

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES

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

Comments on the
PROPOSED DRAFT ANNEXES ON QUICK FROZEN VEGETABLES
Comments Submitted by:

Canada, Ecuador, Ghana, Kenya

CANADA

General Comments

Canada appreciates the work done by the electronic working group on the draft annexes which advances the work of the CCPFV.

In relation to food additives, Canada supports having the GSFA as the single authoritative reference point for food additives and this should be made clear in all commodity standards.

Specific Comments

Canada has specific comments related to Annex IV, French fried potatoes.

Canada supports the deletion of “bake/baking” from the product definition.

To simplify the standard, Canada supports limiting the shapes to straight and crinkle cut and including other shapes under “other styles”. Other styles can cover any other cut as long as clearly marked on the product label.

Colouring agents should be allowed to be used in the preparation of French Fried Potatoes in keeping with national legislation of the importing country. Colours are an effective tool to lower the risk of dark French fries which may be produced by overcooking.

ECUADOR

Ecuador thanks the Secretariat of the Codex Alimentarius Commission for the opportunity to submit comments on the annexes to the Standard for Quick Frozen Vegetables.

Justification:

In recent years, 86% of all vegetable exports from Ecuador were broccoli, onions, and garlic. The annual growth rate in overall fruit and vegetable exports (fresh and processed) is quite high: 11% and 21%, respectively. The production of refrigerated or frozen vegetables account for 57% of the processed vegetables.

It has been noted that Ecuador has the aptitude and attitude to develop and become competitive in fruits and vegetables, which will improve with standards to help maintain their quality and uniformity.

1.1. Comments: Annex I.- Broccoli

1.1.1. We suggest expressing the values in units from the international system.

1.1.2. We welcome the content of 1.2.1, paragraph e).

1.1.3. We suggest that the sizing values for classification in Table 1 be expressed as ranges.

1.1.4. We suggest that 2.1.2 Other Permitted Ingredients exactly specify that the Codex Standard refers to each type of permitted ingredient.

- 1.1.5. We suggest that 2.2.3 and 2.2.4 express the sample in units, not in grams.
- 1.1.6. We welcome Tables 3 and 4, as presented by Codex for this annex, given that they are more flexible in their values for defects.

1.2. Comment: Annex II.- Brussel Sprouts

- 1.2.1. We suggest expressing the values in units from the international system.
- 1.2.2. We suggest that the sizing values for classification in Table 1 be expressed as ranges.
- 1.2.3. We suggest that 2.1.2 Other Permitted Ingredients exactly specify that the Codex Standard refers to each type of permitted ingredient.
- 1.2.4. We welcome Table 3, as presented by Codex for this annex, given that it is more specific about tolerance of defects.
- 1.2.5. We suggest that 4. Processing Aids establish the maximum value to be used or that it refer to Codex Standard 192-2015.

1.3. Comments: Annex III.- Cauliflower.

- 1.3.1. We welcome the content of 1.2.1 paragraph d).
- 1.3.2. We suggest that 2.1.2 Other Permitted Ingredients exactly specify that the Codex Standard refers to each type of permitted ingredient.
- 1.3.3. We welcome the table proposed by France, as its values for tolerating defects are more manageable for industry.

1.4. Comments: Annex IV.- French fried potatoes.

- 1.4.1. We welcome the content of 1.2.1.1 paragraph e).
- 1.4.2. We suggest that point 3.2 on additives that can be applied to the product clarify the point on food enzymes, as they are not classified as additives, according to Codex Standard 192-2015.

1.5. Comments: Annex V.- Green beans and wax beans.

- 1.5.1. We welcome the table on visual defects proposed by France for this annex, given that it defines specific and exact values in %m/m and kg.

1.6. Comments: Annex VI.- Peas

1.6.1. We suggest that the values established for Table 1. Specifications for Sizing be expressed as ranges to the size classification clearer.

1.7. Comments: Annex VII.- Spinach

1.7.1. We welcome the content of 1.2.1 paragraph f) on other styles of presentation of spinach.

1.7.2. We welcome France's proposal for Tables 1 and 2, as they are more tolerant with the limits or numbers permitted for defects per spinach leaf.

