

Advisory Council on Food and Environmental Hygiene

Review on the Regulation of Preservatives and Antioxidants in Food

Purpose

The regulation of preservatives and antioxidants in food is governed by the Preservatives in Food Regulation (Cap. 132BD). To enhance protection for consumers, promote harmonisation of local and international food safety standards, and facilitate the food trade, the Government has reviewed Cap. 132BD and put forward proposed amendments. This paper highlights the major areas of the proposed amendments and invites Members' comments.

Background

2. Large-scale food processing requires the use of food additives to ensure that processed food remains safe and in good condition throughout its journey – from processing plants, through transport to warehouses and stores, and finally to consumers. Preservatives and antioxidants are food additives used to prolong the shelf-life of many foods so that they can be transported over long distances.

3. By adopting a “positive list” approach, Cap. 132BD stipulates that any food being imported, manufactured for sale, or sold may only contain the specified permitted preservative or antioxidant, and in the proportion that does not exceed the specified maximum permitted level (MPL). Currently, Cap. 132BD sets out 32 permitted preservatives / antioxidants with some 900 MPLs for specified food (i.e. 900 “additive-food” pairs).

4. One of the initiatives set out in the Policy Measures of the Chief Executive's 2022 Policy Address is to review and update by phases the food safety legislation relating to additives in food to further enhance food safety. The first phase covers preservatives and antioxidants in food.

Codex General Standard for Food Additives (GSFA)

5. Despite the benefits of using preservatives and antioxidants to improve food safety and reduce waste, they are permitted for use in food only after they have undergone stringent evaluation and are found not to present an appreciable health risk to consumers. At the international level, the safety assessment is conducted by the Joint Food and Agriculture Organization (FAO) / World Health Organization (WHO) Expert Committee on Food Additives (JECFA). The General Standard for Food Additives (GSFA) is formulated by the Codex Alimentarius Commission (Codex)¹, which is established by FAO and WHO. The Codex develops specific food additive standards based on sound scientific principles with a view to protecting the health of consumers and ensuring fair international food trade. The provisions of the GSFA are reviewed and revised from time to time by Codex in light of new scientific information on safety, changing technological development and justification for use.

Proposed Legislative Amendments

6. The Environment and Ecology Bureau and the Centre for Food Safety (CFS) of the Food and Environmental Hygiene Department have reviewed Cap. 132BD with reference to the latest Codex GSFA and its relevant commodity standards². The review keeps the Codex standards as the backbone, supplemented with the food pairs and their standards of relevant food additives of the Mainland and other major food trading partners, including the European Union (EU), the United States, Australia, New Zealand, Singapore, etc. We propose to amend Cap. 132BD in the following major areas –

- (A) To update the definitions of “preservative” and “antioxidant”;
- (B) To update the list of permitted preservatives / antioxidants in the “positive list”; and

¹ The Codex, established by FAO and WHO in 1960s, is the single most important international source of reference for consumers, food producers, processors, food control agencies and the international trade in developing food associated standards. Currently, Codex has 188 member countries and 1 member organisation (the EU) and is recognised by the World Trade Organization as the standard-setting body for food safety.

² Codex commodity standards define the physical and chemical characteristics of a specific product or food groups. The individual commodity standards would also cover standards for food additives, contaminants, hygiene, labelling, and methods of sampling and analysis as appropriate.

(C) To update / stipulate the MPLs of the permitted preservatives and antioxidants.

(A) To update the definitions of “preservative” and “antioxidant”

7. The current definitions of “preservative” and “antioxidant” in Cap. 132BD are set out at **Annex I**. To keep in line with international standards, we propose to update them with reference to the definitions of Codex. It should be noted that some of the substances currently excluded from the definitions, such as salt, sugar and alcohol, are in fact common food ingredients and can have preservative function. For the sake of clarity, especially from the trade perspective, these substances would continue to be categorically excluded from the definition of “preservative” in Cap. 132BD.

