



Organisation des Nations
Unies pour l'alimentation
et l'agriculture



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AUX: Points de contact du Codex
Organisations internationales intéressées

DU: Secrétariat, Commission du Codex Alimentarius,
Programme mixte FAO/OMS sur les normes alimentaires,
00153 Rome, Italie

OBJET: **Demande d'observations à l'étape 3 de la Procédure sur l'Avant-projet de norme du Codex pour le jus de canne à sucre déshydraté non centrifugé**

DATE LIMITE: **31 janvier 2012**

OBSERVATIONS: **À adresser à:** **Avec copie au:**

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GÉNÉRALITÉS

1. La Commission du Codex Alimentarius a approuvé, à sa trente-quatrième session (juillet 2011), l'élaboration d'une norme du Codex pour la *panela* dans le cadre des travaux du Comité du Codex sur les sucres présidé par la Colombie¹. Le Secrétariat du Codex a diffusé l'avant-projet de norme pour la *panela* à l'étape 3 par la lettre circulaire CL 2011/25-CS. Les commentaires reçus sont intégrés dans l'annexe II du présent document, dans leur langue originale.
2. La Commission a rappelé que, à sa trente-quatrième session, l'élaboration d'une Norme pour la *panela* avait été approuvée à titre de nouvelle activité et qu'elle devait être achevée pour sa trente-sixième session en 2013.
3. La délégation colombienne, en tant que Présidente du Comité sur les sucres, a informé la Commission de l'état d'avancement de cette norme. Elle a indiqué que, compte tenu des observations soumises, les principales questions soulevées par l'élaboration de la norme concernaient l'endroit précis où insérer le produit dans la Norme générale du Codex pour les additifs alimentaires (NGAA), pour laquelle il faudrait éventuellement réviser la description de la catégorie d'aliment correspondante, et la définition des caractéristiques physiques et chimiques du produit. La délégation a fait savoir que la norme serait prête pour adoption à l'étape 5/8 d'ici la prochaine session de Commission, conformément au calendrier convenu des travaux.
4. La Commission a noté l'état d'avancement des travaux sur la norme pour la *panela* et attendait avec intérêt l'adoption définitive de cette norme à la prochaine session.²
5. La Colombie, en qualité de pays d'accueil du Comité du Codex sur les sucres, a révisé les observations qui lui avaient été communiquées en réponse à la lettre CL 2011/25-CS et a rédigé un avant-projet de norme révisé, qui figure à l'annexe I de cette lettre circulaire, pour observation à l'étape 3.

NOTES EXPLICATIVES SUR LA RÉVISION EFFECTUÉE

Nom du produit

6. Compte tenu des diverses présentations du produit, il est proposé de remplacer le mot « *panela* » par l'expression « **jus de canne à sucre déshydraté non centrifugé** ». Toutefois, étant donné les risques qu'il y a à faire figurer les différents noms usuels dans une note en bas de page, les membres du Codex seront consultés parallèlement à la remise du présent document, pour confirmer que les noms indiqués correspondent bien à ce qui avait été établi dans l'avant-projet de norme révisé, et ce, afin de faciliter l'application du document au plan international.

¹ REP11/CAC, par. 143-145 et Appendice VI.

² REP12/CAC, par. 166-168.

7. Sont indiqués ci-après, à titre d'information, les noms employés dans certains pays ou régions: *chancaca* (Chili, Équateur et Pérou); *kokuto* (Japon); *gur* ou *jaggery* (Inde); *jaggery* et *khandsari* (Asie du Sud); *panela* (Bolivie, Colombie, Honduras, Nicaragua, Panama, etc.); *papelón* (Venezuela et certains pays d'Amérique centrale); *piloncillo* (Mexique); *rapadura* (Brésil et Cuba); *tapa de dulce*, *dulce granulado* (Costa Rica).

Exigences physiques et chimiques

8. Il convient de préciser, au chapitre des exigences physico-chimiques, que le saccharose, les sucres réducteurs et les minéraux sont, à notre avis, les éléments résultant du processus d'élaboration qui distinguent ce produit. Les valeurs des éléments indiquées sont, quant à elles, établies par l'analyse d'un échantillon national en laboratoire. Cependant, sachant qu'il existe des variables ayant une incidence sur les caractéristiques du produit et dans le souci de parvenir à un consensus, nous saurons gré aux membres de bien vouloir nous communiquer leurs observations spécifiques au sujet des éléments et de leur avantages.

Additifs alimentaires

9. Conformément aux observations formulées dans la section 4 relative aux *Additifs alimentaires* et suivant les indications de la section II du Manuel de procédure, il a été procédé à une révision de la Norme générale pour les additifs alimentaires (Codex Stan 192-1995) afin d'y faire figurer une référence à cette section, puisque le produit objet du projet de norme n'y était pas mentionné.

10. En considérant que la Norme générale pour les additifs alimentaires doit être la référence appropriée pour les additifs alimentaires et que les comités du Codex sur les produits ont la responsabilité et la compétence pour évaluer et justifier la nécessité technologique de l'emploi d'additifs dans les aliments qui soient réglementés par des normes de produits, la Colombie, en qualité de gouvernement hôte du Comité sur les sucres, demandera au Comité sur les additifs alimentaires d'analyser l'intégration du produit dénommé « jus de canne à sucre déshydraté non centrifugé » dans la Norme générale pour les additifs alimentaires.

11. Une fois effectuée la révision du système de classement des aliments employé dans la norme et du descripteur de chaque catégorie et sous-catégorie et compte tenu de la description du produit à la section 2, nous considérons qu'il convient de demander que le « jus de canne à sucre déshydraté non centrifugé » figure dans la catégorie 11.1.3, qui comprend le sucre blanc doux, le sucre brun (cassonade) doux, le sirop de glucose, le sirop de glucose déshydraté et le sucre de canne non raffiné.

12. En outre, il sera demandé qu'il soit envisagé d'intégrer dans la norme de produit, comme unique additif permis par les bonnes pratiques de fabrication, l'hydroxyde de calcium (SIN 526) comme régulateur d'acidité, car il est nécessaire de contrôler le potentiel d'ions d'hydrogène-pH durant le processus d'élaboration du produit.

13. Ainsi, il y a deux options pour la section « additifs »: Dans la première option, au cas où il ne serait pas possible lors de la quarante-cinquième session du Comité sur les additifs alimentaires (CCFA) de prendre une décision quant à l'inscription du « jus de canne à sucre déshydraté non centrifugé » dans la catégorie 11.1.3, il serait demandé au CCFA d'approuver l'hydroxyde de calcium comme correcteur d'acidité pour ce produit en attendant la décision finale du CCFA quant à l'inscription de ce produit dans la catégorie correspondante de la Norme générale pour les additifs alimentaires, en vue de faciliter la référence à la Norme générale dans la norme relative au produit.

14. Au cas où le Comité du Codex sur les additifs alimentaires se prononcerait, à sa quarante-cinquième session, en faveur de l'inscription du « jus de canne à sucre déshydraté non centrifugé » dans la catégorie 11.1.3 de la Norme générale pour les additifs alimentaires, on incorporerait la référence générale à la Norme générale pour les additifs alimentaires pour la catégorie fonctionnelle « régulateurs de l'acidité » dans la norme relative au « jus de canne à sucre déshydraté non centrifugé » et on incorporerait l'hydroxyde de calcium conformément aux bonnes pratiques de fabrication dans la catégorie fonctionnelle « régulateurs de l'acidité » pour la catégorie 11.1.3 de la Norme générale.

15. La deuxième option permet une certaine flexibilité dans l'actualisation des dispositions relatives aux additifs pour ce produit une fois que le Comité sur les sucres aura conclu ses travaux sur la norme pour le « jus de canne à sucre déshydraté non centrifugé », de sorte que d'éventuels ajouts de catégories fonctionnelles et d'additifs correspondants puissent être apportés, lors de l'examen par le Comité sur les additifs alimentaires de la Norme générale pour les additifs alimentaires, à la suite de la section relative aux additifs, dans la norme de produit, au cas où il serait nécessaire d'y faire figurer d'autres catégories fonctionnelles dont il est établi qu'elles sont nécessaires du point de vue technologique à l'avenir, les additifs correspondants étant inscrits directement dans la Norme générale pour les additifs alimentaires.

Méthodes d'analyse

16. Les méthodes d'analyse sont présentées sous forme corrigée, conformément aux observations et aux recommandations relatives aux usages. Les types correspondants ne sont pas indiqués, puisqu'il appartient au Comité du Codex sur les méthodes d'analyse et d'échantillonnage de prendre une décision sur cette question lors du processus de ratification pertinent.

INVITATION À FORMULER DES OBSERVATIONS

17. Les membres du Codex et observateurs intéressés par la normalisation de ce produit sont invités à communiquer leurs éventuelles observations suivant les indications données sur la page d'accueil en tenant compte des indications données dans les notes explicatives.