1.7.3. We suggest that 4. Processing Aids provide the maximum use limits or refer to the additive standard from Codex Standard 192-2015.

1.8. Comments: Appendix III.- Quick Frozen Vegetables– Foods Additives.

1.8.1. We suggest that the point on additives be clarified in each annex, because each one states that not food additives are not permitted, and yet the draft provides a list of permitted additives.

1.8.2. We suggest that this appendix break down each annex by vegetable or that each annex make reference to the appendix.

GHANA**Annex 1: Broccoli****Section 1.2.1 Styles (e)**

Ghana supports the proposed text in bullet point "e" i.e. "Other styles as defined in Section 2.4 Styles of the general provisions".

Rationale: The definition for other styles already exists in the general standard. Since the Proposed Draft Annexes are to be used in conjunction with the main standard, the annexes should only contain information that are peculiar to the respective products. Where generic definitions have already been developed, annexes should make reference to such definitions to avoid repetition.

Section 2.2.4 Allowances of Defects

Ghana supports the proposed text from France for cut and chopped styles

Rationale: The proposal from France is more specific and inclusive.

Annex 2: Brussels Sprouts**Section 2.2.4.3 Allowances of Defects**

Ghana agrees with the proposed table from France

Rationale: The proposed table from France gives more clarity while the existing table is too subjective.

Annex 3: Cauliflower**Section 1.2.1 Other Styles**

Editorial comment: ...ensure stability of colour and ~~14~~flavour flavor...

Specific comment: Ghana supports the proposed text in bullet point "e" i. e. "Other styles as defined in Section 2.4 Styles of the general provisions"

Rationale: The definition for other styles already exists in the general standard; it is unnecessary to repeat the definition in the Annex, reference should rather be made to the definition in the general standard

Section 2.2.4 Allowances for Defects

Ghana supports the proposed table from France

Rationale: The table from France provides more clarity and is simpler to work with the percentages provided instead of the subjective scoring method in the previous table.

Appendix IV Quick Frozen French Fried Potatoes

Section 1.2.1.1 Other Styles

Ghana supports the proposed text in bullet point “e” i.e. “Other styles as defined in Section 2.4 Styles of the general provisions”.

Rationale: The definition for other styles already exists in the general standard; it is unnecessary to repeat the definition in the Annex, reference should rather be made to the definition in the general standard

Appendix V Green Beans and Wax Beans

Section 1.2.2 Other Styles

Ghana supports the proposed text in bullet point “e” i.e. “Other styles as defined in Section 2.4 Styles of the general provisions”

Rationale: The definition for other styles already exists in the general standard; it is unnecessary to repeat the definition in the Annex, reference should rather be made to the definition in the general standard

Section 2.2.4.2 VISUAL DEFECTS

Ghana supports the proposed table by France

Rationale: The table provides more clarity and ease of application.

Appendix VI PEAS

Section 1.1 Product Definition and Section 1.2.1.3

Editorial comments:

...sufficiently blanched to ensure adequate stability of colour and ~~30~~**30** flavor during normal marketing cycles.

...if size graded, the product shall **“have”** a minimum of 80% either by number or weight of peas of the declared

Specific comment: Ghana supports the table proposed by France for tolerance and size.

Rationale: Because it provides more clarity and ease of application

Section 2.1.2 OTHER PERMITTED INGREDIENTS

Ghana supports the proposed inclusions of ingredients for sauces (i.e. flavorings, ingredients and seasonings) in bullet “a”

Rationale: The inclusion provides more clarity on the composition of the sauces

Section 2.2.4 TOLERANCES FOR VISUAL DEFECTS

Ghana supports the table on Tolerance for Visual Defects

Rationale: The inclusion provides more clarity to the sauces and in the table makes it easier and simpler to work with the percentages

Appendix VII SPINACH

Section 1.1 PRODUCT DEFINITION

Editorial comment: ...sufficiently blanched to ensure adequate stability of colour and ~~33~~**33** flavor during normal marketing cycles and properly drained.