8. The updated definitions of “preservative” and “antioxidant” are proposed as follows –

preservative (防腐劑) means any substance, not normally consumed as food by itself nor normally used as a typical ingredient of the food, which is added to, or used in or on, food at any stage of food processing to prolong its shelf-life by protecting against deterioration caused by microorganisms, but does not include —

- (a) common salt (sodium chloride);
- (b) sugars;
- (c) alcohol or potable spirits, isopropyl alcohol, monoacetin;
- (d) herbs or hop extract;
- (e) spices or essential oils when used for flavouring purposes;
- (f) any substance added to food by the process of curing known as smoking; or
- (g) any vitamins and minerals added to food as nutrients.

antioxidant (抗氧化劑) means any substance, not normally consumed as food by itself nor normally used as a typical ingredient of the food, which is added to, or used in or on, food at any stage of food processing to prolong its shelf-life by protecting against deterioration caused by oxidation, but does not include any vitamins and minerals added to food as nutrients.

(B) To update the list of permitted preservatives / antioxidants in the “positive list”

9. There would be two major changes to the “positive list”. Firstly, 3 additives, namely copper carbonate, diphenyl and formic acid, will be removed from the 32 permitted preservatives/antioxidants currently being regulated. These 3 additives are not listed in the Codex GSFA and are not food additives currently permitted for use in the Mainland, Australia, New Zealand, the EU, Singapore and the United States. Since these 3 additives are no longer used in international trade, and there are suitable alternatives, the above amendment does not have much impact to the trade.

10. Besides, we propose to add 25 permitted additives (see **Annex II**). Currently, these 25 additives fall outside the definitions of “preservatives” and “antioxidants” in Cap. 132BD. Hence, their use by the trade as preservatives or antioxidants in food processing is currently not subject to the regulation of Cap. 132BD. Since, in the prevailing Codex GSFA, these 25 additives are permitted for use as preservatives and antioxidants and have relevant standards, and they are permitted for use by Hong Kong’s major food trading partners, we propose to put these additives under the new definitions of “preservatives” and “antioxidants” and include them in the “positive list”. Among them, 20 are Good Manufacturing Practice (GMP) additives (see paragraph 14 below).

11. We also propose to add another 4 food additives, which are currently not permitted for use. Among them, benzoyl peroxide, lauric arginate ethyl ester and stearyl citrate are listed in the Codex GSFA. Rosemary extract has been evaluated by JECFA to ensure its safety and it is permitted for use as an antioxidant in the Mainland, Australia, New Zealand, the EU and Singapore.

12. In summary, the number of permitted preservatives / antioxidants listed in the amended Cap. 132BD will increase from 32 to 58, comprising 29 currently being regulated and 29 newly added (see **Annex II**).

(C) To update / stipulate the MPLs of the permitted preservatives and antioxidants

13. We propose to update / stipulate the MPLs of the permitted preservatives and antioxidants for specified food (i.e. the different “additive-food” pairs – e.g. “benzoic acid-dried fruit” and “benzoic acid-candied fruit” are 2 different pairs). This is done with reference to the latest Codex GSFA and relevant commodity standards. The relevant standards of our major food trading partners, especially the Mainland, are also taken into consideration. The number of “additive-food” pairs will increase from currently some 900 to around 2 000. Among these 2 000

pairs, the MPLs of around 80% are adopted from Codex GSFA. The Mainland has set some “additive-food” pairs that are not covered by the Codex GSFA. Taking into account local dietary practices, we also propose to include these “additive-food” pairs, which account for around 17% of the total. The remaining “additive-food” pairs were adopted with reference to the standards of our other major food trading partners.

14. According to the proposed amendments, there would be 58 permitted preservatives / antioxidants. Among them, 24 are considered to be GMP additives under the Codex GSFA (including 4 additives listed as permitted preservatives / antioxidants under the existing Cap. 132BD, and 20 additives proposed to be put under the new definitions of “preservatives” and “antioxidants” and be included in the “positive list”). According to the Codex GSFA, they are acceptable for general use in foods when used at *quantum satis*³ levels and in accordance with GMP principles⁴; however, they are not applicable in certain food categories or individual food items. JECFA has conducted risk assessments on these GMP additives and concluded that the use of these additives in food does not represent a hazard to health. For the sake of clarity, we propose to set out these 24 preservatives / antioxidants in a separate list in the amended Cap. 132BD, and specify a list that such general use is not applicable to certain food categories or individual food items (see **Annex III**).

