

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 7a

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR ASIA

Nineteenth Session

Tokyo, Japan, 3 – 7 November

PROPOSED DRAFT REGIONAL STANDARD FOR LAYER PRODUCTS

(N14-2011)

(Comments from Japan)

Comments are generally presented below in **bold font** (addition) and ~~strike-through font~~ (deletion).

Specific Comments

2.1 Product Definition

Proposed text:

(b) Laver products shall be packaged in a manner to protect and maintain hygienic, nutritional and quality attributes of the products to the extent reasonably practical. In addition, the products shall be packaged to protect them from moisture. **Packaging materials used for retail products shall be completely transparent except for printing areas or completely opaque.**

Rationale:

Color is one of the important characteristics of laver products to judge their quality. Colored or semi-transparent packaging materials may confuse the consumers to figure out the exact color of laver products.

Proposed new paragraph:

(c) Containers used for transporting laver products shall have adequate strength to protect laver products from external impact.

Rationale:

Since Laver products are extremely vulnerable to external impact, containers used for transporting laver products, such as cardboard boxes, shall have adequate strength to protect products from damage.

2.2.1 Dried Laver

Proposed text:

~~2.2.1 Dried Laver~~ **2.2.1.1 Dried Laver**

(a) Dried laver is the product of 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.~~ (b) Product may come in various forms such as a round lump, a shredded fragment, a sheet, a rolled-sheet, etc.

Rationale:

We would like to propose to delete the relevant sentence and to establish a new subsection “2.2.1.2 Other Dried Laver” because the product which is dried directly after harvesting without undergoing any other processes has a unique manufacturing process and it should be separated. In addition, (b) could be integrated into (a).

Proposed text:

~~(eb) In the case of sheet form, Retail product may contain holes, torn or rolled parts and/or shall be free from any edible foreign matters. While non-retail product may contain edible foreign matters, they shall be identified and appropriately labeled.~~

Rationale for deletion:

Regarding the provisions for holes, torn and rolled parts, their acceptable levels (e.g. total areas of holes should be less than X% of total) should be specifically defined since such appearances can be regarded as defectives. However, it can be challenging to establish applicable specifications to all species of the genus *Pyropia* as they have different varieties of biological characteristics such as hardness of cells. Furthermore, it is known that some laver products are composed of different species. Therefore, we would like to propose the provision on for holes, torn and rolled parts should be simply deleted.

Rationale for addition:

Edible foreign matters may be mistaken as foreign matters by consumers because consumers may not be able to distinguish edible foreign matters from foreign matters. Since foreign matters could pose a threat to human health or is not suitable for human consumption, any foreign matters should not be contained in retail products to avoid such confusion. For non-retail products, however, edible foreign matters are acceptable as long as they are identified and the appropriate information should be clearly conveyed to importers

Proposed new category:

2.2.1.2 Other Dried Laver

(a) Other dried laver is the product other than the product defined in Section 2.2.1.1. The product which is dried directly after harvesting without undergoing any other processes is included in this type. Product may come in various forms such as a shredded fragment, a sheet, etc.

(b) Retail product shall be free from any edible foreign matters. While non-retail product may contain edible foreign matters, they shall be identified and appropriately labeled.

Rationale for addition:

Please refer to our comments above for **2.2.1 Dried Laver**.

2.2.3 Seasoned Laver Products

Proposed text:

2.2.3.1 Seasoned Laver

Seasoned laver is the product in which the dried laver, defined in Section 2.2.1, is seasoned whether or not it is roasted, ~~fried, treated with edible oil.~~

Proposed new category:

2.2.3.3 Fried Laver, Laver treated with edible oil

Fried laver or laver treated with edible oil is the product in which the dried laver, defined in Section 2.2.1, is fried or treated with edible oil, respectively.

Rationale:

Frying or treating with edible oil is a unique manufacturing process for laver which is similar to drying or roasting. The provisions of 3.2.3.2 b) and c) also indicate that they are applicable only for the products fried or treated with edible oil. Therefore, we would like to propose a new category.

Proposed text:

2.2.3.34 Other Seasoned Laver

Other seasoned laver is the product whether or not it is roasted, ~~fried, treated with edible oil~~ other than the products defined in Sections 2.2.3.1, ~~and 2.2.3.2~~ **or 2.2.3.3.**

Rationale:

Editorial amendment due to changes in 2.2.3

3.1.2 Optional Ingredients

Proposed text:

~~The ingredient stated in (a) below Green laver (*Ulva spp.*) may be applied to the products defined in Sections 2.2.1.1 and 2.2.1.2., and the following ingredients in (b) through (g) may be used fFor the product defined in Section 2.2.3, (h) may be used for the product defined in Section 2.2.3.3.~~ **any optional**

ingredients may be used as long as the weight of basic ingredient, which is defined in 3.1.1, is the largest.