**AVANT-PROJET DE NORME DU CODEX POUR LE
JUS DE CANNE À SUCRE DÉSHYDRATÉ NON CENTRIFUGÉ³**

1. CHAMP D'APPLICATION

La présente norme s'applique au jus de canne à sucre déshydraté non centrifugé tel qu'il est défini à la section 2, lorsque ce produit est destiné à la consommation directe, y compris dans la restauration ou en cas de reconditionnement si nécessaire; elle s'applique également à ce produit lorsque celui-ci doit faire l'objet d'une transformation ultérieure.

2. DÉFINITION DU PRODUIT

L'appellation « jus de canne à sucre déshydraté non centrifugé » désigne le produit, sous toutes ses formes, obtenu par évaporation du jus de canne à sucre *Saccharum officinarum L.*, contenant des microcristaux hypautomorphes ou allotriomorphes invisibles à l'œil nu, conservant ses constituants tels que saccharose, glucose, fructose et minéraux et ne résultant pas de la reconstitution de ses éléments (sucres).

3. COMPOSITION ET FACTEURS DE QUALITÉ

3.1 COMPOSITION

3.1.1 Ingrédients de base

Jus de canne à sucre *Saccharum officinarum L.*

3.2 FACTEURS DE QUALITÉ

3.2.1 Couleur

Le jus de canne à sucre déshydraté non centrifugé peut présenter différentes couleurs caractéristiques, en fonction notamment de la variété de canne à sucre utilisée, des conditions agroécologiques et des technologies employées dans le processus de transformation.

3.2.2 Saveur et arôme

La saveur (goût) et l'arôme doivent être caractéristiques du produit.

3.2.3 Défauts

Le produit ne doit pas présenter de défauts tels que corps étrangers, ramollissement. Il ne doit pas avoir fermenté, ni avoir été entamé par des moisissures ou des insectes.

3.2.4 Propriétés physiques et chimiques

Le jus de canne à sucre déshydraté non centrifugé doit être conforme aux exigences indiquées dans les tableaux 1 ou 2, selon les cas.

Tableau 1. Propriétés physiques et chimiques requises pour le jus de canne à sucre déshydraté non centrifugé en bloc

| Propriété | Valeur | |
|--|--------|------|
| | Min. | Max. |
| Humidité, fraction massique en% | -- | 9,0 |
| Cendres, fraction massique en% | 0,8 | -- |
| Sucres totaux (saccharose), fraction massique en% | -- | 83,0 |
| Sucres réducteurs (glucose), fraction massique en% | 5,5 | -- |
| Protéines, en% (N x6,25) | 0,2 | -- |
| Potassium, en mg/100 g | 100,0 | -- |
| Calcium, en mg/100 g | 10,0 | -- |
| Phosphore, en mg/100 g | 5,0 | -- |
| Fer, en mg/100 g | 1,5 | -- |

³ [Noms employés dans certaines régions: (...)].

Tableau 2. Propriétés physiques et chimiques requises pour le jus de canne à sucre déshydraté non centrifugé en poudre

| Propriété | Valeur | |
|--|--------|------|
| | Min. | Max. |
| Humidité, fraction massique en% | -- | 5,0 |
| Cendres, fraction massique en% | 1,0 | -- |
| Sucres totaux (saccharose), fraction massique en% | -- | 93,0 |
| Sucres réducteurs (glucose), fraction massique en% | 5,0 | -- |
| Protéines, en% (N × 6,25) | 0,2 | -- |
| Potassium, en mg/100 g | 100,0 | -- |
| Calcium, en mg/100 g | 10,0 | -- |
| Phosphore, en mg/100 g | 5,0 | -- |
| Fer, en mg/100 g | 1,5 | -- |
| Colorants | Aucun | |

4. ADDITIFS ALIMENTAIRES

Option 1

Seule la catégorie d'additifs alimentaires citée ci-dessous est justifiée sur le plan technologique et peut être utilisée dans les produits visés par cette norme. Dans cette catégorie d'additif, seuls les additifs alimentaires cités ci-dessous peuvent être utilisés et ce, uniquement pour les fonctions et dans les limites spécifiées.

4.1 REGULATEURS D'ACIDITE

| Numéro SIN | Nom de l'additif alimentaire | Concentration maximale |
|------------|------------------------------|------------------------|
| 526 | Hydroxyde de calcium | BPF |

Option 2

Les régulateurs d'acidité utilisés conformément aux tableaux 1 et 2 de la Norme générale pour les additifs alimentaires dans la catégorie alimentaire 11.1.3 – « sucre blanc doux », « sucre roux doux (*cassonade douce*) », « sirop de glucose », « sirop de glucose déshydraté », « sucre de canne brut » et « jus de canne à sucre déshydraté non centrifugé » – ou répertoriée dans le tableau 3 de la Norme générale pour les additifs alimentaires sont admissibles pour l'emploi dans les aliments conformément à cette norme.

5 CONTAMINANTS

5.1 Les produits visés par les dispositions de la présente norme doivent être conformes aux limites maximales de la Norme générale du Codex pour les contaminants et les toxines présents dans les produits destinés à la consommation humaine et animale (CODEX STAN 193-1995).

5.2 Les produits visés par les dispositions de la présente norme doivent être conformes aux limites maximales de résidus pour les pesticides fixées par la Commission du Codex Alimentarius.

6 HYGIÈNE

6.1 Il est recommandé de préparer et manipuler les produits couverts par les dispositions de cette norme conformément aux sections appropriées du Code d'usages international recommandé - Principes généraux d'hygiène alimentaire (CAC/RCP 1-1969), et d'autres documents du Codex pertinents tels que les codes d'usages en matière d'hygiène et les codes d'usages.

6.2 Les produits doivent être conformes à tout critère microbiologique établi en conformité avec les Principes régissant l'établissement et l'application de critères microbiologiques pour les aliments (CAC/GL 21-1997).

7. ÉTIQUETAGE

Le produit couvert par les dispositions de la présente norme doit être étiqueté conformément à la Norme générale du Codex pour l'étiquetage des denrées alimentaires préemballées (CODEX STAN 1-1985). En outre, les dispositions spécifiques suivantes sont applicables:

7.1 NOM DU PRODUIT

7.1.1 Le nom du produit « jus de canne à sucre déshydraté non centrifugé » peut être suivi du nom commun ou générique accepté dans le pays d'origine ou dans le pays de vente au détail.

7.1.2 Le mode de présentation doit faire partie intégrante du nom du produit, comme suit:

- a) jus de canne à sucre déshydraté non centrifugé (nom courant du produit, par exemple « panela en bloc »).
- b) jus de canne à sucre déshydraté non centrifugé (nom courant du produit, par exemple « panela en poudre »).

8. MÉTHODES D'ANALYSE ET D'ÉCHANTILLONNAGE

| Disposition | Méthode | Principe | Type |
|--|----------------------------|---|------|
| Humidité | AOAC 925.45 | Réduction par séchage | |
| Cendres | AOAC 900.02 | Incinération | |
| Sucres totaux (saccharose) et réducteurs (glucose) | AOAC 923.09 | Méthode volumétrique | |
| Calcium, fer et potassium | AOAC 985.35 | Spectrométrie d'absorption atomique (mode flamme) | |
| Phosphore | AOAC 995.11 | Colorimétrie | |
| Sulfites | AOAC 975.32 et AOAC 990.28 | Monier Williams | |

ANNEXE II

Les observations soumises en réponse à la CL 2011/25-CS
(DISPONIBLE SEULEMENT EN LANGUE ORIGINALE)

BRAZIL/BRÉSIL/BRASIL

General comments:

Brazil congratulates Colombia for taking this work on a new Codex Standard that covers the Non-Centrifugal Sugars “panela” (“rapadura” in Brazil) and ground “panela” (“açúcar mascavo” in Brazil).

Assessing the particularities of sugar process, Brazil would like to highlight that not only the adopted process, but also Sulfur Dioxide provisions for the proposed draft standard for Panela should diverge from white and brown sugars on Codex Standard for Sugars (Codex Stan 212/1999).

Panela is first evaporated without the use of sulphites and white and brown sugars are crystallized and sulphated.

In that sense considering the extensive list of denominations for the product (footnote nr 2 of the proposed Draft) and the approach adopted for the Codex Standard for Sugars (Codex Stan 212/1999 encompassing a broad range of sugars), Brazil would like to suggest amending the title of the proposed Draft from “Codex Standard for Panela” to “Codex Standard for Non-Centrifugal Sugars”.

This approach is in line with FAO stats and definitions (<http://www.fao.org/es/faodef/fdef03e.htm>) and brings flexibility to the Standard allowing development of a standard for “Panela” and “ground Panela” amid possible inclusion of products that are not closely related with “Panela” provisions and not listed in the proposed Draft.

