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Discussions on sugaring, rehydration, food additives (colour retention, preservatives and flavourings)

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Submitted by the delegation of the United States

The following information was submitted by the delegation of the United States.

Introduction

At the fifty-ninth session of the United Nations Economic Commission for Europe Specialized Section on Standardization of Dry and Dried Produce (UNECE D&DP) concern was expressed that all dried cranberries on the market were sugared and that the discussion on the proposed standard should be postponed until the working group had discussed the issue. The Chair noted that food additives e.g. flavoring agents, preservatives, etc., Ingredients (sugaring) and rehydration were substantial issues and therefore, should be discussed not only by the working group but by all members. It is expected that plenary session discussion on how these trade practices (sugaring, flavoring and other processes involving the use of food additives, as well as rehydration) are integrated within UNECE Dry and Dried Produce standard.

Background

UNECE D&DP standards falls into three categories, dried fruit, nut in the shell (inshell nuts) and nut kernels. However, dried fruit are more prone to rehydration, sugaring and food additive application. Sugaring of some dried fruit is undertaken to either make the finished product more palatable i.e. dried cranberries; or to allow free flowing i.e. dried grapes. In both cases, sugaring also achieves the role of a preservative. Food additive are applied to dried fruit either to retain color or as a preservative. Notwithstanding, changes in technology, trade practices, national legislations and consumer preferences mandate a comprehensive review of how food additives are addressed within UNECE D&DP standards.

Food Additive: According to Codex¹, food additive means “any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, the intentional addition of which to

¹ Codex General Standard For Food Additives (Codex Stan 192-1995) Preamble; Section 2a Definitions.

“food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result (directly or indirectly), in its or its byproducts becoming a component of or otherwise affecting the characteristics of such foods. The term does not include contaminants or substances added to food for maintaining or improving nutritional qualities.”

Currently, food additives indication within most UNECE Dried Produce standards is accompanied by a statement indicating that a slight smell of the additive e.g. SO₂ is not considered “abnormal”. This approach worked well in the past when the UNECE Dry and Dried Produce Section only standardized D&DP produced by its members in large quantities such as dried apples, nectarines, peaches, pears, plums and raisins. Currently UNECE Dry and Dried Produce Section are developing D&DP standards for a global range of produce with a range of food additives being used to perform functions of color retention, flavoring and preservatives.

Food Ingredient: *Based on the Codex definition, food ingredient means any substance, excluding a food additive, used in the manufacture or preparation of a food and present in the final product.* Food ingredient can be consumed solely as a food or for nutrition purposes.

Food Additives and Food Ingredients in Codex: Food additives and their safe limits for application in dried fruit being standardized the UNECE are found in food category 04.1.2.2 “Dried fruit” of the Codex General Standard for Food Additives (GSFA). Commodity standards developed by Codex, such as those for processed fruits and vegetables (which comprise dried produce); include a section on food additives. This section either includes a reference to the *General Standard for Food Additives* (GSFA) (CODEX STAN 192-1995) or prescribes specific additives. The latter practice is current being discouraged and so is gradually being discontinued. The GSFA sets forth the conditions under which food additives may be used in all foods, whether or not they have previously been standardized by Codex and defines the food categories or individual food items in which the use of food additives is not acceptable, or where use should be restricted. The GSFA is developed by the Codex Committee on Food Additives (CCFA) and only includes those food additives that have been evaluated by the FAO/WHO Joint Expert Committee on Food Additives (JECFA).

The Codex Alimentarius Commission was established by the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO) in 1963. The Commission’s main work is the development of international food standards, guidelines, and codes of practice to protect the health of consumers and ensure fair practices in the food trade.

Food additives in the GSFA accounts for maximum levels (numerical levels) and good manufacturing practices (GMP levels) depending on whether JECFA has established a numerical or “not limited (non numerical)” Acceptable Daily Intake (ADI) based on the public health concern associated with the food additive. The food category system of the GSFA is a tool for assigning food additive usage. The food category system applies to all foodstuffs. The food category descriptors are not to be legal product designations nor are they intended for labeling purposes.

Rehydration: - The restoration of fluid to something dehydrated². Dry produce is rehydrated either by steam (for larger fruits- apples peaches, pears and nectarines) and hot water (smaller fruits-on raisins). There are no specific labeling requirements for rehydrated produce for only water/moisture is being re –added.

² Webster Ninth New Collegiate Dictionary.

Possible Solutions

The UNECE D&DP Specialized Section needs to find a comprehensive solution for addressing ingredients food additives, in a comprehensive manner that is acceptable to all members; bearing in mind that the Specialized Section has limited scientific resources to both issues in a comprehensive manner. Therefore, a solution not requires the Specialized Section to undertake scientific evaluation of food additives and ingredients application in every standard being developed or revised is required. The following options are proposed:

1. Food Additives and Ingredients:

- I. Maintain the status quo food additive and ingredient application in the D&DP standards.
- II. In D&DP standards indicate a reference, only when necessary, to food category 04.1.2.2 “Dried fruit” of the Codex General Standard for Food Additives (GSFA).

2. Rehydration:

- III. Leave the issue as is- therefore, the standard implies rehydrated dried produce is covered.
 - IV. Within Section VI. Provisions Concerning Marking, make the indication of “rehydrated” optional.
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