15. In addition, we propose to update the food category system under Cap. 132BD in light of the latest Codex GSFA. By adopting a food category system familiar to international food trading partners, it would facilitate them to understand the definition and scope of relevant MPLs for specified food so as to comply with the amended Cap. 132BD.

16. The amended Cap. 132BD would keep the standards of preservatives and antioxidants in food on par with international standards. Besides, putting more preservatives and antioxidants under regulation

³ “*Quantum satis*” means no quantitative limit is specified for the use of a food additive because its use in food does not represent a hazard to health. The additive shall be used in accordance with good manufacturing practice.

⁴ According to Codex, food additives shall be used under conditions of GMP, which include the following:

- (a) The quantity of the additive added to food shall be limited to the lowest possible level necessary to accomplish its desired effect;
- (b) The quantity of the additive that becomes a component of food as a result of its use in the manufacturing, processing or packaging of a food and which is not intended to accomplish any physical, or other technical effects in the food itself, is reduced to the extent reasonably possible; and
- (c) The additive is of appropriate food grade quality and is prepared and handled in the same way as a food ingredient.

would enhance clarity and offer more choices of permitted preservatives and antioxidants applicable to a wide range of food categories to the food trade. It would also improve consumer protection.

Other Amendments to the Provisions of Cap. 132BD

17. The existing section 3(8) of Cap. 132BD specifies that “any canned food may contain nisin, and any food may contain nisin introduced in the preparation of that food by the use of canned food containing nisin”. Since new MPLs for nisin in some specified food would be added under the proposed amendments, we would also propose to amend section 3(8) of Cap. 132BD to clarify that canned food (including canned or bottled) with applicable MPLs for nisin in specified food categories should comply with the relevant standards whilst other canned food may contain nisin.

18. The proposed amendments would also include new MPLs for some antioxidants in foods for infants and young children, which are set with reference to relevant Codex standards. These food additives are also permitted for use in foods for infants and young children in our major food trading partners, such as the European Union, Australia, New Zealand, the United States, Singapore, etc. However, the existing section 4 of Cap. 132BD specifies that food containing antioxidant is not to be recommended for babies and young children. We will make appropriate adjustment to section 4 so that the new MPLs for foods for infants and young children would not be compromised by section 4.

19. On the other hand, the food items “Liquid foam headings” and “Gelatin capsules” under the current Food Category 15 are proposed to be deleted from Cap. 132BD. This is because neither Codex nor our major food trading partners such as the Mainland, the EU, Singapore, Australia / New Zealand, United States and Canada, have set any maximum levels for these two items.

Public Consultation and the Way Forward

20. We have consulted the Legislative Council’s Panel on Food Safety and Environmental Hygiene as well as the Expert Committee on Food Safety on the review to Cap. 132BD. Members of both meetings in general supported the proposal. We have also launched a public consultation exercise starting from 29 May 2023. It will last for three

months until 28 August 2023. The consultation document is available at the websites of the EEB (https://www.eeb.gov.hk/food/en/press_and_publications/consultation/index.html) and the CFS (https://www.cfs.gov.hk/english/whatsnew/whatsnew_fstr/whatsnew_fstr_Proposed_Amendments_Preservatives_Food_Regulation.html). We organised three consultation forums in June to brief relevant stakeholders on the proposed amendments. We plan to introduce the legislative amendments to the Legislative Council in late 2023 / early 2024.

21. The proposed amendments, with Codex standards as the backbone, are expected to have no substantive impact to the trade and Hong Kong's food supply, as Codex standards are developed through thorough discussion among its members and adopted by consensus.

22. Recognising that the food trade and other stakeholders (such as private testing laboratories) may need time to make adjustments to comply with the amended Cap. 132BD, we propose that a transitional period of 18 months be given after enactment of the amended legislation. And before the amendments were to take effect, the CFS will issue updated user guidelines to assist the trade to better understand the amendments and facilitate their compliance. In the future, we would keep reviewing the standards of preservatives and antioxidants in food and other food safety standards from time to time in light of latest international developments to keep them on par with international standards.

