



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS**

Fifth Session

Kochi, Kerala, India, 26 - 30 April 2021

DRAFT STANDARD FOR DRIED OREGANO

Comments at Step 6 (Replies to CL 2019/98/OCS-SCH)

Comments of Cuba, Chile, Colombia, European Union, Iraq, United States of America, IOSTA and CCTA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2019/98/OCS-SCH issued in October 2019. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

3. As a result of the rescheduling of the CCSC5 session from 21-26 September, 2020 to 26-30 April 2021, the timelines for the EWG on dried Oregano were adjusted. The EWG is continuing its work including addressing the attached comments.

DRAFT STANDARD FOR DRIED OREGANO
Comments at Step 6 (Replies to CL 2019/98/OCS-SCH)

TEXT/COMMENT	MEMBER/OBSERVER - JUSTIFICATION
<p>Cuba welcomes the opportunity to raise comments regarding the DRAFT STANDARD FOR DRIED OREGANO and expresses the following: 2 DESCRIPTION Table 1.Dried culinary herbs covered by this Standard We consider that in this Draft Standard the clove basil must be covered, as it is the one most used in the country. Clove basil. Ocimum gratissimum. 3.2.2 Remove the word can and keep the word shall.</p>	Cuba
<p>We agree with draft standard for dried Oregano without any comments.</p>	Iraq
<p>Table 1. Dried culinary herbs covered by this Standard Chile proposes to eliminate satureja montana and poliomintha longiflora since they do not correspond to the organum genus, nor to the lipia genus as it was agreed to leave only those 2 genres at the last meeting.</p>	Chile
<p>2.2 Styles There are regional differences regarding what is considered Oregano. Mexican Oregano is not recognized as Oregano in the EU.</p>	IOSTA
<p>Dried oregano shall can have a characteristic odour and flavour, varying according to the chemical strain of the main components of the volatile oil (carvacrol and/or thymol), which may vary depending on geo-climatic factors/conditions.Dried oregano shall be free from any foreign odour or flavour and especially from mustiness.Dried oregano shall have a characteristic colour varying from pale greyish yellow green to dark green.</p>	Colombia We deem appropriate to keep the term "shall" and remove the term "can", in order to add clarity to the text.
<p>Dried oregano shall can have a characteristic odour and flavour, varying according to the chemical strain of the main components of the volatile oil (carvacrol and/or thymol), which may vary depending on geo-climatic factors/conditions.Dried oregano shall be free from any foreign odour or flavour and especially from mustiness.Dried oregano shall have a characteristic colour varying from pale greyish yellow green to dark green.</p>	CCTA ... composition/chemical variety... Instead of ... chemical strain... ... of mustiness..
Table 2. Physical requirements for whole/crushed/rubbed and ground/powdered oregano (allowed tolerance for defects)	
<p><u>Other excreta</u> In the parameter <u>other excreta</u> the values should be 1.0, 1.0 and 2.2 respectively</p>	Chile .
<p><u>Visual mold and Mammalian Excreta</u> Visual mold and Mammalian Excreta not in line with ASTA standard for Grade I and Grade II Ash and volatile oil requirements are more stringent for Codex than ISO. In general, IOSTA supports the harmonization of ISO and Codex standards.</p>	IOSTA
<p>We are unclear how the figures for Foreign matter content were derived. Please provide the reference for this parameter.</p>	USA
<p>Include prohibitions: Regarding visual mold/insects should be Nil. No percentage of visual mold/insects should be allowed in any oregano species of any origin, due to sanitary and phytosanitary risks.</p>	Colombia
<p>Include prohibitions:Regarding insect fragments should be Nil. No percentage of insect fragments should be allowed in any oregano species of any origin.</p>	Colombia

