



## Agenda Item 9

CX/ASIA 22/22/9  
August 2022

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**FAO/WHO COORDINATING COMMITTEE FOR ASIA**  
**Twenty-second Session**

**Virtual**  
**12, 13, 14, 17, 18 and 21 October 2022**

### **PROPOSED DRAFT REGIONAL STANDARD FOR COOKED RICE WRAPPED IN PLANT LEAVES**

(at Step 4)

(Prepared by the Electronic Working Group chaired by China)

Codex Members and Observers wishing to submit comments, at Step 3, on this proposed draft (Appendix I) should do so as instructed in CL 2022/54/OCS-ASIA available on the Codex webpage/Circular Letters 2022

## **INTRODUCTION**

1. At CCASIA20<sup>1</sup> held in September 2016, China presented the discussion paper/project document of Zongzi and many countries expressed their interest. CCASIA20 requested China to revise the discussion paper/project document for consideration at CCASIA21. At the request of CCASIA 20, following revisions were made:
  - (i) Additional information on the varieties of this product, its amenability to standardization, food safety concerns and impediments to trade had been provided;
  - (ii) The discussion paper had addressed all the information requested under “Criteria for establishment of work priorities”;
  - (iii) The picture and descriptions of Thailand’s similar product provided in Table 1 had been revised;
  - (iv) Some modifications had been made in product definition.
2. At CCASIA21<sup>2</sup> held in September 2019, China further explained that the product name “Zongzi” was conventional and could be used temporarily until a more generic product name was identified and all suggestions in this regard were welcomed. Different proposals on the name of the products i.e., “steamed rice wrapped in plant leaves”, “rice dumplings”, “steamed sticky rice wrapped in plant leaves”, and “Cooked glutinous rice wrapped in plant leaves” were considered.
3. CCASIA21 noted that: (i) the method of preparation for the product was not limited to steaming and other methods e.g., boiling, were also acceptable; and (ii) besides glutinous rice, the standard should also cover other types of rice.
4. CCASIA21 agreed to rename the product as “cooked rice wrapped in plant leaves”.
5. At CAC43<sup>3</sup> held virtually from September to November 2020, CAC43 approved the new work proposal on the development of a regional standard for cooked rice wrapped in plant leaves (Job No. N04-2020).
6. An EWG on cooked rice wrapped in plant leaves chaired by China, working in English was created to facilitate the progress of this project. The EWG worked by correspondence (email).

## **OBJECTIVE OF THE EWG**

7. The objective of this EWG was to prepare the proposed draft standard for circulation for comments at Step 3 and consideration at CCASIA22.

<sup>1</sup> REP17/ASIA paragraph 118

<sup>2</sup> REP20/ASIA paragraphs 104-112

<sup>3</sup> REP20/CAC paragraph 57 and Appendix V

## **PARTICIPATION**

8. In December 2020, the EWG invitation was circulated to Codex members and observers. Japan, the Republic of Korea, Indonesia, Thailand, the United States and International Frozen Foods Association (IFFA) registered to participate in the EWG (see Appendix II for participant list). The EWG chair also sent the invitation letter to the members via the Codex Secretariat and China contact point to encourage wider participation especially of those countries and regions who also produce and consume the same kind of products.

## **COMMENTS AND CONSULTATION**

9. China prepared the first draft of the standard and requested input through two rounds of comments. The first round of comments was started in May, 2021. Some members expressed that due to the COVID-19 pandemic, it was difficult to convene physical meetings with the industry and asked for late submissions, in response to which was agreed by the EWG chair agreed to postpone the deadline. During this round, Japan, the Republic of Korea, Thailand, and the United States, submitted their comments. The second round of comments was initiated in February 2022, and comments were received from Japan, the Republic of Korea, Thailand, and the United States of America.

## **DISCUSSION ON THE DRAFT STANDARD**

10. A complete comment template (in the order of clause and/or sub-clause) for this standard was established (see Appendix III for the first round of comments; Appendix IV for the second round). Each comment has been carefully considered and recommendations from the chair are also given in the template. Comments have been reflected in the draft, especially on the product definition, types, quality criteria, food additives, etc. Editorial changes and clarification of the English wording, as suggested by members, are also reflected.

### 2.1 Product definition

11. This draft standard allows for more inclusiveness and flexibility to include similar products in the region. It is noted that many products distributed in the Republic of Korea (lotus leaves rice) are not bundled up in the packaging process and final products manufactured in Korea are not bundled up or tied up with string but wrapped with plant leaves. Considering that similar product should be taken into account for flexibility, the product definition was amended accordingly.

### 2.3 Process Definition

12. As the freezing process is important to this standard, Section 2.3.3 Quick freezing process has been added to complete the information on the freezing process, which is also consistent with other Codex standards.

### 3 Essential composition and quality factors

13. Amendments have been made to include more ingredients, for example, the leaves and rice used for the product and to follow the terms used in the *Classification of Foods and Animal Feeds* (CXA 4-1989). One country suggested that existing Codex Standards needs to be referenced where possible in this part. According to the format of other Codex standards, no existing Codex standard is referenced in the Basic ingredients part, and it is unnecessary to do so according to the general format of the commodity standard.

### 3.2 Quality criteria

14. The original text has been rearranged into 3.2.1 General requirements and 3.2.2 Defects and Allowances. Moisture requirement has been deleted as suggested by US and Thailand, because it is a product that had been sterilized and frozen processed, so there is no need to determine the moisture content.

### 4 Food Additives

15. This section needs to have a reference the *General Standard for Food Additives* (GSFA, CXS 192-1995), Food Category and Table I, II or III. The prescription type listing of Food Additives can limit innovation and become a barrier to trade. The United States of America recommends using a general reference to the GSFA to allow greater flexibility in the use of food additives; moreover, if some food additives are decertified for use in this product or new ones are certified, the standard does not have to be revised. Thailand also proposed the amendment of the sentence to be consistent with other Codex standards. In view of this, the table of prescribed food additives has been replaced by a general reference to the GSFA.