Section 1.2.1 OTHER STYLES

Ghana supports the text on “other styles”

Rationale: The definition for other styles already exists in the general standard; it is unnecessary to repeat the definition in the Annex, reference should rather be made to the definition in the general standard

Section 2.1.2 OTHER PERMITTED INGREDIENTS

Ghana supports the proposed inclusions of ingredients for sauces (i.e. flavorings, ingredients and seasonings)

Rationale: The inclusion provides more clarity on the composition of the sauces

Section 2.2.7 DEFECTS AND ALLOWANCES

Ghana supports the **Table 1** as proposed by France for defect allowances of whole leaf and cut leaf style.

Rationale: The table for whole and cut leaf is simpler and easy to work with.

KENYA

ANNEXI: BROCCOLI APPENDIX 1

1.2 PRESENTATION

1.2.1 Styles

(e) ~~{Other Styles- as defined in Section 2.4 Styles of the general provisions}~~

COMMENT

We propose to open the brackets of "other Styles"(e) above, for we accept what is stipulated in clause 2.4 of STAN 110 1981; it is adequate for it covers what has not been covered by other styles as stated below.

Any other presentation of the product shall be permitted provided that it:

- (a) is sufficiently distinctive from other forms of presentation laid down in this standard;
- (b) meets all other requirements of this standard;
- (c) is adequately described on the label to avoid confusing or misleading the consumer.

2.2.4 Defects and Allowances

[PROPOSAL BY FRANCE

Visual Defects by Mass (%) Table - Cut and Chopped Styles

VISUAL DEFECTS	PERCENTAGE BY MASS		
	Spears, florets	Cut florets	Chopped
(a) EVM - Extraneous Vegetable Material	1	2	2
(b) Detached leaves and stems	10	-	-
(c) Fragments (for florets)	20	-	-
(d) Blemished	10	10	10
(e) Mechanical damage	10	-	-
(f) Poorly trimmed			
(g) Over mature or poorly developed	5	10	10
(h) Fibrous	5	5	5
(i) Woody			
TOTAL ALLOWANCES: 15% FOR SPEARS AND FLORETS, 20% FOR THE OTHERS STYLES]			

COMMENT ON THE TABLE ABOVE

We accept visual defects mentioned in the table proposed by France except for (g) (h) and (i) of which the current standard states that they should be practically free and therefore we also propose the defects %tage by mass to be reduced substantially for overmature or poorly developed and fibrious categories. For 'woody' it should be zero tolerance.

We can also make reference to the definitions of the three below for clarification which are self explanatory while considering the zero limits

The definitions of the three are as follow:

Overmature or Poorly developed, means individual buds are in the flowered stage and with respect to spears and florets branching bud clusters which comprise the head are spread so as to seriously affect the appearance of the unit, or the bud clusters are of such advanced maturity that individual buds and supporting stems form loosely structured clusters.

Fibrous, means tough fibre that is normally developed near the outside portion of the broccoli stem; such units are tough but still edible.

Woody means tough fibre that is normally developed near the outside portion of the broccoli stem, such units are extremely tough and highly objectionable.

d) Blemishes: We propose the committee to review the tolerance downwards since the blemishes are not edible. We propose the 10% mentioned in the table should be for the minor blemishes.

ANNEX 11: BRUSSELS SPROUTS**[PROPOSAL BY FRANCE]**

Defect	Tolerances m/m%
(a) Yellow Sprouts	7
(b) Loosely structured	5
(c) Perforated leaves	8
(d) Brown /altered	2
(e) Seriously blemished	5
(f) Blemished	
(g) Poorly trimmed or mechanically damaged	12
(h) Loose leaf	2
(i) EVM	1 by number
Aggregate defects	20 or if one defect is over 1.5 the allowance]

COMMENT

We accept the proposal by France mentioned in the above table as it is simpler to understand and apply.

We would also like to recommend that the 'seriously blemishes' should be separated with much lower tolerance than the blemish.