Specific Comments:

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| Current provision at the Proposed Draft Standard |
| <p>1. SCOPE</p> <p>This Standard is applicable to panela as defined in section 2 infra, for direct consumption; as well as to the product intended for subsequent processing, where indicated. The present standard establishes the requirements and testing to which panela, in its different presentations, must submit.</p> |
| Proposal |
| <p>1. SCOPE</p> <p>This Standard is applicable to panela non-centrifugal sugars, as defined in section 2 below infra, intended for human consumption. This Standard does not cover products that have been flavoured and/or undergone further processing as well as products obtained from the reconstitution of its elements (sugars), for direct consumption; as well as to the product intended for subsequent processing, where indicated. The present standard establishes the requirements and testing to which panela, in its different presentations, must submit.</p> |
| Rationale |
| <p>Brazil would like to highlight that trying to embrace all panela presentations (both basic, formulated and/or flavoured panela) may not be feasible.</p> <p>Formulated and/or flavoured products impacts composition table values and negatively affects both analysis and final results.</p> <p>Other proposed changes are editorial and aligned with recent standards approved by other Codex Commodity Committees to keep text simple.</p> |

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| Current provision at the Proposed Draft Standard |
| <p>2. DESCRIPTION</p> <p>2.1 PRODUCT DEFINITION</p> <p>Panela is defined as the product, in any form or presentation, obtained from the evaporation of sugarcane juice <i>Saccharum officinarum</i> L., without centrifuging, which contains amorphous subhedral or anhedral microcrystals, invisible to the naked eye, which maintains its constituent elements, such as saccharose, glucose, fructose and minerals, and is not obtained from the reconstitution of its elements (sugars).</p> |
| Proposal |
| <p>2. DESCRIPTION</p> <p>2.1 PRODUCT DEFINITION</p> <p><u>Non-centrifugal sugar</u> is the product obtained from the evaporation of sugarcane juice <i>Saccharum officinarum</i> L. <u>processed</u> without <u>centrifugation</u> and <u>non sulphited; containing</u> microcrystals and <u>maintaining its constituent elements, such as saccharose, glucose, fructose and minerals.</u></p> <p><u>2.2 NON-CENTRIFUGAL SUGAR TYPES (COMMON NAMES)</u></p> <p><u>The commonly known names as indicated below shall be used, bearing the product is in accordance with the provisions of this standard: Chancaca (Chile, Ecuador and Peru); Cokuto (Japan); Gur or Jaggery (India); Jaggery and Khandsari (South Asia); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and certain Central American countries); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Açúcar mascavo (Brazil); Tapa de dulce, dulce granulado (Costa Rica).</u></p> |
| Rationale |
| <p>Editorial:</p> <p>removal of "in any form of presentation" - the forms of presentation are already listed on section 2.2 of the Draft.</p> <p>reallocation of "and is not obtained from the reconstitution of its elements (sugars)" to the Scope as this is more related to the limits of the Standard.</p> <p>removal of adjectives for microcrystals to keep the standard simple.</p> <p>Explicitly specify that non-centrifugal sugars are not sulphated during process. Besides, according to Brazilian regulation Sulphur dioxide is not allowed for açúcar mascavo and rapadura. As sulphite addition is not a processing step of non-centrifugal sugars this should be highlighted on the proposed standard.</p> <p>inclusion of section 2.2 to illustrate possible names to be adopted in section 7 (Labelling). If the process of any of the listed regional products differs from 2.1 then a sub section should be adopted to address the differences as well as a new column on the proposed tables.</p> <p>Other minor editorial changes to keep text simple.</p> |
| We would like to highlight that a specific footnote should be added on food sub-category 11.1.3 Soft white sugar - Excluding panela |

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| Current provision at the Proposed Draft Standard |
| <p>3.2.2 Flavour and aroma</p> <p>The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign substances. The aroma will be that characteristic of the product without any undesirable odour.</p> <p>In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.</p> |
| Proposal |
| <p>3.2.2 Flavour and aroma</p> <p>The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign substances. The aroma will be that characteristic of the product without any undesirable odour.</p> <p>In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.</p> |
| Rationale |
| Flavoured products should not be within the scope of the Standard as stated before. |

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| Current provision at the Proposed Draft Standard | | |
| 3.2.4 Physical and chemical characteristics | | |
| | Table 1 | Table 2 |
| Ashes, mass fraction% | 0.8 (mín) | 1.0 (mín) |
| Non-reducing sugars, mass fraction% | 83.0 (máx) | 93.0 (máx) |
| Potassium mg/100 g | 100.0 (mín) | 100.0 (mín) |
| Proposal | | |
| 3.2.4 Physical and chemical characteristics | | |
| | Table 1 | Table 2 |
| Ashes, mass fraction% | 0.7 (mín) | 0.8 (mín) |
| Non-reducing sugars, mass fraction% | 81.0 (mín) | 84.0 (mín) |
| Potassium mg/100 g | 60.0 (mín) | 60.0 (mín) |
| Rationale | | |
| Proposed values are needed to encompass Brazilian Rapadura and Açúcar mascavo. | | |

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| Current provision at the Proposed Draft Standard |
| 4. FOOD ADDITIVES |
| Comment and Rationale |
| <p>Although INS 338 – Phosphoric acid (GMP) was included as an acidity regulator (section 4.1) Brazil would like to highlight that JECFA established a MTDI of 70mg/kg for phosphorus.</p> <p>In that sense it is advisable to discuss a maximum level which is technologically justified for INS 338.</p> <p>http://www.fao.org/ag/agn/jecfa-additives/specs/Monograph1/Additive-312.pdf</p> |

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| Current provision at the Proposed Draft Standard |
| 4.3 In relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs. |
| Proposal |
| 4.3 In relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs. |
| Rationale |
| <p>Flavoured products should not be within the scope of the Standard as stated before.</p> <p>Whilst proposed, Colorants should detail a list of colorants with their numeric values, according to their established IDA by JECFA.</p> |

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| Current provision at the Proposed Draft Standard |
| <p>7. LABELLING</p> <p>7.1 NAME OF THE PRODUCT</p> <p>7.1.1 The product name will be “Panela” followed by the ordinary name currently accepted in the country of retail sale.</p> <p>7.1.2 The labelling shall specify any aroma or flavouring characterizing the product. The food name “Panela” shall be accompanied by the phrases “aromatized with x” or “flavoured with x”, as the case may be.</p> <p>7.1.3 The form of presentation (styles) shall be included as part of the name as follows:</p> <p>a) “Solid Panela”.</p> <p>b) “Granulated Panela”.</p> |
| Proposal |
| <p>7. LABELLING</p> <p>7.1 NAME OF THE PRODUCT</p> <p>7.1.1 <u>The name of the product shall be the commonly known names as indicated in Section 2.2.</u> <u>The product name may be followed by the ordinary name currently accepted in the country of retail sale.</u></p> <p>7.1.2 The labelling shall specify any aroma or flavouring characterizing the product. The food name “Panela” shall be accompanied by the phrases “aromatized with x” or “flavoured with x”, as the case may be.</p> |

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| 7.1.3 The form of presentation (styles) shall be included as part of the name as follows: a) "Solid Panela (name of the product)". b) "Granulated Panela (name of the product)". |
| Rationale |
| Panela is a regional name and its use worldwide may not be feasible and/or clear enough for a Codex Standard. Flavoured products should not be within the scope of the Standard as stated before. |

| Current provision at the Proposed Draft Standard | | | | |
|--|--------------|--|------|---|
| 8 METHODS OF ANALYSIS AND SAMPLING | | | | |
| Provision | Method | Principle | Type | Preparation of the sample |
| Moisture | AOAC 925.45 | <i>Gravimetry, dried at atmospheric pressure</i> | IV | <i>kg of the sample is divided in two; 500 kg is crushed and then sieved, passing through mesh No. 40 (425 µm).</i> |
| Ash | AOAC 900.02 | <i>Gravimetry</i> | - | |
| Total sugars (saccharose) and (glucose) | AOAC 923.09 | <i>Volumetry</i> | - | |
| Calcium, iron and potassium | AOAC 985.35 | Spectrophotometry by flame atomic absorption | III | <i>In the case of wet digestion, the sample can be prepared as follows: Starting with the sample preparation described above, 1 g is taken and dissolved in 100 mL of distilled water. In the case of dry digestion, by ashes, the sample is prepared as indicated in the AOAC methodologies described for each analysis.</i> |
| Phosphorous - | AOAC 995.11 | <i>Colormetric method</i> | - | |
| Proposal | | | | |
| Provision | Method | Principle | Type | |
| Moisture | AOAC 925.45B | <i>Gravimetry, dried at atmospheric pressure</i> | IV | |

| | | | |
|--|-------------------|---|----|
| Ash | AOAC 900.02A or B | <i>Gravimetry</i> | IV |
| Total sugars (saccharose) and (glucose) | AOAC 923.09 (5) | <i>Volumetry</i> | IV |
| Calcium, iron and potassium | AOAC 985.35 | Spectrophotometry by flame atomic absorption | IV |
| Phosphorous - | AOAC 995.11 | <i>Colorimetric method</i> | IV |
| Rationale | | | |
| <p>For all methods, preparation column is not within standardized text in Codex Standards.</p> <p>For all methods, please consider to classify as Type IV being all methods are not validated to non-centrifugal sugars.</p> <p>For moisture, method AOAC 925.45B is the appropriate method for sugar cane, beet sugar, as well as for refined and non refined sugars.</p> <p>For Ash, method AOAC 900.02 <u>A</u> or <u>B</u> are applicable to syrups.</p> | | | |

COSTA RICA

Costa Rica agradece la atención a los siguientes comentarios:

Sección 2.