### 8. Labeling

16. The reference of non-retail containers is added as *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021) has been adopted

#### 8.1 Name of the product

17. Examples of other names of product used in Asian countries, Zongzi, Chimaki, Ba- Jang, Khao Tom Mat, lotus leaf rice, Ketupat, Ma-chang etc., are added as a footnote in the draft. As the fillings of the product vary a lot, ranging from all sorts of meat and vegetables to seafood, mushrooms and even fruit, which also vary greatly from country to country, and also from region to region within a certain country, it is difficult to name the product with "Cooked Rice filled with [name of filling]". "Instruction for use" is not specified in this standard since the details regarding instructions for storage and use are provided in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).

#### 9. Methods of Analysis and Sampling

18. The method for extraction of oil has been added in order to be consistent with other Codex standards, for example, *Standard for instant noodles* (CXS 249-2006).

#### **CONCLUSION AND RECOMMENDATION**

19. Considering that almost all the submitted comments were properly addressed, the proposed draft standard for cooked rice wrapped in plant leaves is ready for submission to CCASIA22 for consideration at Step 4. CCASIA22 is invited to consider the proposed draft standard (see Appendix I), with a view to progress it through the Codex step procedure.

**PROPOSED DRAFT REGIONAL STANDARD FOR COOKED RICE WRAPPED IN PLANT LEAVES****1. Scope**

This standard applies to products as defined in Section 2, which are intended for direct consumption.

**2. Description****2.1 Product definition**

Cooked Rice Wrapped in Plant Leaves is prepared from rice, to which meat, poultry, eggs, fruits and vegetables, beans, nuts, and their derived products etc. may or may not be added (the filling), with the filling being completely wrapped with plant leaves (indocalamus leaves, reed leaves, banana leaves, lotus leaves etc.). The product may/may not be bundled up before steaming or boiling and packaging.

**2.2 Product types****2.2.1 Quick frozen product**

The product that is steamed or cooked before being quickly frozen and stored in freezing temperature.

**2.2.2 Commercial sterilized product**

The product that is sterilized to meet the requirements of commercial sterility.

**2.3 Process definition****2.3.1 Plant leaves**

The plant leaves as described in Section 2.1 should be carefully selected, soaked, cleaned and drained before using. The leaves shall not be soaked in chemical reagents to change their colour.

**2.3.2 Cooking**

The product may be cooked using steam and other appropriate cooking methods and/or under certain pressure, temperature and time, before being quickly frozen.

**2.3.3 Quick-freezing process**

The quick-frozen product (Section 2.2.1) is the product subject to a freezing process as outlined in the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CXS 8 – 1976) In particular this freezing operation shall be carried out in such a way that the range of temperature of maximum crystallization is passed quickly. The quick-freezing process shall not be regarded as complete unless and until the product temperature has reached  $-18^{\circ}\text{C}$  at the thermal center after thermal stabilization. The recognized practice of repacking quick frozen products under temperature-controlled conditions is permitted.

**2.3.4 Vacuum packing**

The commercial sterilized product as described in Section 2.2.2 shall be processed in an appropriate manner, before or after being sealed in a container, so as to prevent spoilage and to ensure product stability in normal storage conditions at ambient temperature. The product shall not leak or swell after sterilization.

**3. Essential composition and quality factors****3.1 Ingredients****3.1.1 Basic ingredients**

- a) glutinous rice, rice, millet, oat, barley, or etc.
- b) plant leaves

**3.1.2 Optional ingredients**

- a) fruits and vegetables (including edible fungi, pulses and legume vegetables)
- b) nuts and seeds
- c) preserved fruits
- d) edible fungi
- e) meat
- f) aquatic products

- g) eggs
- h) edible fats and oil
- i) beans
- j) derived products of a) to i)
- k) sugar
- l) edible salt
- m) spices and culinary herbs
- n) seasonings
- o) other ingredients as appropriate

## **3.2 Quality criteria**

### **3.2.1 Quality factors**

Products with animal and nuts derived fillings shall meet the Peroxide value  $\leq 19.7\text{mEq/kg}$ .

### **3.2.2 General requirements**

Cooked rice wrapped in plant leaves should have the following qualities:

- have their appropriate shape;
- be uniform in size;
- be properly wrapped;
- have the characteristic smell and taste of the basic and/or optional ingredients.

### **3.2.3 Defects and Allowances**

Cooked rice wrapped in plant leaves should be substantially free from following defects:

- broken wrapper and leaking filling;
- foreign taste;
- visible foreign matters outside and inside the product.

## **3.3 Classification of “defectives”**

A container that fails to meet the quality requirements set out in Section 3.2 shall be considered a “defective”.

## **3.4. Lot acceptance**

A lot shall be considered as meeting the requirements of this standard when:

- the number of “defectives” as defined in Section 3.3 does not exceed the acceptance number (c) of an appropriate sampling plan with an AQL of 6.5.
- the number of “defectives” as defined in Section 7.1.1 does not exceed the acceptance number (c) of an appropriate sampling plan with an AQL of 6.5.

## **4. Food additives**

Acidity regulators, antioxidants, colors, preservatives and stabilizers used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CXS 192-1995) in food category 06.7 “Pre-cooked or processed rice products, including rice cakes (Oriental type only)” and certain acidity regulators, antioxidants, colors, preservatives, stabilizers, emulsifiers, flavor enhancers and thickeners, as indicated in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in foods conforming to this Standard.

## **5. Contaminants**

5.1 The product covered by this standard shall comply with the maximum levels of the *General Standard for Contaminants and Toxins in Food and Feed* (CXS 193-1995).

5.2 The products covered by this standard shall comply with the maximum residue limits for pesticides established by the Codex Alimentarius Commission.