- a) Green laver (*Ulva* spp.); not exceeding 30% of the total weight of the product
- b) Edible oil
- e) Salt (sodium chloride)
- d) Soybean sauce
- e) Sugars in accordance with the Standard for Sugars (CAC/STAN 212-1999)
- f) Spices and culinary herbs (dehydrated, dried, crushed, cracked, ground)
- g) Other natural flavouring substances in accordance with the Guideline for the Use of Flavourings (CAC/GL 66-2008)
- h) Nuts and seeds, anchovy, shrimp; not exceeding 10% of the total weight of the product

Rationale:

For the production of seasoned lavers, a variety of ingredients are used in our country such as Japanese cooking sake, seafood, seaweed, dried vegetable, etc. other than the ingredients listed section 3.1.2. Furthermore, ingredients which are currently used can be changed frequently depending on consumers' preferences and it is unlikely to list up each ingredient in this standard. Therefore, as long as the weight of basic ingredient is the largest, the use of any optional ingredients should be allowed for seasoned laver products.

3.2.3 Seasoned Laver Products

Proposed text:

b) Acid value:

No more than 3.0 mg KOH/g (only for the products ~~fried or treated with edible oil~~ **defined in 2.2.3.3**)

c) Peroxide value:

No more than 60.0 meq/kg (only for the products ~~fried or treated with edible oil~~ **defined in 2.2.3.3**)

Rationale:

To be consistent with the proposal on the Section of 2.2.3 Seasoned Laver Products above

3.2.3 Seasoned Laver Products

Comments:

We would like to seek a clarification of scientific evidences supporting the use of limits of 3.0 mg KOH/g for Acid value and 60.0 meq/kg for Peroxide value.

4.1 Dried Laver and Roasted Laver

Proposed new text:

Neither additives nor processing aids **such as antifoaming agents** are permitted.

Rationale:

The outcome of the EWG on antifoaming agents should be clearly stated.

4.2 Seasoned Laver Products

Proposed text:

4.2.1 Food Additives

~~Food Additives except colors used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives in food category 04.2.2.2 and 04.2.2.8 or listed in Table 3 of the General Standard for Food Additives are acceptable for use in this product.~~

4.2.1.1 Acidity regulator

INS	Additive Name	Maximum level
260	Acetic acid, glacial	GMP
270	Lactic acid, L-, D- and DL-	GMP

296	Malic acid, DL-	GMP
330	Citric acid	GMP
331(iii)	Trisodium citrate	GMP
334	Tartaric acid, L(+)-	500mg/kg
336(i)	Monopotassium tartrate	60 mg/kg
340(ii)	Dipotassium hydrogen phosphate	1 mg/kg as phosphorus
341(ii)	Calcium hydrogen phosphate	20 mg/kg as phosphorus

4.2.1.2 Anticaking agent

INS	Additive Name	Maximum level
170(i)	Calcium carbonate	GMP
460(ii)	Powdered cellulose	GMP

4.2.1.3 Flavour enhancer

INS	Additive Name	Maximum level
621	Monosodium L-glutamate	GMP
627	Disodium 5'-guanylate	GMP
631	Disodium 5'-inosinate	GMP
635	Disodium 5'-ribonucleotides	GMP

4.2.1.4 Sweetener

INS	Additive Name	Maximum level
955	Sucralose (Trichlorogalactosucrose)	580 mg/kg
951	Aspartame	2400 mg/kg
420 (i)	Sorbitol	50 mg/kg
960	Steviol glycosides	900 mg/kg
950	Acesulfame potassium	350 mg/kg

4.2.1.5 Thickener

INS	Additive Name	Maximum level
406	Agar	GMP
407	Carrageenan	GMP
410	Carob bean gum	GMP
412	Guar gum	GMP
417	Tara gum	GMP
414	Gum arabic (Acacia gum)	GMP
415	Xanthan gum	GMP
459	Cyclodextrin, beta-	GMP
1204	Pullulan	GMP
1404	Oxidized starch	GMP

4.2.1.6 Flavourings

The flavourings used should comply with the *Guidelines for the Use of Flavourings (CAC/GL 66-2008)*.

Rationale:

We would like to submit a list of food additives used in Japan as above and have a further discussion at the plenary as mentioned in the Report of EWG (CX/ASIA 14/19/7). Flavourings are also used for seasoned laver products, and its provision was added in accordance with the Codex Procedural Manual Section II: Elaboration of Codex texts: Format for Codex commodity standards.