Advice Sought

23. Members are invited to offer views on the proposed amendments to Cap. 132BD.

**Environment and Ecology Bureau
Food and Environmental Hygiene Department
Centre for Food Safety
July 2023**

**Current Definitions of “Antioxidant” and “Preservative” under
the Preservatives in Food Regulation (Cap. 132BD)**

Antioxidant means any substance that protects food against deterioration caused by oxidation (including fat rancidity and colour changes) but does not include –

- (a) lecithin;
- (b) ascorbic acid or salts or esters of ascorbic acid;
- (c) tocopherols;
- (d) erythorbic acid, citric acid, tartaric acid, phosphoric acid, lactic acid or the calcium, potassium or sodium salts of any such acid;
- (e) calcium, potassium or sodium salts of gluconic acid;
- (f) acetic and fatty acid esters of glycerol, lactic and fatty acid esters of glycerol or citric and fatty acid esters of glycerol; or
- (g) glucose oxidase derived from *Aspergillus niger* var.

Preservative means any substance which is capable of inhibiting, retarding or arresting the process of fermentation, acidification or other deterioration of food or of masking any of the evidence of putrefaction but does not include –

- (a) (*Repealed L.N. 85 of 2008*)
- (b) any permitted colouring matter;
- (c) common salt (sodium chloride);
- (d) lecithin, sugars or tocopherols;
- (e) nicotinic acid or its amide;
- (f) vinegar or acetic acid, lactic acid, ascorbic acid, citric acid, malic acid, phosphoric acid, polyphosphoric acid or tartaric acid or the calcium, potassium or sodium salts of any of the acids specified in this paragraph;
- (g) glycerol, alcohol or potable spirits, isopropyl alcohol, propylene glycol, monoacetin, diacetin or triacetin;
- (h) herbs or hop extract;
- (i) spices or essential oils when used for flavouring purposes;
- (j) any substance added to food by the process of curing known as smoking;
- (k) carbon dioxide, nitrogen or hydrogen when used in the packing of food in hermetically sealed containers;
- (l) nitrous oxide when used in the making of whipped cream; or
- (m) glucose oxidase derived from *Aspergillus niger* var.

Annex II

List of Currently Permitted Preservatives and Antioxidants under the Preservatives in Food Regulation (Cap. 132BD)

Item	Name
1.	Benzoates
2.	Butylated hydroxyanisole (BHA)
3.	Butylated hydroxytoluene (BHT)
4.	Calcium propionate [^]
5.	Dimethyl dicarbonate
6.	Dodecyl gallate
7.	Ethoxyquin
8.	Ethylenediaminetetraacetates
9.	Ferrous gluconate
10.	Guaiac resin
11.	Hexamethylene tetramine
12.	Hydroxybenzoates, para-
13.	Isopropyl citrates
14.	Lysozyme
15.	Natamycin (pimaricin)
16.	Nisin
17.	Nitrates
18.	Nitrites
19.	Octyl gallate
20.	ortho-Phenylphenols
21.	Potassium propionate [^]
22.	Propionic acid [^]
23.	Propyl gallate
24.	Sodium propionate [^]
25.	Sorbates
26.	Stannous chloride
27.	Sulphites
28.	Tertiary butylhydroquinone (TBHQ)
29.	Thiodipropionates
30.	Copper carbonate (proposed to remove)
31.	Diphenyl (proposed to remove)
32.	Formic acid (proposed to remove)

[^] Preservatives / antioxidants proposed to be listed as GMP additives (Total: 4)

List of Proposed Permitted Preservatives and Antioxidants

Item	Name
1.	Acetic acid, glacial [^]
2.	Ascorbic acid, L- [^]
3.	Ascorbyl esters
4.	Benzoyl peroxide (see paragraph 11 of the main text)
5.	Calcium acetate [^]
6.	Calcium ascorbate [^]
7.	Calcium lactate [^]
8.	Carbon dioxide [^]
9.	Citric acid [^]
10.	Citric and fatty acid esters of glycerol [^]
11.	Erythorbic acid (isoascorbic acid) [^]
12.	Glucose oxidase [^]
13.	Lauric arginate ethyl ester (see paragraph 11 of the main text)
14.	Lecithins [^]
15.	Nitrous oxide [^]
16.	Phosphates
17.	Potassium acetate [^]
18.	Potassium lactate [^]
19.	Rosemary extract (see paragraph 11 of the main text)
20.	Sodium acetate [^]
21.	Sodium ascorbate [^]
22.	Sodium diacetate
23.	Sodium erythorbate (sodium isoascorbate) [^]
24.	Sodium lactate [^]
25.	Stearyl citrate (see paragraph 11 of the main text)
26.	Tartrates
27.	Tocopherols
28.	Tricalcium citrate [^]
29.	Tripotassium citrate [^]