ANNEXIII: CAULIFLOWER**1.2 PRESENTATION****1.2.1 Style**

(d) **[Other Styles- as defined in Section 2.4 Styles of the general provisions]**

COMMENT

We propose to open the square brackets of "other styles (e)" above for we accept what is stipulated in clause 2.4 of STAN 111: 1981, which is adequate and complies with the presentation mentioned in (a-c) below .

'Any other presentation of the product shall be permitted provided that it:

(a) is sufficiently distinctive from other forms of presentation laid down in this standard;

(b) meets all other requirements of this standard;

(c) is adequately described on the label to avoid confusing or misleading the consumer.'

[PROPOSAL BY FRANCE]

DEFECTS	FLORETS AND SPLIT FLORETS		CUT FLORETS
	PERCENTAGE BY NUMBER	PERCENTAGE BY WEIGHT	PERCENTAGE BY WEIGHT
(a) Discolouration			
(i) Light	8		15
(ii) Dark	7		
(b) Blemished			
(i) Minor	4		6
(ii) Major	2		
(c) (e) Mechanically damaged and poorly trimmed		4	4
(d) Fibrous	-	-	-
(g) Fragments		10	
(h) Not compact	5		
(f) (l) Loose stem and leaves		3	1

COMMENT

We prefer to retain the original table but not the proposal of France's table as there is no justification for France's table for every percentage by number nor by weight.

ANNEX IV: QUICK FROZEN FRENCH FRIED POTATOES STAN 114:1981**1.2 PRESENTATION****1.2.1 Styles****1.2.1.1 Nature of the Surface**

(e) **{Other Styles- as defined in Section 2.4 Styles of the General Provisions}**

Comment:

We propose to open the brackets of (e) for we accept what is stipulated in clause 2.4 of STAN 114: 1981, it is adequate. We accept the two additions

Any other presentation of the product shall be permitted provided that it:

- (a) is sufficiently distinctive from other forms of presentation laid down in this standard;
- (b) meets all other requirements of this standard;
- (c) is adequately described on the label to avoid confusing or misleading the consumer.

3. FOOD ADDITIVES

3.2 In addition, the following food additives apply to the products covered by the Standard:

INS No	Food Additive	Maximum Level
<u>338: 339 (i)-(iii); 340 (i) – (111)-</u> <u>341(i)- (iii); 342(i),(ii); 343(i)-</u> <u>(iii); 450(i)-(iii),(v)-(vii);</u> <u>451(i), (ii); 452(i)-(v);</u> <u>330</u> <u>296</u> <u>300</u>	<u>Phosphates</u> <u>Citric acid</u> <u>Malic acid DL**; Ascorbic acid L***</u> <u>[Food Enzymes – asparaginase</u> <u>Sodium acid</u> <u>Pyrophosphate-</u> <u>Sequestering agents</u> <u>Coloring agents</u> <u>(for discussion points)</u> <u>Emulsifying agents</u> <u>Gelling agents</u> <u>Stabilizing agents</u> <u>Thickening agents</u> <u>Sweeteners]</u>	100 mg/k singly or in combination (phosphates expressed*as P ₂ O ₅) <u>GMP</u> <u>GMP</u> <u>GMP</u>

COMMENT

We would like to retain the original list of the additives in the Codex standard 114:1981. However, in clause 3.2 table mentioned above we cannot accept the two additions unless the two additives can be justified with safe levels and technological functionality.

ANNEX V: GREENBEANS ANDWAX BEANS--STAN 113:1981**1.2.2 Styles**

Quick frozen green beans and quick frozen wax beans shall be presented in the following styles:

(f) **[Other Styles- as defined in Section 2.4 Styles of the General Provisions]**

COMMENT

We propose to open the square brackets of ' Other Styles' (e) for we accept what is stipulated in clause 2.4 of STAN 113: 1981, It is adequate as the statements below are self explanatory.