2.1 Definición del Producto:

Costa Rica sugiere incorporar el texto resaltado

Se entiende por panela el producto de cualquier forma o presentación proveniente de la **extracción, clarificación (eliminación de sólidos), evaporación, concentración y posterior moldeo de la miel** del jugo de caña de azúcar *Saccharum officinarum* L., sin centrifugar, que contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales, y que no proviene de la reconstitución de sus elementos (azúcares).

2.2 Formas de presentación

2.2.3 Costa Rica sugiere incluir la presentación de la panela saborizada y aromatizada- esto por cuanto se menciona dentro del cuerpo de la norma, pero no se especifica su denominación.

3.1.2 Otros ingredientes

Se permite la adición de otros productos alimentarios (nueces, maní, entre otros)

3.2.1 Color

Costa Rica sugiere incorporar la siguiente frase:

“Es de color amarillo, pardo o pardo oscuro”.

3.2.3 Defectos

Costa Rica sugiere incorporar la frase resaltada, ya que no se especifica en el documento qué se entiende por materia extraña:

La panela debe estar exenta de defectos tales como materias extrañas (**impurezas de origen orgánico y mineral**), ablandamiento; no puede estar fermentada ni presentar ataques de hongos y plagas.

7. Etiquetado

Costa Rica sugiere valorar la posibilidad de declarar en la etiqueta el uso de aditivos denominados sulfitos, con el fin de proporcionar información al consumidor hipersensible.

Lo anterior, debido a que algunos productores de panela utilizan estos aditivos para blanquear el producto, a lo cual su uso indiscriminado (en concentraciones de 10 mg/kg o más) puede ocasionar daños a la salud, según la Norma General del Codex para el Etiquetado de los Alimentos Preenvasados (CODEX STAN 1-1985).

Otras consideraciones:

1. Costa Rica además considera necesario incorporar en el Anteproyecto de Norma Panela, que para la elaboración de estos productos no se permite el uso de azúcar, barredura de azúcar, miel, jarabes o cualquier otro tipo de fuente de sacarosa diferente al jugo de caña de azúcar, esto con el fin de evitar el engaño al consumidor.
2. Se solicita aclarar aspecto en relación al aditivo ácido fosfórico, ya que no se encontró en la categoría de alimentos 05.2.3 en que se podría ubicar la panela.

ECUADOR / ÉQUATEUR

En atención a la CL 2011/25-CS a continuación remito las observaciones de la empresa ecuatoriana ARTEAGRICOLA CIA. LTDA. al CX 5/10.2 - CCS: CL 2011/25-CS [S] "Proposed Draft Codex Standard for Panela" (at Step 3):

1. En la parte de definición de producto dice: SIN CENTRIFUGAR, y esto no es del todo cierto, ya que en el proceso de Elaboración de panela granulada si se centrifuga la miel de caña, no ocurre esto en el proceso de panela en Bloque.
2. La denominación de PANELA es correcta sin embargo considerar que en ITALIA una empresa denominada GTC.SRL. de propiedad de Sr. Giovanni Consolli, ha registrado este nombre como marca, lo cual no debe ser permitido ya que el nombre es un genérico con el cual se conoce a esta AZUCAR INTEGRAL DE CANIA que es como técnicamente debería identificarse.

**EUROPEAN UNION (MEMBER ORGANIZATION) / UNION EUROPÉENNE (ORGANISATION MEMBRE) /
UNIÓN EUROPEA (ORGANIZACIÓN MIEMBRO)****General Comments**

The European Union and its Member States (EUMS) do not support the inclusion of the definition of "panela" in the Food Category System (FCS) of the GSFA (paragraph 4 of CL 2011/25-CS). The EU believes that the reference to "*panela*" or "*sugar cane juice products*" would be sufficient since the definition itself will be a part of the standard for panela.

In relation to the definition, the EUMS consider that the new standard for panela should distinguish panela from sugars that are defined in the Codex Standard for Sugars (CODEX STAN 212-1999). It is particularly necessary to ensure that the definition of panela does not overlap with the definitions of standardized sugars in the Codex Standard for Sugars such as soft brown sugar or raw cane sugar. As the proposed definition for panela is very broad difficulties in distinguishing panela from sugars can be expected. Such an overlap could be avoided if the definition of panela would clarify that it is a vital criterion of panela that sugar cane juice is just thickened in the manufacturing process and has not undergone any subsequent processing step when the thickened sugar cane juice is purified.

The EUMS note the proposal to include panela in the FCS subcategory 11.1.3. In this respect the EUMS would like to highlight that the subcategory 11.1.3 exclusively contains sugars covered by the Codex Stan 212-1999. The use of food additives is considerably limited in this subcategory. Therefore, adding panela directly to this subcategory does not seem to be reasonable and other options should be considered.

The appropriate categorisation of panela in the FCS would depend, inter alia, on food additives needed and technologically justified. A proper technological justification should be provided for all additives listed in the standard. At present the proposed draft standard refers also to food grade colorants (section 4.3) and flavourings. This kind of general reference is not appropriate. No colours and no limits are specified in the standard.

Moreover, the use of food colours would be in clear conflict with the section 3.2.1 (colour) which states that panela may exist in various colours, depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process. The use of food colours would mislead the consumer in this respect. Furthermore, the use of food colours is not usual in raw or partially processed products (i.e. panela is unrefined whole cane sugar). Due to these reasons the EU questions the use of food colours in panela. The EU also questions the use of flavourings and would like to ask for clarification why flavourings are needed in unrefined cane sugar.

As for the classification under the FCS the EUMS are of the view that a new subcategory "11.1.3.3 Sugar cane juice products" could be considered. However, if the technological justification for the use of food colours and flavourings is provided then in the EUMS's view, panela should fall under the category "11.4 Other sugars and syrups" which includes more processed products.

Specific Comments

The section 4.1 Acidity regulators contains INS 338 Phosphoric acid at GMP. The EUMS would like to note that phosphoric acid is not included in Table 3 of the GSFA, therefore, the maximum level should be expressed as a numeric value.

Section 7.1.2 requires a labelling statement "*aromatized with x*" or "*flavoured with x*" in order to

- a) specify any aroma or flavourings characterising the product and
- b) in case that an aroma or flavouring alters the characteristic aroma or flavour of the product.

The labelling statements will be the same in both cases, i. e. consumers will not see from the labelling whether the flavouring/aroma added results in a characteristic flavour/aroma or in an altered one. The intention would be to inform consumers about any addition of aroma/flavour without saying the reason for the addition (i. e. provide for a characteristic or alter the aroma/flavour).

Therefore, some explanation would be needed to clarify the intention of the labelling requirements:

7.1.2 *The labelling shall specify any added aroma or flavouring characterising the product or altering the characteristic aroma or flavouring. The food name "Panela" shall be accompanied by the terms "aromatized with x" or "flavoured with x", as the case may be.*

As a consequence the deletion of the last sentence in section 7.1.2 is proposed.

JAPAN/JAPON/JAPÓN

Japan is pleased to provide the following comments and would like to seek some clarification on the Proposed Draft Standard for Panela and the descriptor for the Food Category 11.1.3 in GSFA as a producer of a cane sugar called *Kokutou/Kurozatou* which is obtained from the evaporation of sugarcane juice without centrifuging, and is partly exported.

Comments on the Proposed Draft Codex Standard for Panela

General Comments

First of all, we suggest that this Proposed Draft Standard be established and then included as one of sugars stipulated in the Codex Standards for Sugars (CODEX STAN 212-1999) not as a stand-alone standard. In the mean time, we would like to submit our specific comments on the Proposed Draft Standard as follows;

Specific Comments

1. Name of the Standard

Japan does not support to use "Panela" as the name of Standard because this type of sugar with a variety of names is produced in certain regions in the world and traded globally, and the name of "Panela" is commonly known in only a certain region as mentioned in this Standard. Moreover, as for the Codex Standards for Sugars (CODEX STAN 212-1999), the general English names such as "white sugar", "soft brown sugar" and "raw cane sugar" are used. Therefore, Japan proposes that the general English name e.g., "sugarcane juice sugar" or "non-centrifuged sugar" be adopted for defining the product in this Standard, instead of "Panela".

