should comply with CCMAS endorsement process which changes should be proposed through the relevant Commodity Committee or, if adjourned, directly to the CCMAS for consideration by the WG on methods endorsement.</p>					Thailand	
<p><b>Cocoa products and chocolate</b></p> <p>Suggested addition:</p> <p>Commodity: "Cocoa powders (cocoa) and dry cocoa-sugar mixtures" / "Cocoa (cacao) mass or cocoa/ chocolate liquor, and cocoa cake"</p> <p>Provision: Cocoa Butter / Fat</p> <p>Method: ICA No. 37</p> <p>Principle: Gravimetry (Soxhlet extraction)</p> <p>Type: I</p> <p>Standard: CXS 105-1981 / CXS 141-1983</p> <p>Committee: CCCPC</p> <p>Rationale: As Provision "Cocoa Butter" has been mentioned in CXS 105-1981, there should be a method as well.</p>					European Cocoa Association	
<p>ISO 23275-1,2:2006 / AOCS Ce 11-05</p> <p>it should be noted that for a number of years, the critical reference material (IRMM 801 CB) has not been commercially available. Based on discussion with IRMM, a new reference material was slated to be prepared, however, there is no concrete timeline. The 2025 IRMM catalogue does not list this material. This method cannot be properly executed without this material. It does not change the nature of the method.</p>					International Confectionery Association	