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codex alimentarius commission



FOOD AND AGRICULTURE
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HEALTH
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Agenda Item 8

ALINORM 05/28/8-Add.3

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ENGLISH ONLY
ANGALIS SEULEMENT
SÓLO EN INGLÉS

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-eighth Session
FAO Headquarters, Rome, 4 – 9 July 2005

LIST OF PROPOSALS FOR THE ELABORATION OF NEW STANDARDS AND RELATED TEXTS AND FOR THE DISCONTINUATION OF WORK

CONSIDERATION OF THE NEED FOR A CODEX STANDARD FOR SOY SAUCE

Comments of the Government of JAPAN on

THE NEED FOR A CODEX STANDARD FOR SOY SAUCE”

Japan would like to thank the secretariat for the opportunity to provide comments in relation to the need for a Codex standard for soy sauce. (CL 2005/6-EXEC)

Regarding the Secretary's questionnaire, Japan, as a co-drafter of the proposed draft standard for soy sauce with Korea, concludes that the most preferred approach is to discontinue the work on the standardization of soy sauce, although Japan would be pleased to continue to be a co-drafter in case the CAC decided to continue this work.

The details of our assessment are described in the attached table while summary is as follows:

- 1) There are no consumer protection issues.
- 2) Since diversification of soy sauce turned out to be far beyond expectation,
 - it is difficult to establish inclusive standard while protecting traditional mode of manufacture of fermented soy sauce.
 - expected outcome of standardization would be either low amenability or potential impediments to trade caused by confusion.

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Criteria	Facts	Assessment
Medium-Term Plan of Work	The elaboration of Medium-Term Plan (MTP) 2003 - 2007” was discontinued. (ALINORM 04/27/10A, Paragraph 8)	Not Applicable.
specific relevant strategic project	Strategic Framework 2003-2007	Too general to be utilized as assessment criteria
The prospect of completing the work within a reasonable period of time	<ul style="list-style-type: none"> - 6 years have already passed since the approval of the elaboration, however it is still stuck in Step 3. - Diverse views on soy sauce have been presented by CCPFV members relating to scope and description of soy sauce. (CX/PFV 04/22/8 Add.1, CRD4, 5 and 6 of the 21st Session) 	There appears to be little prospect of completion since there are diverse views on the fundamental sections of a standard for soy sauce such as scope and description.
(a) Consumer protection from the point of view of health and fraudulent practices	<ul style="list-style-type: none"> - Some members raised concern about chloropropanols as a consumer protection issue. (CX/PFV 04/22/8 Add.1, CRD4, 5 and 6 of the 21st Session) - CAC endorsed the new work for CCFAC to establish a maximum level for 3-MCPD in acid-HVPs and acid-HVP containing products.(ALINORM 04/27/41, App. VI) 	No consumers’ health issues.
	Many countries supported the elaboration of the standard for fermented soy sauce was a traditional food commodity in the country, to protect the traditional mode of manufacture of fermented soy sauce. (ALINORM 99/27, paragraph 73)	No trade problem caused by the difference between “fermented” and “non-fermented”.
(b) Volume of production and consumption in individual countries and volume and pattern of trade between countries	<p>The Japan Soy Sauce Association estimates annual production of fermented soy sauce and mixed soy sauce at about 9.5 million kiloliter, most of which is produced by three countries, i.e. China, Japan and Korea.</p> <p>FAO’s 2004 statistics show that many countries including non-fermented soy sauce producing countries participate in trading.</p>	It is hard to grasp the overall picture of distribution of soy sauce if the definition expanded to include non-fermented soy sauce, sweet soy sauce or others.
(c) Diversification of national legislations and apparent resultant or potential impediments to international trade	It is observed that some countries, where soy sauce is traditionally consumed, have strict regulations regarding distinction between fermented and non-fermented soy sauce, while other countries, where soy sauce recently becomes popular, have less stringent ones.	All through the process of adopting the elaboration of soy sauce and work at CCPFV, there is no issue raised by members indicating “apparent resultant or potential impediments to international trade” caused by diversification of national legislations.

Criteria	Facts	Assessment
<i>(e) Amenability of the commodity to standardization</i>	In response to the decision of the development of inclusive standard (ALINORM 99/4, paragraph 39), the proposed draft standard of Soy Sauce was submitted to CCPFV in 2002, which included Hydrolyzed Vegetable Protein (HVP). (CX/PFV 02/9). There are some requests to include additional products such as “sweet soy sauce” or those with additional ingredients such as spices and herbs, onions or garlic, while opposition to include HVP exists.(CX/PFV 04/22/8 Add.1, CRD4, 5 and6 of the 21 st Session)	Diverse views on soy sauce have been presented at CCPFV. Taking into account the diverse views on soy sauce, expected outcome of standardization would be either low amenability or potential impediments to trade caused by confusion.
<i>(f) Coverage of the main consumer protection and trade issues by existing or proposed general standards</i>	As of now, only recognized consumer protection or trade issue is that of chloropropanols, which has already been covered by CCFAC’s current task as mentioned in (a).	There is nothing left for Soy Sauce Standard to contribute to the consumer protection and trade issues.

Note:

Soy sauce standard should not be developed even as a regional standard for the following reasons:

- As far as Japan recognizes, currently, there is only one regional standard exists. (Codex Standard for Fresh Fungus “Chanterelle”, CODEX STAN 40-1981)
- Regional standards are not included in the definition of “international standards” used in the SPS agreement. (ALINORM99/33, paragraph 50)
- Executive Committee is currently asking members of appropriateness to remove the provision for the drafting of regional standards from the TOR of the Regional Coordinating Committees. (CL2005/12-CAC)
- Asia, the main soy sauce producing and consuming region, has diverse views on soy sauce.