2. Physical and chemical characteristics (Section 3.2.4)

Table 1 and 2: Physical-chemical requirements for solid and granulated panela

- It is well known globally that the existing high content of reducing sugars which is so hygroscopic causes adverse effects such as clotting and discoloring on the preserving property and quality of sugar. Specifically regarding this type of sugar such as *kokutou* and *panela*, the high content of reducing sugars facilitates the products absorb moisture and leads to getting moldy because those sugar contain more impurities than centrifuged sugars. Therefore, the content of reducing sugars tends to be kept at level as low as possible in Japan. We suggest that maximum value of reducing sugars be defined in this Standard instead of the minimum content because of its undesirable effect on *Kokutou* as above. In addition, the recent data in Japan shows that the minimum content of reducing sugars in *Kokutou* is 1.5% and the maximum is 4.0%.
- As for non-reducing sugars, the minimum content should be defined instead of the maximum from the same reason. In addition, the recent data in Japan shows that the minimum content of non-reducing sugars in *Kokutou* is 79.0% and maximum is 88.3%.
- As reasons above, we seek a clarification on the reason why the maximum value for non-reducing sugars and the minimum value for reducing sugars are stated in this Standard.
- We would like to ask clarification regarding "Colorants" stated in this section, if "Colorants" mean food additives which should be listed in the section 4 "Food Additives", we suggest that "Colorants" be deleted in this section and be moved to the section 4.

3. Food Additives (Section 4)

General comments on the section for Food Additives

- Although the sentence "in the corresponding Annexes are technologically justified" is stated in this section, Annexes are not found in the entire proposed draft. If there are some Annexes indicated for technological justification of food additives, we need those Annexes.
- We suggest that the new sub sections for "Processing aid", "Colour" and "flavouring" should be established. Please refer to our comments below.

Specific comments on the section for Food AdditivesCalcium hydroxide (526)

- In Japan, Calcium hydroxide (526) is used as a processing aid in order to precipitate impurities from sugarcane juice. Therefore, Calcium hydroxide (526) should be removed from the section 4.1 “Acidity Regulators” and listed in the new sub section “Processing aid”.

An example format used for processing aids in Commodity Standards is the following:

Processing aid – Maximum use level is in line with Good Manufacturing Practices

| Function | Substance |
|-----------------------------------|-------------------|
| Clarifying agents/filtration aids | Calcium hydroxide |

Phosphoric acid (338)

- Since Phosphoric acid has a numerical ADI, the maximum use level should be numerical not GMP. Moreover, other phosphates could be used as acidity regulators in line with the practice of the GSFA to establish food additive maximum use levels.

Colour and flavouring

- Section 4.3 states that “in relation to the flavoured panela variety specifically, the use of flavourings and food grade colorants can be permitted, with their use limited to GMPs”. However, individual provisions of food additives with colour fuction and flavouring should be established. Also, if this standard needs to include “flavoured panela”, sections related to “flavoured panela” should be added to this Standard.

4. Labelling (Section 7.1)

- As mentioned above, a sugar covered by this Standard is made and traded with various names throughout the world. Thus, the “Panela”, one of the regional names, should not be used for labeling it but each regional name should be used. And if ever, in order to avoid confusion, the general English name may follow it. In addition, we need a clarification regarding the way of labeling for the product name under the section 7.1 as to whether we have to label “Kokutou” as “Panela (Kokutou)”. As reason above, we does not support the use of “Panela” as this product name.

Comments on the descriptor for the Food Category 11.1.3 “Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar” in GSFA

- We propose to add the general English name like “sugarcane juice sugar” or “non-centrifuged sugar” not “panela” to the title of this category because the name of “Panela” is commonly known in only a certain region.
- We propose to revise the descriptor. Our comment is presented in **bold font** (addition) as follows;

“Soft white sugar is fine grain purified, moist sugar, that is white in colour. Soft brown sugar is fine grain moist sugar that is light to dark brown in colour. Glucose syrup is a purified concentrated aqueous solution of nutritive saccharides derived from starch and/or inulin. Dried glucose syrup is glucose syrup from which water has been partially removed. Raw cane sugar is partially purified sucrose crystallized from partially purified cane juice without further purification. **Sugarcane juice sugar (or non-centrifuged sugar) is obtained from the evaporated sugar cane juice without centrifuging.**”

- According to the section 5 of Preamble to the GSFA, the food category descriptors are not to be legal product designations nor are they intended for labelling purposes. Therefore, it is not necessary that the entire product definition stated in the Proposed Draft Standard for Panela is included in the descriptor of Food Category 11.1.3.
- As for the product name, please refer our comment above.

MEXICO/MEXIQUE/MÉXICO**MÉXICO**

México reitera su compromiso con el Codex Alimentarius y agradece la oportunidad de realizar comentarios al Anteproyecto de Norma para la Panela, propuesto por la Delegación de Colombia, **ANTEPROYECTO DE NORMA DEL CODEX PARA LA PANELA CX 5/10.2CL 2011/25-CS 2-**

Comentarios Generales:

México desea manifestar su interés por ampliar el tiempo de revisión del anteproyecto propuesto en virtud de que en nuestro país, parte importante de la producción de panela corresponde a una especialidad artesanal, con objeto de revisar a profundidad este documento con el mayor número de productores.

Comentarios Particulares:

| DICE | DEBE DECIR | JUSTIFICACION |
|---|---|--|
| <p>1. ÁMBITO DE APLICACIÓN</p> <p>Esta norma se aplica a la panela, según se define en la sección 2 <i>infra</i>, que está destinada al consumo directo; como también al</p> <p>producto, cuando se indique, que está destinado a una elaboración ulterior. La presente norma establece los requisitos y los ensayos que debe cumplir la panela en sus diferentes presentaciones.</p> | <p>1. ÁMBITO DE APLICACIÓN</p> <p>Esta norma establece las especificaciones y los métodos de ensayo que debe cumplir la panela, según se define en la sección 2, destinada al consumo directo.</p> | <p>Se considera que esta redacción da mayor claridad al ámbito de aplicación.</p> |
| <p>2. DESCRIPCIÓN</p> <p>2.1 DEFINICIÓN DEL PRODUCTO</p> <p>Se entiende por panela el producto de cualquier forma o presentación proveniente de la evaporación del jugo de caña de azúcar <i>Saccharum officinarum L.</i>, sin centrifugar, que contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano que mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales, y que no proviene de la reconstitución de sus elementos (azúcares).</p> | <p>2. DESCRIPCIÓN</p> <p>2.1 DEFINICIÓN DEL PRODUCTO</p> <p>Se entiende por panela al producto proveniente de la evaporación del jugo de caña de azúcar (<i>Saccharum officinarum L.</i>), sin centrifugar, en cualquier forma o presentación. Contiene microcristales subhedrales o anhedrales amorfos no visibles al ojo humano y mantiene sus elementos constitutivos como sacarosa, glucosa, fructosa y minerales. Se excluye de la presente norma, el producto que provenga de la reconstitución de sus elementos (azúcares).</p> | <p>Se considera que esta redacción da mayor claridad a la definición del producto.</p> |
| <p>2.2 FORMAS DE PRESENTACIÓN</p> <p>2.2.1 Sólida - producto macizo y compacto presentado en diferentes formas.</p> <p>2.2.2 Granulada - producto presentado en forma de granos.</p> <p>2.2.3 Otras formas de presentación - se permitirá cualquier otra forma de presentación del producto, a condición de que éste:</p> <p>a) se distinga suficientemente de las otras formas de presentación establecidas en la Norma;</p> <p>b) cumpla todos los requisitos pertinentes de la norma, incluidos los correspondientes a los factores esenciales de composición y calidad, y cualquier otro requisito que sea aplicable a la forma de presentación estipulada; y</p> | <p>2.2 FORMAS DE PRESENTACIÓN</p> <p>La Panela es un producto macizo y compacto que puede presentar las siguientes formas:</p> <p>2.2.1 Bloque o Moldeado.- producto macizo y compacto presentado en diferentes formas.</p> <p>2.2.2 Granulada - producto presentado en forma de granos.</p> <p>2.2.3 Otras formas de presentación</p> <p>Éstas serán permitidas, siempre y cuando el producto:</p> <p>a) se distinga suficientemente de las otras formas de presentación establecidas en la Norma;</p> <p>b) cumpla todos los requisitos pertinentes de la norma, incluidos los correspondientes a los factores esenciales de composición y calidad, y cualquier otro requisito que sea aplicable a la forma de presentación estipulada; y</p> | <p>Este producto generalmente es macizo.</p> |