## **6. Hygiene**

6.1 It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the *General Principles of Food Hygiene* (CXC 1-1969), and other

Codes of Practice recommended by the Codex Alimentarius Commission which are relevant to this product.

6.2 The product should comply with any microbiological criteria established in accordance with the Principles and *Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CXG 21-1997).

6.3 Quick frozen product should comply with the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CXC 8-1976).

6.4 Commercial sterilized products should meet the requirements of commercial sterility.

## **7. Weights and measures**

### **7.1 Net weight**

The weight of the product covered by the provisions of this Standard shall be indicated in accordance with the *General Standard for the Labeling of Prepackaged Foods* (CXS 1-1985).

#### **7.1.1 Classification of “defectives”**

A container that fails to meet the net weight declared on the label should be considered as a “defective”.

## **8. Labelling**

The product covered by the provisions of this Standard shall be labelled in accordance with the *General Standard for the Labeling of Prepackaged Foods* (CXS 1-1985). The labelling of non-retail containers should be in accordance with the *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021). In addition, the following specific provisions apply:

### **8.1 Name of the product**

The name of the product shall be “Cooked rice wrapped in plant leaves”. The product shall be labelled with the corresponding name described in Section 2.2. Other names<sup>4</sup> may be used in accordance with the law and custom of the country in which the product is sold and in such a manner as to not mislead consumers.

## **9. Methods of analysis and sampling**

For checking the compliance with this standard, the methods of analysis and sampling contained in the *Recommended Methods of Analysis and Sampling* (CXS 234-1999) relevant to the provisions in this standard, shall be used.

### **9.1 Determination of peroxide value<sup>5</sup>**

#### **9.1.1 Extraction of oils from the product**

##### **9.1.1.1 Apparatus**

- (a) Rotary evaporator
- (b) Water bath

##### **9.1.1.2 Extraction**

Remove the product package and plant leaves, etc., take out the edible part of the representative sample, crush it and put it in a homogenizer or glass mortar, and grind it continuously to make the sample fully mashed and mixed well, and then put it in the wide-mouth bottle, and add 2 to 3 times the sample volume of petroleum ether (boiling range: 30°C-60°C). After fully mixing, stopper the bottle and leave for more than 12 hours. Filter all the solution with a funnel filled with anhydrous sodium sulfate into a round-bottom flask. Rinse the residue in the wide-mouth bottle with petroleum ether. Repeat the filtration once with a new anhydrous sodium sulfate funnel, if the filtrate is not clear enough. Evaporate the petroleum ether in the round-bottom flask under reduced pressure on a rotary evaporator at below 40°C, and the residue is the test sample. A sufficient number of representative samples should be selected to ensure that not less than 8 grams of the test sample can be obtained. The test sample should be tested as soon as possible.

##### **9.1.2 Determination**

According to ISO 3960 or AOCS Cd 8b-90 (03)

<sup>4</sup> Other names for example, Zongzi, Chimaki, Ba-Jang, Khao Tom Mat, lotus leaf rice, Ketupat, Ma-chang and etc.

<sup>5</sup> Section 9.1 will be considered by CCMAS and this section will be removed from the final published standard.

**EWG on Regional Standard for Cooked Rice Wrapped in Plant Leaves****LIST OF PARTICIPANTS****MEMBERS NATIONS AND ORGANIZATIONS****CHINA**

Ms Lijun ZHANG (EWG Chair, Official Representative)

Vice chairwomen

China General Chamber of Commerce  
Beijing

Mr Zhen LU (EWG Secretary)

Section Director  
China General Chamber of Commerce  
Beijing

Mr Xiangbo LI

Vice Secretary General

China General Chamber of Commerce  
Beijing

Mr Zhenyu LIU

Director General

China General Chamber of Commerce  
Beijing

**INDONESIA**

Ms. Nuri Wulansari

Technical officer in Directorate of Standard Development for Agro, Chemistry, Health and Halal

National Standardization Agency of Indonesia

**JAPAN**

Dr Keiji Momono (Official Representative)  
Deputy Director  
Food Manufacture Affairs Division, New Business and Food Industry Department, Minister's Secretariat, Ministry of Agriculture, Forestry and Fisheries of

Mr Masanori Natsuka

Section Chief

Food Manufacture Affairs Division, New Business and Food Industry Department, Minister's Secretariat

Ministry of Agriculture, Forestry and Fisheries of

Dr Yoshihiro Chuda

Deputy Director

Food Manufacture Affairs Division, New Business and Food Industry Department, Minister's Secretariat

Ministry of Agriculture, Forestry and Fisheries of

**REPUBLIC OF KOREA**

Codex contact point (Official Representative)

Ministry of Agriculture Food and Rural Affairs

Shinwon KANG

SPS (OIE, IPPC, CODEX) Researcher, Food Industry Policy Division

Ministry of Agriculture, Food and Rural Affairs (MAFRA)

Yoye Yu

IPPC, CODEX Researcher, Food Industry Policy Division

Ministry of Agriculture, Food and Rural Affairs (MAFRA)

JIEUN LEE

CODEX researcher, Food Safety Policy Division  
Ministry of Food and Drug Safety (MFDS)

Dr. You-Shin Shim

Principal Research Scientist, Food Standard Research Center

Korea Food Research Institute (KFRI)

**THAILAND**

Ms. Virachnee Lohachoompol (Official Representative)

Standards Officer

National Bureau of Agricultural Commodity and Food Standards (ACFS), Ministry of Agriculture and Cooperatives

Ms. Natthakarn Nammakuna (Official Representative)

Standards Officer

National Bureau of Agricultural Commodity and Food Standards (ACFS), Ministry of Agriculture and Cooperatives

U.S. Food and Drug Administration

Doreen Chen-Moulec  
International Issues Analyst/ US Codex office/USDA  
U.S. Food and Drug Administration

