



31st January 2020

To: Chair, Codex Committee on Processed Fruits and Vegetables

From: International Fruit and Vegetable Juice Association (IFU)
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Subject: IFU Comments on Agenda item 8 Report of the electronic working group on matters referred from the codex committee on food additives (CCFA), including matters from CCFA49 and CCFA50

About IFU

The International Fruit and Vegetable Juice Association (IFU) has been for seventy years the only representative of the worldwide fruit and vegetable juice and nectar industry. The members of IFU are producers of juices and related products, associations, traders, machinery and packaging producers, public and private scientific institutions from around the world.

Introduction

The IFU would like to thank the committee for the report and the opportunity to provide comments.

Comments

Part I. Technological Justifications (Items 1-6)

Item 1

CCFA49 (2017) requested CCPFV to provide more conclusive replies concerning the technological justification for the use of “emulsifiers, stabilizers, thickeners” in general, and xanthan gum (INS 415) in particular, in food category (FC) 14.1.2 “Fruit and vegetable juices” and FC 14.1.3 “Fruit and vegetable nectar” generally and in specific sub-categories (see CCFA49 report, para 14(ii)).

The EWG was not able to resolve all the issues under items 1 and 6. The EWG believes that additional clarification is needed with respect to the proper classification of juice and nectar products with non-juice food additive ingredients, such as emulsifiers, stabilizers, thickeners (ESTs).

The EWG makes the following specific recommendations:

1) Pectins

- Recommend the addition of pectins (INS 440) at a use level of GMP in Tables 1 and 2 of the GSFA for FC 14.1.2.2 (vegetable juice) with note 35 and for FC 14.1.2.4 (concentrates for vegetable juice) with notes 35 and 127.
- Note 35 For use in cloudy juices only.
- Note 127 On the served to the consumer basis.

IFU Comments.

IFU supports this proposal

2) Request clarification on the proper classification of juice and nectar products with non-juice food additive ingredients

- Inform CCFA that there is a significant market presence of formulated juice and nectars with non-juice food additive ingredients, such as ESTs.
- Inform CCFA that a key to resolve some of the food additive issues is to get clarification on the proper classification of formulated juice/nectars with non-juice food additive ingredients, such as ESTs.
- Provide CCFA with suggestions from the EWG (see Appendix A). If another CCPFV EWG is established or a CCPFV physical meeting is held in the future, CCPFV could discuss the issue further. However, with uncertainties on the future of CCPFV, the EWG asks for CCFA's input.

IFU Comments.

If Juice based products exist on the market with added EST's then they are not in compliance with the GSFA categories for juices and nectars. It can be considered that these fit into the GSFA category 14.1.4/14.1.4.2 (Includes products based on fruit and vegetable juices; fruit and vegetable juice-based drinks).

It may be appropriate to revise the description in category 14.1.4.2 to make it clear this is where the products fit or create a separate category for juices and nectars with non-juice ingredients under category 14.1.4. On this basis there is no need to change the list of current additives for the juices and nectar category.

Clarification may of course be sought within the CCFA based on CCPFV comments as they are the committee responsible for the GSFA categories.

Furthermore, juices and nectars with added non-juice ingredients must be clearly described with a product name to distinguish such products from juices and nectars. We suggest for example;

X juice with added Y, or

X nectar with added Y

Where x is the name of the fruit or vegetable and Y is the name of the non-juice ingredient.

Item 5

CCFA50 requested guidance from CCPFV regarding the use of acidity regulators in general, and calcium lactate (INS 327) specifically, in FC 14.1.2.1 (Fruit juice) generally, and in Chinese plum juice specifically (see CCFA50 report, para 86 (ii) and CCFA50, CRD 2, page 12).

The EWG makes the following recommendations:

- In general, EWG believes that there is no technological justification for the use of calcium lactate as an acidity regulator for products under FC 14.1.2.1 (Fruit juice) with the possible exception of Chinese plum juice.
- However, the EWG needs more information to determine whether Chinese plum juice is a product under FC 14.1.2.2 (fruit juice) or FC 14.1.4 (water-based flavoured drinks).
- If Chinese plum juice is a product under FC 14.1.4 (water-based flavoured drinks), calcium lactate is already permitted for use as a Table 3 additive at GMP level.