5. CONTAMINANTS

Comments:

Since lavers grow in the sea water, the contaminant level of laver products is directly reflected by the one of the sea water.

As the EWG identified data gap of occurrence data or consumption data, in order to conclude whether or not a general reference to the GSCTFF is sufficient, Japan is of the view that more data should be collected especially from other producing countries and deliberately discussed.

6. HYGIENE

Proposed text:

Seaweeds used for laver products shall be grown and processed in areas and water appropriate for cultivation and processing of seaweeds for direct human consumption. **After harvesting, raw seaweeds shall be treated with potable water or clean seawater.** In the final **step of processing** of raw material, **just before a drying process**, the seaweeds shall be treated with potable water ~~or clean seawater~~.

Rationale:

In order to prevent pathogen contamination which causes food poisoning, raw seaweeds should be treated with potable water or clean seawater after harvesting, while in the final step just before a drying process, only potable water should be allowed.

6. HYGIENE

Proposed text:

Fecal coliforms shall not be detected. The products should **also** comply with ~~any other~~ microbiological criteria established in accordance with the *Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CAC/GL 21-1997).

Rationale:

Hygienic conditions of growing areas or processing, operations, as prescribed in the first paragraph of 6. HYGIENE should be appropriately secured. Fecal coliforms could pose a serious health risk to humans and should not be detected.

7. WEIGHT AND MEASURES

Proposed text:

The weight of the product shall be expressed in the unit of "g" or "kg", **and/or in the unit of the number of sheets**. ~~In the case of sheet form, the unit of product may be expressed with the number of sheets together.~~

Rationale:

The number of sheets is widely used as a unit for laver products in our country. The national statics of laver production is also compiled in the unit of the number of sheets. In addition, an import tariff in Japan is imposed based on the number of sheets for laver products in sheet forms.

8.1 The Name of the Product

Proposed text:

~~(a)~~ The name of the products shall be in line with Section 2.2. Other appropriate names may be used if they are allowed by national legislation in the country where the products are distributed.

~~(b) When a product contains holes, torn or rolled parts and/or edible foreign matter as described in Section 2.2.1(c), the grade of products may be labeled according to the legislation of the country where the product is distributed.~~

Rational:

To be consistent with the comments on the Section of 2.2.1 Dried Laver above

9.2 Sensory and Physical Examination

Proposed text:

Samples taken for sensory and physical examination shall be assessed by **appropriately trained** persons ~~trained in such examination and in accordance with ISO 4124.~~

Rationale:

There is no established or standardized training program for sensory and physical examination of laver products. Japan thinks that it should be sufficient to provide a training program that each country considers appropriate.

9.5.2 Titration

Proposed text:

According to AOCS Cd 3ad-63

Rational:

AOCS Cd 3d-63 is the latest analytical method.

10. DEFINITION OF DEFECTIVES

Proposed text:

A sample unit that fails to meet one or more of the applicable quality requirements, set out in Section 3.2 or that fails to meet the requirements, stated in Section **2.1 (b), (c), 2.2.1, 5, 6 and 7**, shall be considered as "defective". **In the case of sheet form, whether or not it is retail or non-retail product, a sample unit shall be considered as defective when at least one of the sheets contained in the same sample unit fails to meet one or more of the applicable quality requirements, set out in Section 3.2 or that fails to meet the requirements, stated in Section 2.1 (b), (c), 2.2.1, 5, 6 and 7.**

Rationale:

- To be consistent with the comments in 2.1, 2.1.1. and 6 above
- In the case of sheet form, multiple numbers of sheets are contained in one sample unit (e.g. package). If at least one of the sheets in the same sample unit fails to meet the requirements of this standard, the sample unit should be considered as defective.

11. LOT ACCEPTANCE

Proposed text:

A lot shall be considered as meeting the applicable ~~quality~~ requirements referred to in Section **2.1 (b), (c), 2.2.1, 3.2 and Section 5, 6 and 7** when the number of "defectives", as defined in Section 10, does not exceed the acceptance number (c) of the appropriate sampling plan with an AQL of 6.5.

Rationale:

To be consistent with the comments in 2.1, 2.1.1. and 6 above

11. LOT ACCEPTANCE

Comments:

We would like to discuss sampling plans at plenary in order to seek appropriate lot acceptance. A specific table should be included in this standard.

Reference:

The Committee on Methods of Analysis and Sampling (CCMAS) requests that "a sampling plan in any standard should not be a simple reference to the *General Guidelines on Sampling* (CAC/GL 50-2004), but could be a reference to a specific table in the Guidelines accompanied by an AQL" (paragraph 17, REP 14/MAS).