**PARTICIPANTS OUTSIDE ASIAN REGION**

**UNITED STATES OF AMERICA**

Dorian LaFond  
International Standards Coordinator/ AMS Specialty Crops Program

**OBSERVER**

Lory Reveil  
Director, Regulatory and Scientific Affairs  
International Frozen Foods Association (IFFA)



**Template for comments and recommendations from the EWG chair The 1<sup>st</sup> round for *Cooked Rice Wrapped in Plant Leaves***

*in the order of clause/subclause*

No.	Country	Clause/ Subclause	Comments	Proposed change	Recommendations from chair
1	The Republic of Korea	2.1 Product definition	Many products distributed in the Republic of Korea (lotus leaves rice) are not bundled up in the packaging process. Moreover, lotus leaves rice could be heated before wrapping process.	The product is prepared from rice especially glutinous rice, adding or not adding meat, poultry, eggs, fruits and vegetables and their derived products, beans, nuts, etc. as the filling that should be <b>completely</b> wrapped with plant leaves. The product <b>should may/may not</b> be bundled up before steaming or boiling, and packaging.	Noted and carefully discussed.  Similar products in other Asian countries are mostly wrapped and bundled up to prevent the loosing plant leaves deforming the product during bundling process. Complete wrapping and bundling process secure food safety for this product. Lotus leaf rice does not fall into the product specified in this standard.
2	Thailand	2.1 Product definition	The product definition should include examples of plant leaves.	The product is prepared from rice especially glutinous rice, adding or not adding meat, poultry, eggs, fruits and vegetables and their derived products, beans, nuts, etc. as the filling that should be completely wrapped with plant leaves (indocalamus leaves, reed leaves, banana leaves, lotus leaves, and etc.). The product should be bundled up before steaming or boiling, and packaging.	Accepted and revised.
3	Thailand	2.2	The products from different processes are not “product classification”. The words “product types” should be used instead.	<b>2.2 Product types</b>	Accepted and revised.
4	Thailand	2.2	To provide inclusiveness, flexibility, and practicality to food business operators. The processing technologies should not be limited to	2.2.1 <b>Frozen product</b>  The products that are quickly frozen and kept frozen.  2.2.2 <b>Commercial sterilized product</b>	For 2.2.1: Noted and considered  There is no code practice for processing and handling “frozen products” which is difficult to define, while quick-frozen product can comply

			only quick-frozen or vacuum packaged products.	The products that are sterilized to meet the requirements of commercial sterility.	with the <i>Code of Practice for the Processing and Handling of Quick Frozen Foods (CXC 8-1976)</i> . There are a large number of quick-frozen type of products, therefore it is necessary to keep this type.  For 2.2.2: has been revised.
5	The Republic of Korea	2.2.1	<p>The Republic of Korea would like to suggest to delete 'Quick' because Quick frozen cooked rice wrapped in plant leaves are not manufactured much in the Republic of Korea according to the result of research on distributed products. Since quick freezing process is related to the quality, not the safety, of the product, it is not necessary.</p> <p>The presented product classification in the draft is not clear because it includes both aspects of the distribution process (2.2.1) and packaging (2.2.2). Therefore product classification should be re-established based on the same criteria(e.g. frozen product / non-frozen product).</p> <p>Please consider that the lotus leaves rice products distributed in Korea could be packaged by normal package (PE package including or not including plastic tray, not sterilized and not vacuum packaged).</p>	<p><b>2.2 Product classification</b></p> <p>[2.2.1 Quick-frozen product]</p> <p>[The products that are steamed or cooked before quickly frozen and stored in freezing temperature.]</p>	See comment NO.4
6	Thailand	2.3	Detail in Sections 2.3.2 and 2.3.3 are already stated in Section 2.1 Product definition.	<p><b>2.3 Process definition</b></p> <p>2.3.1 The plant leaves should be carefully selected, soaked, cleaned and drained before using. The leaves shall not be soaked by chemical reagents to enhance their color.</p>	Accepted and revised.

				<p>2.3.4 The freezing process shall not be regarded as complete unless and until the temperature of frozen product as described in Section 2.2.1 has reached -18°C at the thermal center.</p> <p>2.3.5 The commercial sterilized product as described in Section 2.2.2 should not leak or swell after sterilization.</p>	
7	The Republic of Korea	2.3.2	<del>completely, before bundled up.</del>	2.3.2 The rice and fillings should be <del>completely</del> -wrapped by plant leaves- <del>before bundled up.</del>	See Comment NO.1
8	The Republic of Korea	2.3.3	The meaning of 'different heating methods' is unclear.	2.3.3 The products should be steamed or boiled <del>with different heating methods</del> under certain pressure, temperature and time.	Accepted and revised
9	The Republic of Korea	2.3.4	2.3.4 The Republic of Korea proposes to delete 'Quick' because Quick frozen cooked rice wrapped in plant leaves are not manufactured much in the Republic of Korea according to the result of research on distributed products. Also this provision shall be discussed after '2.2 Product classification' is clearly established.	<del>2.3.4 The quick-freezing process shall not be regarded as complete unless and until the temperature of quick-frozen product as described in Section 2.2.1 has reached -18°C at the thermal center.]</del>	See comment NO.4
10	The Republic of Korea	2.3.5	2.3.5 This provision shall be discussed after 'Product classification' is clearly established.	<p><del>2.3.5 The vacuum-packaged product as described in Section 2.2.2 should not leak or swell after vacuum sterilizing.</del></p> <p>2.3.5 The commercial sterilized product as described in Section 2.2.2 should not leak or swell after sterilization.</p>	Accepted and revised.
11	Thailand	3.1	For "a)", examples of plant leaves are not an ingredient, it should be moved to Section 2.1 Product definition. The other amendments are for editorial purpose.	<p><b>3.1 Basic ingredients</b></p> <p>The ingredients include but are not limited to:</p>	Accepted and revised.