| DICE | DEBE DECIR | JUSTIFICACION |
|---|---|---|
| c) se describa debidamente en la etiqueta para evitar errores o confusión por parte del consumidor. | c) se describa debidamente en la etiqueta para evitar errores o confusión por parte del consumidor. | |
| 3. COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD 3.1 COMPOSICIÓN ESENCIAL 3.1.1 Ingredientes básicos Jugo de caña de azúcar <i>Saccharum Officinarum</i> L | 3. COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD 3.1 COMPOSICIÓN ESENCIAL 3.1.1 Materia Prima Jugo de caña de azúcar <i>Saccharum Officinarum</i> L | Por la naturaleza del producto, se debe sustituir el título del 3.1.1 Ingredientes básicos por Materia Prima En el texto, cambiar el nombre científico a cursiva o bien subrayado. |
| 3.2 FACTORES DE CALIDAD 3.2.1 Color La panela puede presentar diferentes colores dependiendo, entre otros aspectos de la variedad de la caña, las condiciones agroecológicas y del proceso de elaboración. 3.2.2 Sabor y Aroma El sabor será el característico del producto, sin malos sabores debidos a deterioro o a la absorción de sustancias extrañas. El aroma será el característico del producto y no deberá poseer ningún olor indeseable. Para la panela saborizada y aromatizada, el sabor y aroma serán los característicos del saborizante y aromatizante adicionados. | SIN COMENTARIOS | |
| 3.2.3 Defectos La panela debe estar exenta de defectos tales como materias extrañas, ablandamiento; no puede estar fermentada ni presentar ataques de hongos y plagas. | 3.2.3 Defectos-Requisitos Generales 3.2.3.1 La panela, deberá cumplir con los criterios microbiológicos para los alimentos establecidos en CAC/GL21-1997. 3.2.3.2 No debe presentar indicios de ataques por hongos o plagas, ablandamiento o fermentación. | Por las características del producto, más que defectos, se establecen requisitos generales. Existen criterios establecidos para materia extraña por el propio Codex Alimentarius. |
| 3.2.4 Características físicas y químicas | | |
| La panela debe cumplir con lo indicado en los cuadros ¹ y ² . Cuadro 1. Requisitos físico químicos para la panela sólida Cuadro 2. Requisitos físico químicos para la panela granulada | México se abstiene de comentar estas tablas hasta evaluar estas especificaciones con los análisis de los productores de panela. | Se estará trabajando con los productores de panela con objeto de comparar las especificaciones propuestas en el anteproyecto con las nacionales. |

| DICE | DEBE DECIR | JUSTIFICACION |
|--|--|--|
| <p>4. ADITIVOS ALIMENTARIOS</p> <p>Solo las clases de aditivos alimentarios indicadas abajo están tecnológicamente justificadas y pueden ser empleadas en productos amparados por esta Norma. Dentro de cada clase de aditivo solo aquellos aditivos alimentarios indicados abajo, o relacionados, pueden ser empleados y solo para aquellas funciones, y dentro de los límites, especificados.</p> | | <p>Se estará trabajando con los productores de panela con objeto de comparar las especificaciones propuestas en el anteproyecto con las nacionales.</p> |
| <p>4.1 Reguladores de la Acidez</p> | <p>Se propone que la información incluida en el 4.1 Reguladores de la Acidez</p> <p>a) Incorpore la dosis máxima de uso acorde a algún referente CODEX</p> <p>b) Excluya la columna para dosis máxima de uso, ya que en muchos casos, estas especificaciones son Regulaciones de cada país.</p> | |
| <p>4.2 Antiaglutinantes</p> | <p>Mismo comentario que para 4.1</p> | |
| <p>4.3 En relación específica a la variedad panela saborizada se puede permitir el uso de saborizantes y colorantes de grado alimenticio limitando el uso a las BPM</p> | <p>Mismo comentario que para 4.1</p> | |
| <p>8. MÉTODOS DE ANÁLISIS Y MUESTREO</p> <p>El anteproyecto de norma para panela, contempla Métodos de Prueba AOAC.</p> | <p>8. MÉTODOS DE ANÁLISIS Y MUESTREO</p> <p>Modificar los Métodos de Prueba para humedad, cenizas, azúcares totales, Calcio, Hierro y Potasio, conforme a la propuesta descrita a continuación:</p> | <p>En el mercado internacional los métodos de prueba aceptados mundialmente son los métodos establecidos en ICUMSA, lo que representa un estándar global.</p> |

Métodos de Análisis y Muestreo

| Disposición | Método | Principio |
|--|---------------------|---|
| Humedad | GS2/1/3/9-15 (2007) | Determinación de la humedad del azúcar por pérdida en el secado-Oficial |
| Cenizas | GS2/3-17 (2002) | Determinación de cenizas conductimétricas en productos de azúcar refinado-Oficial. |
| Azúcares totales (sacarosa) y reductores (glucosa) | GS2/3-9-5 (2007) | Determinación de azúcares reductores en azúcar purificado mediante el método EDTA de Knight y Allen-Oficial |

| Disposición | Método | Principio |
|--------------------------|--------------------------------------|--|
| Calcio, Hierro y Potasio | GS2/3/7/8-31 (1994); GS2/3-29 (1994) | Determinación de hierro en productos de azúcar refinado y en soluciones de azúcar mediante un método colorimétrico-Aceptado. |
| Fósforo | AOAC 995.11 | Método colorimétrico |

PHILIPPINES / FILIPINAS

Hereunder are the comments from the Philippines for your consideration. Thank you.

On amendment of the GSFA:

The Philippines request clarification regarding the proposal to amend 11.1.3 and not 11.2 of the GSFA. While the proposal is to amend Subcategory 11.1.3 of the Codex GSFA which includes soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, and raw cane sugar, amending Subcategory 11.2 ("Brown sugar excluding products of food category 11.1.3; Includes large-grain, brown or yellow lump sugars, such as Demerara sugar.") should be considered instead. Panela could be defined separately after Demerara to distinguish this from Demerara. Panela, as a brown sugar, is more closely related to Demerara and should be classified with it rather than classifying it together with soft white sugar and soft brown sugar which are specialty sugars obtained from refined sugar. On the other hand, while Demerara passes through centrifugals, it is not obtained from refined sugar but is also processed directly from cane juice..

General Comments:

The Philippines would like to bring the attention of the Committee on the use of "Panela" as the name of the Standard. Similarly, we would like to emphasize that "Panela" is not the generic name for this type of sugar. Panela may be the name used in certain countries like Bolivia, Colombia, Honduras, Nicaragua, Panama and others; however, this is not the term used in many other countries, as indicated in the footnote of the title. Such usage will have a profound trade impact particularly in the labelling of the product. In view thereof, the Philippines would like to seek clarification from the Codex Secretariat and Codex member countries in addressing this concern.

For now, the Philippines would like to propose the following amendment to the footnote in the title:

~~Commonly known~~ **Equivalent to** in certain regions as: Chancaca (Chile, Ecuador and Peru); Cokuto (Japan); Gur or Jaggery (India); Jaggery and Khandsari (South Asia); **Muscovado (Philippines)**; Panela (Bolivia, Colombia, Honduras, Nicaragua, Panama and others); Papelón (Venezuela and certain Central American countries); Piloncillo (Mexico); Rapadura (Brazil and Cuba); Tapa de dulce, dulce granulado (Costa Rica).

1. SCOPE

The Philippines would like to seek clarification on the facet "for direct consumption" as used in the scope of the standard and recommend the use of the phrase "for human consumption" instead.

2. DESCRIPTION

2.1 Product Definition

For clarity, the Philippines proposes the following edits to the definition:

Panela is defined as the product, in any form or presentation, obtained from the evaporation of juice from sugarcane *Saccharum officinarum* L., without centrifugation. It contains only natural anhydrous microcrystals of sucrose, of irregular shape, not visible to the naked eye which is surrounded by molasses and other constituents of sugarcane. It may be flavoured, aromatized, and should not be obtained from the reconstitution of its primary components.

2.2 Forms of Presentation (~~Styles~~)

2.2.1 Amorphous – product presented in powder form

~~2.2.1.2 Solid Lump~~ **2.2.1.2 Solid Lump** – solid and/or compact product presented in different form

The Philippines notes that if this form includes granulated sugar, then we propose to delete the word compact as well.

~~2.2.2 Granulated – product presented in grain form~~

Rationale: Amorphous is the most common form presented for this kind of sugar, hence we are proposing to add it in the list. Similarly, solid is changed to lump, as the latter is the most frequently used term in international trade. Granulated on the other hand is mostly considered as lump depending on the size of the granule as per specificities prescribed by the importing countries or traders.

We also support to retain the following section:

2.2.3 Other forms of presentation - Any other presentation of the product should be permitted provided that the product:

- a) is sufficiently distinctive from other forms of presentation laid down in the Standard;
- b) meets all relevant requirements of the Standard, including those requirements relating to essential composition and quality factors, and any other requirements which are applicable to the stipulated form of presentation; and
- c) It fulfils all the requirements relating to the standard, including the essential composition and quality factors, and any other requirement that is applicable to the stipulated form of presentation;

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS**3.1 ESSENTIAL COMPOSITION****3.1.1 Basic ingredients**

~~Sugarcane juice (*Saccharum Officinarum* L)~~

3.2 QUALITY FACTORS**3.2.1 Colour**

~~Panela may exist in various colours, depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process.~~

3.2.2 Flavour and aroma

~~The flavour will be that characteristic of the product, without bad tastes caused by deterioration or the absorption of foreign substances. The aroma will be that characteristic of the product without any undesirable odour. In the case of flavoured and aromatized panela, the flavour and aroma will be those characteristic of the added flavouring and aroma.~~

3.2.3 Defects

~~The panela will be free from defects such as foreign materials or softening. It may not be fermented or show signs of attacks by fungi and pests.~~

The Philippines proposes that 3.2.3 Defects of this section be deleted and be included as Foreign Matters, a section to be added after Contaminants.