IFU Comments.

We have provided to the EWG evidence (IFU comments 5-11-18) that the products we have seen on the market would be classified as drinks under the category 14.1.4 (water based flavoured drinks), please see the example in appendix 1. Has the EWG received any evidence that Chinese Plum products comply with category 14.1.2.2 (fruit juice)?

If not then we suggest that this is reported to the CCFA and the status quo is maintained.

Item 6

CCFA50 requested guidance from CCPFV regarding the use of acidity regulators in general and phosphates (INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v);542) and tartrates (INS 334, 335(ii), 337) specifically in FC 14.1.2.2 (Vegetable juice), FC 14.1.2.4 (Concentrates for vegetable juice), FC 14.1.3.2 (Vegetable nectar), and FC 14.1.3.4 (Concentrates for vegetable nectar) and the maximum use levels needed to achieve the intended technological effect (see CCFA50 report, para 86 (iii) and CCFA50, CRD 2, page 13).

The EWG makes the following recommendations:

- Add phosphates (INS 338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(ii); 452(i)-(v);542) and tartrates (INS 334, 335(ii), 337) in Tables 1 and 2 of the GSFA for FC 14.1.3.4 (concentrates for vegetable nectar) with notes 33, 40, 127 and with a maximum use limit of 1000 mg/kg as phosphorous.

Note 33: As phosphorous

Note 40: Pentasodium triphosphate (INS 451(i)) only, to enhance the effectiveness of benzoates and sorbates

Note 127: On the served to the consumer basis

- Inform CCFA that the remaining issues under item 6 cannot be resolved at this time until further discussion on the proper classification of juice and nectar products with non-juice food additive ingredients (see item 1 and Appendix A).

IFU Comments.

IFU Supports this proposal

Appendix 1.

Examples of Chinese Plum drinks.

Brand	Ingredient
Chivalry	Water, high fructose syrup, concentrated apple juice, concentrated plum juice, additives (CO2, citric acid, caramel, sodium cyclamate, Sodium Benzoate), flavors
Netease	Water, high fructose syrup, custer sugar, crystal sugar, hawthorn, plum, osmanthus, additives (citric acid, caramel, sodium cyclamate, sodium Benzoate), flavors
Jiulongzhai	Water, crystal sugar, plum, osmanthus, red rose, hawthorn, glycyrrhiza, tangerine peel, salt
Master Kong	Water, custer sugar, plum, tangerine peel, hawthorn, glycyrrhiza, salt, additive and flavor
Erbao	Water, fresh plum juice, custer sugar, brown sugar, high fructose syrup, glucose, additives (citric acid, DL-malic acid, sodium carboxymethyl cellulose, xanthan gum, sodium citrate, sodium D-isoascorbate)



商品信息 COMMODITY INFORMATION



品名：雪菲力烏梅果味汽水
 规格：600ml*24瓶
 保质期：12个月
 储藏方法：避免阳光直晒及高温，冷饮口味更佳
 产品标准号：GB/T10792
 配料：水、果葡糖浆、浓缩苹果汁、浓缩乌梅汁、
 食品添加剂（二氧化碳、柠檬酸、糖精钠）



酸梅有着防老化、益肝养胃、生津止渴、中和酸性代谢产物等功效。





一瓶琥珀光，甘甜扫心虫，透体沁凉



芳辰独饮

片片云带雨，曲曲麦陇山
千枝梅影，香沾衣袂，独倚阑干
新肥一番心事，付一瓣甘酸



严选小贴士

冰草冰饮，一瓣凉或甜
与冰糖搭配，风味更佳

营养成分表

项目	每100克	营养素参考值%
能量	142千焦	2%
蛋白质	0克	0%
脂肪	0克	0%
碳水化合物	8.2克	13%
糖	16克	1%

温馨提示

请置于阴凉干燥处保存，开盖后请冷藏并尽快饮用。

包装展示



净含量：350ml