				<ul style="list-style-type: none"> <li>b) glutinous rice, rice, millet, and etc.;</li> <li>c) water;</li> <li>d) fruits and vegetables;</li> <li>e) nuts;</li> <li>f) preserved fruits;</li> <li>g) edible fungi;</li> <li>h) meat i) aquatic products;</li> <li>j) eggs</li> <li>k) edible fat and vegetable oil;</li> <li>l) beans</li> <li>m) derived products of d) – l)</li> <li>n) sugar;</li> <li>o) edible salt;</li> <li>p) spices and seasonings;</li> <li>q) other ingredients as appropriate;</li> </ul>	
12	The Republic of Korea	3.1、 3.2	For ensuring consistency with other commodity standards, two types of ingredients need to be listed: basic ingredients and optional ingredients.	<p><b>3.1 Basic ingredients</b></p> <p><del>The ingredients include but are not limited to:</del></p> <ul style="list-style-type: none"> <li>a) indocalamus leaves, reed leaves, banana leaves, lotus leaves, <del>and/or</del> etc.;</li> <li>b) glutinous rice, rice, millet, <del>oat, barley and/or</del> etc.;</li> <li>c) water;</li> </ul> <p><b>3.2 Optional ingredients</b></p> <ul style="list-style-type: none"> <li><del>d</del>a) fruits and vegetables;</li> <li><del>e</del>b) nuts;</li> <li><del>f</del>c) preserved fruits;</li> </ul>	Accepted and revised accordingly.

				<p>g) edible fungi;</p> <p>h) meat and derived products;</p> <p>i) aquatic products;</p> <p>j) eggs and derived products;</p> <p>k) vegetable oil;</p> <p>l) sugar;</p> <p>m) edible salt;</p> <p>n) spices and seasonings;</p> <p>o) edible oil and fat products;</p> <p>p) soybeans and derived products;</p> <p>q) other ingredients as appropriate;</p>	
13	Thailand	3.2	<p>We would like to ask for a clarification of the issues as follows:</p> <p>1) What does it mean by the words “visible foreign bodies”? Also, please provide some examples.</p> <p>What is the basis or justification of the peroxide value? If the Peroxide value is one of quality criteria, the method of analysis of peroxide value should be included in Section 9. Methods of analysis and sampling.</p>		<p>“visible foreign bodies” refers to “visible foreign matter”</p> <p>Peroxide value is the most commonly used assay for measuring the state of oxidation in fats and oils and its value measures the oxidative rancidity or degree of oxidation of the fat/oil.</p> <p>Because some fillings contain meat and meat products, nuts and other oil-riching ingredients, it is necessary to measure the peroxide value.</p>
14	The Republic of Korea	3.2.1	<p>It is considered that moisture content is appropriate as a quality factor for cooked rice wrapped in plant leaves. To set detailed value, further discussion is needed.</p> <p>Republic of Korea believes that peroxide value can be used to determine about degree of freshness for ingredients such as animal derived</p>	<p>3.2.1 Quality Factors</p> <p>(a) Moisture --%</p> <p>(b) Peroxide value <math>\leq 0.25</math> g/100 g (limited to products with animal derived fillings or nuts as major ingredients)</p> <p>3.2.2 The products specified in this standard should have their appropriate</p>	<p>Accepted and added.</p> <p><b>The value of moisture content has been added. Further discussion is needed and your opinions are sincerely welcomed.</b></p> <p>Peroxide value is the most commonly used assay for measuring the state of</p>


			<p>fillings or nuts. However, the peroxide values of lipids extracts from rice bran and animal derived fillings or nuts can be determined at the same time. Therefore, it is difficult to determine of the freshness of animal derived fillings or nuts. The scientific basis needs to be provided to determine the peroxide value.</p>	<p>shape, be uniform in size, be wrapped and free from leakage, have the smell and taste of the product, be free from foreign taste, and be free from visible foreign matters outside and inside the product.</p>	<p>oxidation in fats and oils and its value measures the oxidative rancidity or degree of oxidation of the fat/oil.</p> <p>Because some fillings contain meat and meat products, nuts and other oil-riching ingredients, it is necessary to measure the peroxide value.</p>
15	Thailand	4	<p>According to the General Standard for Food Additives (CXS 192-1995), Aspartame is not allowed to use with food category 16.0 Prepared foods. Also, we would like to propose China to reconsider the usage of this food additive in order to be in line with the CXS 192-1995.</p>		Accepted and deleted.
16	The Republic of Korea	6 Hygiene	<p>References to quick frozen products and vacuum packaged products shall not be specified in the draft until 'Product classification' is clearly established.</p> <p>[Quick-frozen product should comply with the <i>Code of Practice for the Processing and Handling of Quick Frozen Foods (CXC 8-1976)</i>]</p> <p>[Vacuum-packaged products should meet the requirements of commercial sterility.]</p>		<p>Noted</p> <p>See Comment NO.4</p>
17	Thailand	8.2、 8.3	<p>We would like to propose the deletion of "Section 8.2 Storage" and "Sections 8.3 Other" since the detail about instruction of storage and edible method are in the <i>General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)</i>.</p>		Accepted

18	The Republic of Korea	<b>9 Methods of Analysis and Sampling</b>	When 'Quality factor' for cooked rice wrapped in plant leaves is established, appropriate methods of analysis needs to be specified.		Accepted
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**Template for comments and recommendations from the EWG chair The 2<sup>nd</sup> round for *Cooked Rice Wrapped in Plant Leaves***  
*in the order of clause/subclause*