Moreover, the Philippines is proposing the following edits for clarity:

3.1 ESSENTIAL COMPOSITION

Panela sugar is essentially composed of sucrose and molasses.

3.2 QUALITY FACTORS

The Panela sugar should have the characteristic aroma and flavour of the sugarcane from where it is made and color ranging from dark brown to golden yellow. It should also be free from objectionable sensory characteristics.

The Philippines is also of the view that only the following main physical and chemical characteristics are essential and should be included. Some terms are changed for consistency with the Codex Standard for Sugars (Codex Stan 212-1999) and ICUMSA (International Commission for Uniform Methods of Sugar Analysis). Values are put in square brackets subject for submission of data from member countries and approved methods of analysis.

3.2.4 Physical and chemical characteristics

Panela will fulfil the conditions in tables 1 and 2

Table 1 Physical-chemical requirements for **solid lump** panela

| Requirement | Value | |
|--|-------|-------|
| | Min. | Max. |
| Moisture, mass fraction% Loss on drying, %, maximum | - | [9.0] |
| Conductivity Ash, mass fraction%, maximum | [0.8] | [-] |

| Requirement | Value | |
|---|---------|--------|
| | Min. | Max. |
| Non-reducing sugars, mass fraction% Polarization, °Z, minimum | [-] | [83.0] |
| Reducing sugars, mass fraction%, maximum | [5.5] | [-] |
| Proteins% (N x 6.25) | 0.2 | - |
| Potassium mg/100g | 100.0 | - |
| Calcium mg/100g | 10.0 | - |
| Phosphorous mg/100g | 5.0 | - |
| Iron mg/100g | 1.5 | - |
| Colorants | Absence | |

Table 2 Physical-chemical requirements for granulated amorphous panela

| Requirement | Value | |
|---|---------|--------|
| | Min. | Max. |
| Moisture, mass fraction% Loss on drying%, maximum | - | [5.0] |
| Conductivity Ash mass fraction%, maximum | [1.0] | [-] |
| Non-reducing sugars, mass fraction% Polarization, °Z, minimum | [-] | [93.0] |
| Reducing sugars, mass fraction%, maximum | [5.0] | [-] |
| Proteins% (N x 6.25) | 0.2 | - |
| Potassium mg/100g | 100.0 | - |
| Calcium mg/100g | 10.0 | - |
| Phosphorous mg/100g | 5.0 | - |
| Iron mg/100g | 1.5 | - |
| Colorants | Absence | |

Comments: For Polarization minimum values should be specified not the maximum values (since the higher the polarization value the better the quality of the sugar). For ash and reducing sugar, maximum levels should be specified.

4. FOOD ADDITIVES

In light of the recommendation for the amendment of Subcategory 11.1.3 of the GSFA, the Philippines maintains that this section should only make cross-reference to the GSFA instead of explicitly prescribing list of additives, to wit:

All food additives must meet the latest Codex General Standard for Food Additives (GSFA) (Codex Stan 192-1995).

5. CONTAMINANTS

The Philippines proposes the following sub-headings to this section, to wit:

5.1 HEAVY METALS

The product covered by this Standard shall comply with the maximum levels of the Codex General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

5.2 PESTICIDE RESIDUES

The products covered by this standard should comply with those maximum residue limits established by the Codex Alimentarius Commission.

6. FOREIGN MATTERS

The product should be free from foreign matters but may not be limited to dead insects, twigs and metals.

6-7. HYGIENE

It is recommended that the products covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1 – 1969), and other relevant Codex texts such as Codes of Hygienic Practice and codes of practice.

The products should comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21 – 1997).

7. 8. LABELLING

The Philippines opposes to the use of “Panela” as the primary name for this type of sugar. Until such time that the Codex Secretariat or Codex member countries resolve this, we provisionally therefore propose the following edits to the 7.1 Name of the Product”

7 8.1.1 The product name will be “Panela” followed by the ordinary name currently accepted in the country of retail sale or its equivalent name from in the country of origin.

7 8.1.2 In the case of flavoured or aromatized Panela, the labelling shall specify any aroma or flavouring characterizing the product. The food name “Panela” or its equivalent name from in the country of origin shall be accompanied by the following phrases: “aromatized with x” or “flavoured with x”. as the case may be.

If the addition of an aroma or flavouring alters the characteristic aroma or flavour of the product, the name of the food shall be accompanied by the terms “aromatized with x” or “flavoured with x”, as the case may be.

7. 8.1.3 The form of presentation (styles) shall be included as part of the name as follows:

- a) ~~“Solid Lump Panela”~~. Amorphous Panela
- b) ~~“Granulated Panela”~~. Lump Panela

7.4.4-c) Other forms of presentation - If the product is produced in accordance with the other forms provision (section 2.2.3), the label should contain in close proximity to the name of the product such additional words or phrases that will avoid misleading or confusing the consumer.

8- 9. METHODS OF ANALYSIS AND SAMPLING

See Volume 13 of the *Codex Alimentarius* and other relevant *International Commission for Uniform Methods of Sugar Analysis (ICUMSA)* methods.

Finally, in consonance with the above proposed changes on physical and chemical properties for panela, the Philippines hereby submits the following essential composition and quality factors including methods of analysis:

| Characteristics | Specification as Produced | | | Methods of Analysis |
|--------------------------------------|---------------------------|----------------|-------|---|
| | Powder Class A | Powder Class B | Lump | |
| Polarization ^o Z, minimum | 86.00 | 77.00 | 57.00 | ICUMSA GS1/2/3/9-1(2007) Polarimetry |
| Reducing Sugar,%, maximum | 7.50 | 12.00 | 28.00 | ICUMSA GS1/3/7-3 (2005) Lane and Eynon Constant Volume |
| Loss on drying,%, maximum | 3.5 | 4.2 | 2.0 | ICUMSA GS2/1/3/9-15(2007) Gravimetry |

| Characteristics | Specification as Produced | | | Methods of Analysis |
|----------------------------------|---------------------------|----------------|------|---|
| | Powder Class A | Powder Class B | Lump | |
| Conductivity Ash, %, maximum | 2.90 | 3.00 | 3.00 | ICUMSA GS1/3/4/7/8-13 (1994) Conductimetry |
| Insoluble Matter, mg/kg, maximum | GMP | GMP | GMP | |

UNITED STATES OF AMERICA / ÉTATS-UNIS D'AMÉRIQUE / ESTADOS UNIDOS DE AMÉRICA

The United States is pleased to submit the following comments in reply to CL 2011/25-CS on the Proposed Draft Standard for Panela in the Codex Committee on Sugars.

General Comments

While the United States has no specific objections to this standard, we question the general need for this standard. Additionally, this standard as currently drafted, may be excessively broad in scope by attempting to cover more than what is traditionally understood to be panela, by including artisanal products from many regions that vary in permitted composition according to local custom, and by attempting to include all possible forms and mixtures of panela with other flavors and colors. For example, We note that the footnote 1 to paragraph 4 of the background document, CX 5/10.2, and footnote 2 to the draft standard list a number of alternative names that are not necessarily "panela" although they are similar. Some may come from other sources. For example, jaggery is also variously defined as being made from palm sugars, date palms, etc., and possibly even coconut. Some definitions say that jaggery is from cane juice and gur is from palm sugar.

With respect to the reference to "Cocuto (Japan)", this product is usually spelled "kokuto". Kokuto, also known as "black sugar," is exclusively from Okinawa, Japan. The Japanese also refer to it as brown sugar, but it is mostly sold as solid rectangular cakes or chunks, making it appear to be similar to panela. It is not clear whether this is really the same product being defined as "panela" here. We therefore question inclusion of many of these names absent a clarification and definition of the terms as used in the countries to which they are native.

We note that throughout the draft standard for panela, the term "saccharose" is used to refer to "sucrose". We suggest that "saccharose" be changed to "sucrose" throughout the document. The term "sucrose" is the only common usage in English.

Specific Comments

We note that in paragraph 4 of the background document, it is proposed to amend the definition of subcategory 11.1.3 of the GSFA to "include the definition of 'panela' as 'sugarcane juice'..." We suggest that, since sugarcane juice by itself is not "panela", this should be reworded to read "include the definition of 'panela' as '**dried** sugarcane juice'..."

