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EUROPEAN UNION COMMENTS

Request for Comments at Step 3 of the Procedure on the Proposed Draft Standard for Panela (Codex document CL 2011/25-CS)

General Comments

The European Union and its Member States (EUMS) do not support the inclusion of the definition of "panela" in the Food Category System (FCS) of the GSFA (paragraph 4 of CL 2011/25-CS). The EU believes that the reference to "*panela*" or "*sugar cane juice products*" would be sufficient since the definition itself will be a part of the standard for panela.

In relation to the definition, the EUMS consider that the new standard for panela should distinguish panela from sugars that are defined in the Codex Standard for Sugars (CODEX STAN 212-1999). It is particularly necessary to ensure that the definition of panela does not overlap with the definitions of standardized sugars in the Codex Standard for Sugars such as soft brown sugar or raw cane sugar. As the proposed definition for panela is very broad difficulties in distinguishing panela from sugars can be expected. Such an overlap could be avoided if the definition of panela would clarify that it is a vital criterion of panela that sugar cane juice is just thickened in the manufacturing process and has not undergone any subsequent processing step when the thickened sugar cane juice is purified.

The EUMS note the proposal to include panela in the FCS subcategory 11.1.3. In this respect the EUMS would like to highlight that the subcategory 11.1.3 exclusively contains sugars covered by the Codex Stan 212-1999. The use of food additives is considerably limited in this subcategory. Therefore, adding panela directly to this subcategory does not seem to be reasonable and other options should be considered.

The appropriate categorisation of panela in the FCS would depend, inter alia, on food additives needed and technologically justified. A proper technological justification should be provided for all additives listed in the standard. At present the proposed draft standard refers also to food grade colorants (section 4.3) and flavourings. This kind of general reference is not appropriate. No colours and no limits are specified in the standard. Moreover, the use of food colours would be in clear conflict with the section 3.2.1 (colour) which states that panela may exist in various colours, depending, among other things, on the cane variety, the agro-ecological conditions and manufacturing process. The use of food colours would mislead the consumer in this respect. Furthermore, the use of food colours is not usual in raw or partially processed products (i.e. panela is unrefined whole cane sugar). Due to these reasons the EU questions the use of food colours in panela. The EU also questions the use of flavourings and would like to ask for clarification why flavourings are needed in unrefined cane sugar.

As for the classification under the FCS the EUMS are of the view that a new subcategory "11.1.3.3 Sugar cane juice products" could be considered. However, if the technological justification for the use of food colours and flavourings is provided then in the EUMS's

view, panela should fall under the category "11.4 Other sugars and syrups" which includes more processed products.

Specific Comments

The section 4.1 Acidity regulators contains INS 338 Phosphoric acid at GMP. The EUMS would like to note that phosphoric acid is not included in Table 3 of the GSFA, therefore, the maximum level should be expressed as a numeric value.

Section 7.1.2 requires a labelling statement "*aromatized with x*" or "*flavoured with x*" in order to

- a) specify any aroma or flavourings characterising the product and
- b) in case that an aroma or flavouring alters the characteristic aroma or flavour of the product.

The labelling statements will be the same in both cases, i. e. consumers will not see from the labelling whether the flavouring/aroma added results in a characteristic flavour/aroma or in an altered one. The intention would be to inform consumers about any addition of aroma/flavour without saying the reason for the addition (i. e. provide for a characteristic or alter the aroma/flavour).

Therefore, some explanation would be needed to clarify the intention of the labelling requirements:

7.1.2 The labelling shall specify any added aroma or flavouring characterising the product or altering the characteristic aroma or flavouring. The food name "Panela" shall be accompanied by the terms "aromatized with x" or "flavoured with x", as the case may be."

As a consequence the deletion of the last sentence in section 7.1.2 is proposed.