No.	Country	Clause	Comments	Proposed change	Recommendations from chair
1	Thailand	2.1 Product definition	<u>Cooked Rice Wrapped in Plant Leaves</u> The product is prepared from rice especially glutinous rice, .....	<u>Cooked Rice Wrapped in Plant Leaves</u> The product is prepared from rice especially glutinous rice, .....	Accepted. The text has been amended accordingly.
2	US	2.1 Product definition	<u>Issue &amp; Rationale:</u> The word “especially” is confusing. If only glutinous rice is used, then it should be clear. This section also needs to clarify that the cooked rice grains are pressed together to functions as a dough with or without fillings etc.	<u>Proposal:</u> The product is prepared from cooked or semi-cooked glutinous rice pressed together with or without fillings of meat, poultry, eggs, fruits, vegetables, beans, nuts and their derived products. When fillings are used, they must be completely wrapped in the glutenous rice. The product should be completely wrapped with plant leaves and bundled up before cooking and packaging.	Accepted. “especially” has been deleted as this may be confusing.
3	The Republic of Korea	2.1 Product definition	The product <b>should</b> be bundled up before steaming or boiling, and packaging. [Rationale] Many products manufactured in Korea are wrapped with plant leaves after steaming or boiling. Furthermore, final products manufactured in Korea are not bundled up or tied up with string but wrapped with plant leaves. Main point of CCASIA to include similar products in the region should be taken into account in developing CODEX standards. In addition, we would like Chair of eWG to provide detailed definition of “completely wrapped” and “bundled up”.	The product <b>may</b> be bundled up before steaming or boiling, and packaging.	Considering that many final products manufactured in Korea are not bundled up or tied up with string but wrapped with plant leaves and considering that similar products should be taken into account, the word “should” has been amended to “may/may not” to make the standard more inclusive.



					 <p>Photo 1      Photo 2</p> <p>Photo 3      Photo 4</p> <p>Photo 3 and 4 are an example of completely wrapped, which means that the rice and fillings are totally wrapped into the plant leaves. "Bundled up" means that the wrapped product be tied up by a string, cotton thread and etc.</p>
4	US	2.2 Product Types	<p><u>Issue &amp; Rationale:</u> The product types should be defined.</p>	<p><u>Proposal:</u></p> <p><b>2.2 Types</b></p> <p><b>2.2.1</b> Cooked Rice Wrapped in Plant Leaves are of the following styles</p> <p><b>2.2.1.1</b> Partially cooked- This product is partially cooked with or without fillings and needs to complete cooking before consumption.</p> <p><b>2.1.1.2 Fully</b> cooked -This product that is fully cooked with or without fillings and only needs to be reheated before consumption.</p>	<p>The product type here is defined by processing technology into quick frozen product and commercial sterilized product. This proposed types make it difficult to define the process definition, and quality criteria. Considering this proposed classification of product types is irrelevant, it is decided to retain the original text.</p>
5	Thailand	2.3 Process definition	<p>Rationale: The addition is to complete the information on quick-freezing and commercial sterilized processes which are important for Cooked Rice Wrapped in Plant Leaves. Also, the proposed text</p>	<p><u>2.3.4 The quick-freezing product as described in Section 2.2.1 is the product subject to a freezing process in appropriate equipment and complying with the conditions laid down hereafter. This freezing operation shall be carried out in such a way</u></p>	<p>Accepted. The text has been amended accordingly.</p>


			<p>is in line with the Standard for Quick Frozen Vegetables (CXS 320-2015) and Standard for Certain Canned Fruits (CXS 319-2015).</p>	<p><u>that the range of temperature of maximum crystallization is passed quickly. The quick freezing process shall not be regarded as complete unless and until the product temperature has reached – 18°C at the thermal centre after thermal stabilization. The recognized practice of repacking quick frozen products under temperature controlled conditions is permitted.</u></p> <p><u>2.3.5 The commercial sterilized product as described in Section 2.2.2 shall be processed in an appropriate manner, before or after being sealed in a container, so as to prevent spoilage and to ensure product stability in normal storage conditions at ambient temperature. The product shall not leak or swell after sterilization.</u></p>	
6	US	2.2&2.3	<p><u>Issue &amp; Rationale:</u></p> <p>The current text in section 2.2 Product Types belong to Section 2.3 Process Definition therefore the text is moved there.</p>	<p><u>Proposal:</u></p> <p><b>2.3 General Requirements</b></p> <p><b>2.3.1 Wrapping in plant leaves</b></p> <p>The plant leaves as described in Section 3.1.a should be carefully selected, soaked, cleaned and drained before using. The leaves shall not be soaked by chemical reagents to enhance their color. The rice and fillings should be completely wrapped by plant leaves before bundled up.</p> <p><b>2.3.2 Wrapping</b></p> <p>The rice with or without fillings as <u>described in Section 3.1</u> should be completely wrapped by plant leaves before being bundled up.</p> <p><b>2.3.3 Cooking and freezing</b></p> <p>The products may be <i>partially or fully cooked</i> using steam and other appropriate cooking methods <b>and/or</b> under certain pressure, temperature and time, before quickly frozen. The quick-freezing process shall not be regarded as complete until the</p>	<p>Comprehensively considering US and Thailand's comments, this part has been amended as proposed. Please refer to the draft.</p>

				product as described in Section 2.2.1 has reached - 18°C at the thermal center. <b>2.3.4 Vacuum Packing</b> The products that should be vacuum-packaged and sterilized to meet the requirements of commercial sterility. The vacuum-packaged product as described in Section 2.2.2 should not leak or swell after vacuum sterilizing	
7	Japan	2.3.2	The rice and fillings should be completely wrapped by plant leaves before bundled up.	The rice and fillings should be completely wrapped <b>in</b> plant leaves before bundled up.	This may not be an editorial mistake.
8	US	3 Essential composition and quality factors	<b>Issue &amp; Rationale:</b> This section should indicate what are the Basic/essential and the Optional ingredients. Because Cooked Rice Wrapped in Plant Leaves can be traded with or without fillings; the fillings and their derived products are optional ingredients. This section should also include references to existing Codex standard when they exist for both basic and optional ingredients.  Salt can be a basic/essential ingredient in Cooked Rice Wrapped in Plant Leaves without fillings; however, it can be an optional ingredient in Cooked Rice Wrapped in Plant Leaves when it is not added to the rice but to the filling.	<b>Proposal:</b> <b>3.1 Composition</b> <b>3.1.1 Basic/Essential ingredients</b> a) indocalamus leaves, reed leaves, banana leaves, lotus leaves, and etc. b) semi-cooked or fully cooked glutinous rice, rice- Codex Standard for Rice (CXS 198-1995Amd.2019). c) water d) salt (Codex Standard for Food Grade Salt (CXS 150-1985) amd. 2012) <b>3.1.2 Optional Ingredients</b> Optional ingredients include the following and their derived products: a) fruits and vegetables b) nuts. c) preserved fruits d) edible fungi; (Codex Standard for Edible Fungi and Fungus Products (CXS 38 -1981 and in Codex Standard for Dried Edible	Thank you for your kind advise on this part. According to the format of other Codex standards, no existing Codex standard is referenced in this part, and in view of the general format of the commodity standard, it is unnecessary to do so.