[^] Preservatives / antioxidants proposed to be listed as GMP additives
(Total: 20)

Annex III

List of Food Categories that the GMP Additives⁵ are still Governed by the Relevant Proposed MPLs (if available) in the Amended Cap. 132BD

No.	Food Category
1.1.1	Fluid milk (plain), including skimmed, partly skimmed and whole milk
1.1.2	Other fluid milk (plain) (e.g. plain reconstituted fluid milks, non-flavoured vitamin and mineral fortified fluid milks, lactose reduced milk and plain milk-based beverages), excluding products of food categories 1.1.1, 1.1.3 and 1.2 and their sub-categories (if applicable)
1.1.3	Fluid buttermilk (plain)
1.2	Fermented and renneted milk products (plain), excluding flavoured products of food category 1.1.4 and its sub-categories (if applicable), and desserts of food category 1.7 and its sub-categories (if applicable)
1.2.1	Fermented milks (plain)
1.2.1.1	Fermented milks (plain), not heat-treated after fermentation
1.2.1.2	Fermented milks (plain), heat-treated after fermentation
1.2.2	Renneted milk (plain), excluding flavoured renneted milk products of food category 1.7 and its sub-categories (if applicable)
1.4.1	Pasteurized cream (plain)
1.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)
1.6.3	Whey cheese
1.6.6	Whey protein cheese (e.g. ricotta cheese)
1.8.2	Dried whey and whey products, excluding whey cheeses of food category 1.6.3 and its sub-categories (if applicable)
2.1	Fats and oils essentially free from water
2.1.1	Butter oil, anhydrous milkfat, ghee
2.1.2	Vegetable oils and fats
2.1.3	Lard, tallow, fish oil and other animal fats
2.2.1	Butter

⁵ Among the 58 preservatives / antioxidants proposed to be included in the amended Cap. 132BD as listed in Annex II, 24 are proposed to be set out in the list of GMP additives which are acceptable for use in foods (except in food categories listed in Annex III) when used at *quantum satis* levels and in accordance with GMP principles. The use of such additives in food categories listed in Annex III is governed by the relevant proposed MPLs (if available) in the amended Cap. 132BD.

No.	Food Category
2.2.1.1	Butter for manufacturing purposes
4.1.1	Fresh fruit
4.1.1.1	Untreated fresh fruit
4.1.1.2	Surface-treated fresh fruit
4.1.1.2.1	Apples
4.1.1.2.2	Pears
4.1.1.3	Peeled or cut fresh fruit, including fresh shredded or flaked coconut
4.2.1	Fresh vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds
4.2.1.1	Untreated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes (including soybeans), and aloe vera), seaweeds, and nuts and seeds
4.2.1.2	Surface-treated fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds
4.2.1.3	Peeled, cut or shredded fresh vegetables, (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds
4.2.2.1	Frozen vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweeds, and nuts and seeds
4.2.2.7	Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweed products, excluding fermented soybean products of food categories 6.8.6, 6.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3, and their sub-categories (if applicable)
6.1	Whole, broken, or flaked grain, including barley, corn, oats, rice, sorghum, soybeans and wheat
6.2	Flours and starches (including soybean powder)
6.2.1	Flours
6.2.2	Starches
6.4.1	Fresh pastas and noodles and like products
6.4.2	Dried pastas and noodles and like products
8.1	Fresh meat, poultry and game
8.1.1	Fresh meat, poultry and game, whole pieces or cuts
8.1.2	Fresh meat, poultry and game, comminuted

