COMMENTS OF CHINA

The CAC website provide the proposed draft regional standard for laver products (at Step 3) in Chinese version have a serious mistake, that all of “cadmium (镉)” translate to “钙” in the text, please be amended “钙” to “镉”.

China provides the following comments on the proposed draft regional standard for laver products

2.2 Product Types

2.2.1 Dried Laver

Original text:
(a) Dried laver is the product raw laver which is washed, chopped/cut, molded, dehydrated and dried (1st dried products). It may go through a re-drying process (2nd dried products) for long-term storage. The product which is dried directly after harvesting without undergoing any other processes is also included in this type.

Proposed text:
(a) Dried laver product is the raw laver after harvesting which is washed, chopped/cut, molded, dehydrated and dried; Or the product which is washed, dried after harvesting without undergoing any other processes (1st dried products). It may go through a re-drying process (2nd dried products) for long-term storage.

Original text:
(b) Product may come in various forms such as a round lump, a shredded fragment, a sheet, a rolled-sheet, etc.

Proposed text:
(b) Product may come in various forms such as a round lump, a sheet, etc.

Rational: The round lump and sheet forms are the mainstream products in the market.

2.2.3.2 Brewing Seasoned Laver

Brewing seasoned laver is the product in which the dried laver, defined in Section 2.2.1, is broken, roasted/stir-fried, and then packed. The product can be seasoned and needs to add hot boiling water to brew before consumption.

Proposal: Replace "hot" with "boiling".

Rational: This product needs to add boiling water (above 80℃) before consumption.

3.1.2 Optional Ingredients

a) Green laver (Ulva spp.); not exceeding 30% of the total weight of the product.

Proposal:

i. Replace “Green laver (Ulva spp.)” to “Green seaweed of Ulva spp.”

Rational: “Green laver” is not an international general expression, so it is should not be used in this standard.
ii. We are disagree the other edible seaweeds contain up to 30%.

**Rational:** Add too many other edible algae, will affect the flavor of laver.

h) Nuts and seeds, anchovy, shrimp; not exceeding 10% of the total weight of the product.

**Amendment:** The content of the nuts and seeds, anchovy, shrimp should be on the label.

3.2.2.3  b) Acid value

c) Peroxide value

**Comments:** According to the test data, although the acid value less than 3.0mg KOH/g and the peroxide value less than 60.0meq/kg, but the laver products already emerged the fat rancidity taste. Please provide the establishment bases of the limited value for acid value and peroxide value.

d) **Add** “3.2.2.3(d) fat content :no more than 10%.”

**Rational:** Laver is health food with high-protein and low-fat. If add too much oil, it will not only affect the original flavor and shelf life, but also affect the consuming confidence of health food. At present, some laver products fat content already up to 30 ~ 50%, that should be controlled.

e) **Add** the provisions “sodium chloride and sugars content level”

**Rational:** From the perspective of nutrition and health, the low salt, low sugar and low fat are the request of the health food. So we suggestion control the content of sodium chloride and sugar in the laver product.