				<p>Fungi (CXS 39-1981))</p> <p>e) meat</p> <p>f) aquatic products</p> <p>g) eggs</p> <p>h) vegetable oil; (Codex Standard for Named Vegetable Oils (CXS 210-1999) amd. 2019)</p> <p>i) sugar; (Codex Standard for Sugar (CXS 212- 1999)amd.2019</p> <p>j) edible salt; (Codex Standard for Food Grade Salt (CXS 150-1985) amd. 2012)</p> <p>k) spices and seasonings</p> <p>l) edible oil and fat products</p> <p>m) soybeans</p> <p>n) millet, oats and barley</p> <p>o) other ingredients as appropriate</p>	
9	Thailand	3.1 Basic ingredients	<p>The item a) and c) should be deleted.</p> <p><b>Rationale:</b> Leaves and water are not ingredients of the product. Leaves are only used for wrapping. Also, water is used for soaking the rice. Normally, it is not specified as ingredient.</p>		Accepted. The item a) and c) have be deleted.
10	Thailand	3.2 Optional ingredients	<p>For a), b), m), Thailand would like to amend the text as follows:</p> <p>“a) fruits and, vegetables (<u>including edible fungi, pulses and legume vegetables</u>)</p> <p>b) nuts <u>and seeds</u></p> <p>h) edible fats <u>and vegetable oils</u></p>	<p>“a) fruits and, vegetables (<u>including edible fungi, pulses and legume vegetables</u>)</p> <p>b) nuts <u>and seeds</u></p> <p>h) edible fats <u>and vegetable oils</u></p> <p>m) spices and <u>culinary herbs</u> <del>seasonings</del></p> <p>n) <u>seasonings</u></p>	Accepted. This part has been amended accordingly.

			<p>m) spices and <u>culinary herbs seasonings</u></p> <p>n) <u>seasonings</u></p> <p><b>Rationale:</b> The amendment is to include some ingredients and follow the terms used by the Codex Classification of Foods and Animal Feeds:</p>		
11	Thailand	3.2.1 Quality factors	<p>- Thailand would like to delete a) Moisture <math>\leq 55\%</math> because it is a product that had been sterilized and frozen processed. Therefore, there is no need to determine the moisture content.</p> <p>- For b) Peroxide value <math>\leq 0.25</math> g/100 g, Thailand would like to ask for a clarification from China about the unit for Peroxide value. For our understanding, the unit related to methods of analysis stated in Section 9.1 is mEq/kg.</p>		<p>Accepted. Moisture requirement has been deleted as the product is frozen processed.</p> <p>The unit for Peroxide value has been converted into <math>\leq</math> mEq/kg for consistency.</p>
12	US	3.2.1.a Moisture	<p><u>Issue &amp; Rationale:</u> The minimum moisture of <math>\leq 55</math> is irrelevant because i). the product can be re-heated in hot water and the moisture reconstituted, and ii). Low moisture can be used to as a means of food safety and quality after productions. Therefore, it is recommended to delete the moisture requirement.</p>	Therefore, it is recommended to delete the moisture requirement.	Accepted. Moisture requirement has been deleted accordingly.
13	US	3.2.1.b Peroxide Value	<p><u>Issue &amp; Rationale:</u> Sentence structure</p> <p>Products with animal and nuts derived fillings shall meet the Peroxide value <math>\leq 0.25</math> g/100 g</p>	Products with animal and nuts derived fillings shall meet the Peroxide value $\leq 0.25$ g/100 g	Accepted. This sentence has been restructured accordingly.
14	Thailand	3.2.2	Thailand would like to propose adding subsection under Section 3.2 Quality Criteria which are 3.2.2 General requirements and 3.2.3 Defects and Allowances	<p><b>3.2.2 General requirements</b> <del>The products specified in this Standard should:</del></p> <p>Cooked rice wrapped in plant leaves should have the following qualities:</p>	Accepted. The proposed text has been added and rearranged as Thailand suggested.

				<p>—have their appropriate shape;                  —be uniform in size,                  —be properly tied,                  —be completely wrapped and free from leakage;                  —have the smell and taste of the product, free from foreign taste;                  —be free from visible foreign matters outside and inside the product.</p> <p><b>3.2.3 Defects and Allowances</b></p> <p><u>Cooked rice wrapped in plant leaves should be substantially free from following defects:</u></p> <p>— free from leakage;                  — free from foreign taste;                  — free from visible foreign matters outside and inside the product.</p>	
15	The Republic of Korea	3.2.2	<p>—be properly tied,                  In addition, the products may be properly tied.</p> <p>[Rationale]                  In Korea, final products are not bundled up or tied up with string but wrapped with plant leaves.</p> <p>We would like Chair of eWG to provide detailed definition of “completely wrapped” and “free from leakage”</p>	<p>In addition, the products may be properly tied.</p>	<p>“—be properly tied” in this part has been deleted as Section 2.1 indicates that “The product may be bundled up before steaming or boiling, and packaging.”</p> <p>As “free from leakage” may be misleading, it has been amended to “free from broken wrapper and filling leaking” to make it clear.</p>