With respect to section 2.2.2 which describes a "granulated" style of panela, we question inclusion of this form. It is our understanding that the identifying characteristic of panela, jaggery, gur, raspadura, etc., is that they are typically presented in the form of a moist, formed mass. The process to make a granulated product is completely different than that to produce a firm moist mass from evaporation of cane juice as described in the definition. Granulated panela is far from that definition. We suggest that Colombia should clarify how common the granulated product is. Absent significant international trade in this product, we suggest removing the granulated form from the definition.

With respect to Section 2.2.3 which describes "Other forms of presentation, this provision which permits "any other presentation of the product," would appear to be unnecessary.

The subheadings in this section are unnecessary because they do not add anything that is not already inherent in a Codex standard.

With respect to Section 2.2 which defines "Forms of presentation", since the product definition in section 2.1 already specifies that panela is defined as the product "in any form or presentation..." and since there are questions about the value or usefulness of the various subcategories in this section as noted in comments 3 and 4 above, we suggest that Section 2.2 defining forms of presentation is unnecessary, does not add anything to the standard, and should be deleted in its entirety.

With respect to Section 3.2.1 which defines color, saying that it exists in "various colors" is misleading and could be confusing. The color of panela will always be in the range of light to dark brown or golden brown. We suggest that instead, the standard could say that:

3.2.1 Colour

Panela ~~may exist in various colours~~, is light to dark brown or golden brown in color depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process

Additionally, Colombia may wish to consider specifying an ICUMSA color range or a minimum color based on ICUMSA units.

With respect to Section 3.2.2 which defines flavor and aroma, we would expect the flavor and aroma of panela to be the natural, characterizing flavor of the underlying sugarcane juice without bad tastes caused by deterioration or absorption of foreign substances or any undesirable odors. We question how common flavored and aromatized panela actually is and the need to include it in the definition. We suggest not including it in the definition.

With respect to Section 3.2.4 which defines Physical and chemical characteristics, in Table 1, the term “Ashes” should be changed to “Ash”.

With respect to Section 3.2.4 which defines Physical and chemical characteristics, Table 1 specifies that for “Colorants” that there is an “Absence”. This is clearly incorrect because panela is characterized by a light to dark brown or golden brown in color due to the natural colorants. We suggest that the standard could be revised to indicate the “absence of **added** colorants” or that colorants are the ones naturally produced in processing. Additionally, the standard could specify an ICUMSA color range, or a minimum color based on ICUMSA units.

With respect to Section 3.2.4 which defines physical and chemical characteristics, Table 1 specifies that for Potassium, Calcium, Phosphorous, and Iron, there are no maximum amounts. We question the absence of maximum levels because if these elements (especially iron) are present at excessive levels, they will unfavorably impact the taste. We also question the source and importance of the minimum values specified in this table.

With respect to Section 3.2.4 which defines physical and chemical characteristics for granulated panela in Table 2, we suggest that this table be deleted, in addition to deleting the definition of granulated panela as a form of presentation.

With respect to Section 4.2 which defines anticaking agents for granulated panela, we suggest deleting this section in addition to deleting the definition of granulated panela as a form of presentation.

With respect to Section 4.3 which permits flavorings and food grade colorants for granulated panela, we specifically note that this provision is contrary to proposed Table 1 and Table 2 in that no added colorants are permitted in these tables. We also question whether adding flavorings is a common practice and note that some products such as gur, jaggery and kokuto are renowned for their “natural” composition. We suggest deleting this section in addition to deleting the definition of granulated panela as a form of presentation and in addition to deleting flavored and aromatized panela as a permitted “flavor and aroma” in section 3.2.2.

With respect to Section 7.1.1 we question the requirement that the name “panela” appear first on all of these unique products.

With respect to Section 7.1.2, 7.1.3, and 7.1.4 we suggest deleting these sections as outlined above.

With respect to Section 8 which specifies Methods of Analysis and Sampling, we question why ICUMSA methods are not used? Most of the sugar methods in the Codex Recommended Methods of Analysis and Sampling [Codex Stan 234-1999] are ICUMSA standards. ICUMSA standards are routinely updated and modernized. For example, for ash determinations, ICUMSA uses a conductimetric method, which is rapid and relatively easy as compared to the AOAC 900.02 gravimetry method specified here which is outdated and requires hours of time, very high temps, and special equipment. We recommend that whenever possible, ICUMSA methods of analysis should be used.

CEFS (COMITÉ EUROPÉEN DES FABRICANTS DE SUCRE)

In response to Codex document CL 2001/25-CS CEFS (Comité Européen des Fabricants de Sucre), on behalf of all European sugar producers, would like to provide comments on the PROPOSED DRAFT CODEX STANDARD FOR PANELA.

CEFS notes the decision of the 34th Session of the Codex Alimentarius Commission (CAC) to approve the elaboration of a worldwide STANDARD FOR PANELA as new work for the Codex Committee on Sugars (CCS). CCS will be working by correspondence only, following the uniform procedure for the elaboration of Codex standards and related texts as laid down in the Codex procedural manual. Whilst on this basis, CEFS would not oppose the establishment of a worldwide STANDARD FOR PANELA, CEFS does not support the inclusion of PANELA in subcategory 11.1.3. of the Codex Food Categorization System as laid down in the General Standard for Food Additives (GSFA). We thus explain below our reasoning and respectfully suggest considering an alternative option.

Food subcategory 11.1.3 of the GSFA (*soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar*) exclusively contains sugars covered by the Codex Standard for Sugars (Codex Stan 212-1999 (amended 2001)). Their technological need for the use of food additives is limited. According to the corresponding additive provisions laid down in the Codex Standard for Sugars and the GSFA, the only food additive authorized for use in Food Category 11.1.3. (*soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar*) is sulphites at a maximum level of 20 mg/kg, calculated as SO₂. However, as suggested in CL 2001/25-CS, PANELA seems to have substantially different technological needs for the use of food additives, especially with respect to the use of colours, acidity regulators, anticaking agents and flavourings.

Given the fact that according to the proposed DRAFT CODEX STANDARD FOR PANELA, a large number of food additives seem technologically required for this product, CEFS would see it more appropriate to align the product PANELA with the Food Category 11.4 (*other sugars and syrups (e.g., xylose, maple syrup, sugar toppings)*), as most of the food additives suggested in chapter 4 of the PROPOSED DRAFT STANDARD FOR PANELA are already authorised (or included in the Codex step procedure) for use in Food Category 11.4.

In addition to what is stated above, CEFS has the following comments on individual sections of the PROPOSED DRAFT CODEX STANDARD FOR PANELA.

Comments on section 2.1 (PRODUCT DEFINITION)

CEFS suggests clarifying the product definition proposed for PANELA. As currently drafted, the product definition leaves doubt on whether PANELA is merely dried sugarcane juice or whether other additional characteristic ingredients are added in order for the product PANELA to be complete (e.g., food colours, flavourings, etc.). If such other ingredients were indeed part of PANELA, this fact should be covered by the product definition in order to avoid potential confusion with sugars of the Codex Standard for Sugars, which do not contain such ingredients. In view of this, it might also be considered whether PANELA really belongs to Food Category 11 ("sweeteners, including honey") or would better fit in Food Category 5.0 ("confectionery").

Moreover, the mention in the definition of saccharose, glucose, fructose and minerals as being "constituent elements" is not clear. Indeed, since in section 3.2.4 on the physical and chemical characteristics for PANELA, a maximum content for non-reducing sugars and minimum contents for minerals (but also reducing sugars and proteins) are set, it would be relevant for the product definition to include information on whether minerals (but also reducing sugars and proteins) may be added to PANELA and whether reducing sugars may be intentionally generated by hydrolysis to meet the physical-chemical requirements of PANELA laid down in section 3.2.4.

Comment on subsection 2.2.3 (OTHER FORMS OF PRESENTATION)

CEFS questions the need to include the proposed subsection 2.2.3 on other forms of presentation in the standard, as this subsection is not clear and seem to unjustifiably broaden the scope of the PROPOSED DRAFT STANDARD FOR PANELA. Indeed, as it is CEFS' understanding that PANELA can only come in solid (incl. granulated) form, providing for additional potential forms of presentation seems unnecessary.

Comment on section 4 (FOOD ADDITIVES)

Phosphoric acid (INS 338) is not included in Table 3 of the GSFA (which gathers the additives that can be used in food in accordance with GMP). The maximum use level for phosphoric acid (subsection 4.1) should therefore be expressed as a numeric value.

Comment on section 8 (METHODS OF ANALYSIS AND SAMPLING)

CEFS would like to suggest the fact that, if available, ICUMSA (International Commission for Uniform Methods of Sugar Analysis) methods may be more suitable methods to perform the analyses of the components mentioned in table of section 8.

WORLD SUGAR RESEARCH ORGANISATION (WSRO)

The initial observation would be that a full standard definition of Panela should be agreed before its inclusion in the GSFA can be considered. Once a definition has been agreed, then the best method of incorporating it into the GSFA can be discussed.