No.	Food Category
9.1	Fresh fish and fish products, including molluscs, crustaceans and echinoderms
9.1.1	Fresh fish
9.1.2	Fresh molluscs, crustaceans and echinoderms
9.2	Processed fish and fish products, including molluscs, crustaceans and echinoderms
9.2.1	Frozen (including fresh and partially cooked) fish, fish fillets and fish products, including molluscs, crustaceans and echinoderms (e.g. frozen clams, frozen cod fillets, frozen crabs, frozen finfish, frozen lobsters, frozen prawns, frozen fish roe and frozen surimi)
9.2.2	Frozen uncooked battered fish, fish fillets and fish products, including molluscs, crustaceans and echinoderms (e.g. frozen raw breaded shrimps and frozen batter-coated fish fillets)
9.2.3	Frozen uncooked minced and creamed fish products, including molluscs, crustaceans and echinoderms
9.2.4	Cooked and/or fried fish and fish products, including molluscs, crustaceans and echinoderms
9.2.4.1	Cooked fish and fish products (excluding frying), including cooked surimi, cooked fish paste and cooked fish roe
9.2.4.1.1	Cooked fish balls and cakes (excluding frying)
9.2.4.2	Cooked molluscs, crustaceans and echinoderms (excluding frying)
9.2.4.2.1	Cooked mollusc, crustacean, and echinoderm balls and cakes (excluding frying)
9.2.4.3	Fried fish and fish products, including molluscs, crustaceans and echinoderms
9.2.4.3.1	Fried fish balls and cakes, including molluscs, crustaceans and echinoderms
9.2.5	Smoked, dried, fermented, and/or salted fish and fish products, including molluscs, crustaceans and echinoderms
9.2.5.1	Dried shredded fish, including molluscs, crustaceans and echinoderms
10.1	Fresh eggs
10.2.1	Pasteurized and chemically preserved (e.g. by addition of salt) liquid egg products, including whole egg, egg yolk and egg white
10.2.2	Pasteurized and frozen egg products, including whole egg, egg yolk and egg white

No.	Food Category
11.1	Refined and raw sugars
11.1.1	White sugar, dextrose anhydrous, dextrose monohydrate, fructose
11.1.2	Powdered sugar, powdered dextrose
11.1.3	Soft white sugar, soft brown sugar, glucose syrup, dried glucose syrup, raw cane sugar
11.1.4	Lactose
11.1.5	Plantation or mill white sugar
11.2	Brown sugar (e.g. Demerara sugar), excluding products of food category 11.1.3 and its sub-categories (if applicable)
11.3	Sugar solutions and syrups, also (partially) inverted, including treacle and molasses, excluding products of food category 11.1.3 and its sub-categories (if applicable)
11.4	Other sugars and syrups (e.g. xylose, maple syrup and decorative sugar toppings)
11.5	Honey
12.1	Salt and salt substitutes
12.1.1	Salt
12.1.2	Salt substitutes
12.2.1	Herbs and spices, excluding spices
12.2.1.1	Curry paste
13.1	Infant formulae, follow-on formulae, and formulae for special medical purposes for infants
13.1.1	Infant formulae
13.1.2	Follow-up formulae
13.1.3	Formulae for special medical purposes for infants
13.2	Complementary foods for infants and young children, excluding products of food category 13.1 and its sub-categories (if applicable)
14.1.1	Bottled or packaged drinking waters
14.1.2	Fruit and vegetable juices, excluding beverages based on fruit and vegetable juices of food category 14.1.4.2 and its sub-categories (if applicable)
14.1.2.1	Fruit juice
14.1.2.1.1	Grape juice products (unfermented, intended for sacramental use)
14.1.2.2	Vegetable juice
14.1.2.3	Concentrates for fruit juice
14.1.2.4	Concentrates for vegetable juice

No.	Food Category
14.1.3	Fruit and vegetable nectars
14.1.3.1	Fruit nectar
14.1.3.2	Vegetable nectar
14.1.3.3	Concentrates for fruit nectar
14.1.3.4	Concentrates for vegetable nectar
14.1.5	Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, including ready-to-drink products, their mixes and concentrates, and treated coffee beans for the manufacture of coffee products, excluding ready-to-drink cocoa of food category 1.1.4 and cocoa mixes of food category 5.1.1 and their sub-categories (if applicable)
14.1.5.1	Coffee extract, solid
14.2.3	Grape wines