					 <p>Photo 1      Photo 2</p> <p>Photo 3      Photo 4</p> <p>It can be seen from Photo 4 that the final product is completely wrapped without any leakage of the fillings. It is noted that in Korea, final products are not bundled up or tied up with string but wrapped with plant leaves.</p> <p>(Photos are for reference only. Source: <a href="https://thewoksoflife.com/zongzi-cantonese-style/">https://thewoksoflife.com/zongzi-cantonese-style/</a>)</p>
16	US	3.2.2	<p>3.2.2 The products specified in this Standard should:</p> <ul style="list-style-type: none"> <li>- have the smell and taste of the product, free from foreign taste.</li> </ul> <p><u>Issue &amp; Rationale:</u> It is recommended to revise this requirement that takes into consideration both the Basic essential composition and optional ingredients.</p>	<p><u>Proposal:</u></p> <ul style="list-style-type: none"> <li>- have the characteristic smell and taste of the Basic/essential and/or optional ingredients and free from foreign smell and taste</li> </ul>	<p>Accepted. The text has been amended accordingly.</p>
17	US	<b>4 Food additives</b>	<p><u>Issue &amp; Rationale:</u> This section needs to reference the Codex General Standard for Food Additive (GSFA), Food Category and Table I, II or III. The</p>	<p><u>Recommendation:</u> It is recommended to replace the table of prescribed food additives and replace it with a general reference to the GSFA.</p>	<p>Accepted. Table of prescribed food additives has been replaced by a general reference to the GSFA to allow</p>

			general reference to the GSFA allows greater flexibility in the use of food additives. Also, if some food additives are decertified for use in this product or new ones are certified, the standard does not need to be revised to reflect the changes.		greater flexibility in the use of food additives.  Considering comments from US, Japan, Korea, and Thailand, this part is amended accordingly. Each item of food additive has been checked to see whether it falls into Tables 1 and 2 of the <i>General Standard for Food Additives</i> (CODEX STAN 192-1995) in food category 06.7 Pre-cooked or processed rice products, including rice cakes (Oriental type only) ; and whether it falls into Table 3 used as GMP. This part has been rearranged accordingly.
18	Thailand	8. Labelling	The detail of non-retail containers should be added as follows:	The product covered by the provisions of this Standard shall be labelled in accordance with the <i>General Standard for the Labeling of Prepackaged Foods</i> (CXS 1-1985). The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods</i> (CXS 346-2021). In addition, the following specific provisions apply:	Accepted. The detail of non-retail containers has been added.
19	Japan	8.1 Name of the food	<b>8.1 Name of the food</b>	<b>8.1 Name of the product</b>	Accepted. The title has been amended.
20	Japan	8.1 Name of the Food	If allowed by national legislation or otherwise identified to the consumer in the country where the product is sold, other names may be used.  Rationale: Japan proposes replacing the original text with the text which is used in other Codex Standards.	<b>Other names</b> may be used in accordance with the law and custom of the country in which the product is sold and in the manner not to mislead consumers.	Accepted. The text has been amended accordingly.  Examples of other names of product used in Asian countries, Zongzi, Chimaki, Ba- Jang, Khao Tom Mat, lotus leaf rice, Ketupat, Ma-chang and etc., are added as a footnote in the draft.
21	Thailand	8.1 Name of the Food	We would like to amend the sentence as follows	<u>The name of the product shall be “cooked rice wrapped in plant leaves”</u> . The product shall be labelled with the corresponding name described in	Accepted. The text has been amended accordingly.



			<b>Rationale:</b> To be consistent with other Codex standards such as Regional Standard for Fermented Soybean Paste (CXS 298R-2009), Standard for Fish Sauce (CXS 302-2011) and Standard for Ginseng Products (CXS 321-2015)	Section 2.2. If allowed by national legislation or otherwise identified to the consumer in the country where the product is sold, other names may be used.	
22	US	8.1 Name of the Food	<b>Issue &amp; Rationale:</b> This section fails to mention when the product has a filling. The filling must be indicated as part of the name, thereby providing information to the trader and consumer. Therefore, a new section is proposed.	<b>Proposal:</b> <b>8.1.2</b> The name of the product shall be <b>a)</b> For product without fillings - “Cooked rice wrapped in plant leaves” <b>b)</b> For product with fillings – Cooked Rice filled with [name of filling] as described in Section 3.1.2.	The comment has been taken into careful consideration.  As the fillings of “Cooked rice wrapped in plant leaves” vary a lot, ranging from all sorts of meat and vegetables to seafood, mushrooms and even fruit, which also vary greatly from countries to countries, and also from regions to regions within a certain country, it is difficult to name the product with “Cooked Rice filled with [name of filling]”.
23	US	8.3 Others	<b>Issue and Rationale:</b> This section should indicate the “consumer preparation methods.” e.g., Heat for 5 minutes at 50°C or microwave for 3 minutes etc.		Consumer preparation method (instruction for use) is contained in Section 4.8 of <i>General Standard for the Labeling of Prepackaged Foods (CXS 1-1985)</i> . The specific instructions for consumers is difficult to be given in this standard as the size, the proportion of the fillings, the total weight of the product and etc are different to some extent.  “Storage” and “Instruction for use” is not specified in this standard since the detail about instruction of storage and edible method are in <i>CXS 1-1985</i> .
24	The Republic of Korea	9. Methods of Analysis and Sampling	Method of analysis for determination of moisture content should be provided in this provision.  For determination of peroxide value, method for extraction of oil from food matrix and method for determination of		Moisture requirement has been deleted as recommended by Thailand and US.  Method for extraction of oil has been added in order to be consistent with other Codex standard, for example,

			peroxide value should be specified, respectively.		Standard for instant noodles (CXS 249-2006).
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