Any other presentation of the product shall be permitted provided that it:

- (a) is sufficiently distinctive from other forms of presentation laid down in this standard;
- (b) meets all other requirements of this standard;
- (c) is adequately described on the label to avoid confusing or misleading the consumer

2.2.4.2 VisualDefects

For tolerance based on the standard sample size indicated in Section 2.2.3, visual defects shall be assigned points in accordance with the Table in this Section. The maximum number of defects permitted is the Total Allowable Points rating indicated for the respective categories 1, 2 and 3 or the Combined Total of the foregoing categories.

[PROPOSAL by France]

DEFECTS	TOLERANCES (%m/m)	TOLERANCES (BY NUMBER)
(a) EVM		3/ kg
(b) Stem end		6/ kg
(c) Major blemish	8	
(d) Minor blemish	12	
(e) Mechanical damage (Whole and cut styles)	5	
(f) Undeveloped (Whole style)	2	
(g) Tough strings and (h)Fibrous unit	1	
(h) Small pieces (Whole, Cut and Sliced Styles)	20	

TOTAL TOLERANCES: b t o h: 20%; and if one of the defects is over 1.5 the tolerance of the table]

COMMENT ON THE TABLE MENTIONED ABOVE

We prefer to retain the original table as there is no technological justification for the proposed "tolerance %m/m" of France's table mentioned above.

ANNEX VI: PEAS**1.2.1.3 Tolerances for Sizes**

If size graded, the product shall a minimum of 80% either by number or weight of peas of the declared size, or of smaller sizes. It shall contain no more than 20% either by number or weight of peas of the next two larger adjoining sizes when applicable.

[PROPOSAL BY FRANCE

Size Designation	Round Hole Sieve Size in mm	
	Will Not Pass Through	Will Pass Through
Smooth Green Peas		
1) Extra small		7.5
2) Very small	7.5	8.2
3) Small	8.2	8.75
4) Medium	8.75	9.3
5) Large	9.3	
Wrinkled Sweet Green Peas		
1) Extra small		7.5
2) Very small	7.5	8.2
3) Small	8.2	9.3
4) Medium	9.3	10.2
5) Large	10.2	1

COMMENT

We accept the proposal by France as it is simpler to understand and apply.

ANNEXVII: SPINACH STAN 77:1981**1.2 PRESENTATION****1.2.1 Styles**

(f) ~~[Other Styles- as defined in Section 2.4 Styles of the general provisions]~~

COMMENT

We propose to open the square brackets of Other Styles (e) for we accept what is stipulated in clause 2.4 of STAN 77: 1981, which is adequate for it is self explanatory as indicated below.

Any other presentation of the product shall be permitted provided that it:

- (a) is sufficiently distinctive from other forms of presentation laid down in this standard;
- (b) meets all other requirements of this standard;
- (c) is adequately described on the label to avoid confusing or misleading the consumer

2.2.7 Defects and Allowances

For tolerances based on the standard sample sizes indicated in Section 2.2.4, visual defects shall be assigned points in accordance with the appropriate Table in this Section. The maximum number of defects permitted is the Total Allowable Points rating indicated for the respective categories Minor, Major and Serious or the Combined Total of the foregoing categories.

OPTION 2: Table 1 - Whole Leaf and Cut Leaf Style (France)

Defect	Tolerance (By number)	Tolerance (% m/m)
a) Discolouration		
Minor	5	
Major	20	
b) EVM	2	
Flower buds	5	
Crown material	3	
Root material	1	
Mineral matter		0,1
Total allowable points	25	

OPTION 2: Table 1 - Whole Leaf and Cut Leaf Style (France)

COMMENT ON THE TABLE MENTIONED ABOVE

We prefer to retain the original table as there is no justification for France's table mentioned above.

Option 2; (France) Table 2 – Chopped and pureed Style Standard sample size: 100g

Defect	Allowance
Any dark particle or flower bud	Shall not affect the overall appearance of the product
Mineral matter	0,1%

COMMENT

We accept the addition of Mineral matter to the original table and we would propose renaming the word "mineral matter" with 'water insoluble in organic residues'. There is water soluble mineral matter that may not be captured by method of analysis.