Japan

We are pleased to submit the following comments on food additive provision in the proposed draft regional standard for Tempe.

Added texts are underlined.

4. FOOD ADDITIVES

4.1 Tempe should not contain food additives.

4.2 Processing Aids

<table>
<thead>
<tr>
<th>INS No.</th>
<th>Name of Processing Aid</th>
</tr>
</thead>
<tbody>
<tr>
<td>260</td>
<td>Acetic acid, glacial</td>
</tr>
<tr>
<td>270</td>
<td>Lactic acid L-, D- and DL-</td>
</tr>
<tr>
<td>330</td>
<td>Citric acid</td>
</tr>
</tbody>
</table>

(Rationale)

We propose to add these three processing aids in this section because producers of Tempe in Japan have to use them during soaking soybean in water to lower pH and for facilitating fermentation by promoting the growth of mould of *Rhizopus spp.* and for preventing the growth of other microorganisms. However, those processing aids added to Tempe are finally neutralized through the process of fermentation.

According to the Food Additive section of “Format for Codex Commodity Standards” in the Procedural Manual (20th edition, P50), it stipulates that “in this section, provisions for flavourings and processing aids should also be included”. Therefore, these three processing aids should be included in this section.

Philippines

The Philippines would like to extend its appreciation to the eWG headed by Indonesia for the work on the Proposed Draft Standard for Tempe and for considering the previously submitted Philippine Position.

The following is the Philippine Position on the latest Proposed Draft Standard for Tempe, those in **bold and underlined fonts** are the corrections being proposed:

1. In Section 1, Scope:
   
   We propose the following:
   
   “This standard applies to tempe as defined in Section 2 below and intended for human consumption. It does not apply to those that undergo further processing other than freezing and non-fermented tempe.”

2. In Section 4, Food Additives:
The Philippines would like to seek clarification on the following if and when there are future food additive that will better improve tempe such as its nutritional value and shelf stability. Stating that food additives are not allowed, limits the innovation of the food processor.

We would like to propose the following:

“Food additives can be added in accordance with GMP and latest Codex GSFA on Category 06.8.6, Fermented Soybean.”

3. Section 7, Labelling:

The Philippines would like to suggest the inclusion of such international name as “Tempeh.”

4. For inclusion of Section 8.0, Weights and Measures as the integral part of all Codex Standards as stipulated in the Codex Procedural Manual.