TEXT/COMMENT	MEMBER/OBSERVER - JUSTIFICATION
<p>Include prohibitions:Regarding dead insects should be Nil.</p> <p>No percentage of dead insects should be allowed in any oregano species of any origin, due to sanitary and phytosanitary risks.</p>	Colombia
<p>7 WEIGHTS AND MEASURES</p>	<p>Colombia In mentions details regarding packages, but it does not mention anything related with weights and measures</p>
<p>Packages shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.</p>	Colombia
<p>8.2.2 The name of the product shall include an indication of the trade name, varietal types as described in Table 1 and the style as described in Section 2.2.</p>	<p>USA We agree with 8.2.2. and further clarify our support that the scientific name is not included in the labeling.</p>
<p>8.3 Country of harvest/origin</p>	
<p>The U.S. supports using country of origin, which is the term used in CCFL. and the year and county of harvest could be optional. The difference between "country of origin" and "country of harvest" is unclear and CCFL expressed some confusion over these terms. Specifically, the concerns were that the new language may not be consistent with the Country of Origin text in the General Standard of Labeling of Pre-Packaged Foods (GSLPF), below:</p> <p>4.5 Country of origin</p> <p>4.5.1 The country of origin of the food shall be declared if its omission would mislead or deceive the consumer.</p> <p>4.5.2 When a food undergoes processing in a second country which changes its nature, the country in which the processing is performed shall be considered to be the country of origin for the purposes of labelling.</p> <p>Thus, if both terms are kept, the text should make distinctions between the terms and be in accordance with the GSLPF.</p>	USA
<p>8.3.1 Country of origin/country of harvest, year of harvest shall be indicated and the region of production may be indicated.</p>	Colombia
<p>8.3.1 Country of origin/country of harvest shall be indicated and the region of production may be indicated.</p>	<p>Colombia It's important to mention the year of harvest</p>
<p>8.4 Comercial presentationidentification</p>	<p>Colombia There is ambiguity if the word "identification" is used it is suggested to use the word "presentation"</p>
<p>9.1 Methods of analysis</p>	
<p>Methods for mould visible and insect damage should be added to this table.</p> <p>1. <u>Mould visible</u> Method V-8 Spices, Condiments, Flavors and Crude Drugs (Macroanalytical Procedure Manual, FDA Technical Bulletin Number 5) http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm084394.htm#v-32 Visual examination IV</p> <p>2. <u>Insect Damage</u> ISO 927 Visual Examination I</p>	USA

TEXT/COMMENT	MEMBER/OBSERVER - JUSTIFICATION
General comment - According to the Procedural Manual and guidance from CCMAS, only type I method can be selected unless identical.	USA
9.2 Sampling plan	
Other Excreta: We support keeping this method and parameter	USA
Insect Damage: please add AOAC 975.49 as a Type IV method	USA
Moisture- ISO 930 and ATSA 2.0 seem to be based on the same principle and it unclear if they are identical. Only one type II method should be selected.	USA

Comments of European Union

Mixed Competence.

Member States Vote.

The European Union and its Member States (EUMS) would like to submit the following comments:

1. General comments

The EUMS will limit their comments to the sections of the standard identified by the Committee in the REP19/SCH, notably section 2, 8 and sections/wording into square brackets.

2. Specific comments

2.1 Section 2.1 – Product definition

As Table 1 plays a crucial role in the standard for oregano, the EUMS are in favor of retaining Table 1, with the indication of “generic name”, “trade name” and “scientific name”.

It is the understanding of the EUMS that the inclusion of the different species/varieties of oregano in Table 1 is based on the chemotype of the essential oil(s).

The EUMS note that during CCSC 4 the wording “...including but not limited to...” was added to paragraph 2.1 “Product definition”. This implies that the list provided for in Table 1 is not exhaustive and gives the possibility to classify as oregano species/varieties not previously discussed by the EWG and/or the Committee, and which may not have the chemical characteristics of oregano listed in Table 1. Therefore, the EUMS would favour the deletion of the sentence “...including but not limited to...”.

2.2 Section 3.2.2 - Odour, flavour and colour

The EUMS would suggest retaining a reference regarding the need to guarantee the commodity is free from any form of adulteration.

2.3 Section 5.1 – Contaminants

The EUMS consider that the reference to the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014) should be retained. The dietary exposure to PAs should be as low as possible due to the potential health-threatening effects that can be caused by ingestion of these toxins via feed or food. To achieve this, and in consideration of the high level of contamination with PAs found in oregano, management practices aimed at the prevention and reduction of contamination of food and feed with PAs must be undertaken.

2.4 Section 8.2 –Name of the product and section 8.3 - Country of harvest/origin

2.4.1 Section 8.2.2 - The EUMS support the inclusion of the scientific name of the products traded. In addition, the Committee should clarify what is intended by “varietal type”.

2.4.2 Section 8.3.1 – The EUMS consider that it should be clarified whether both the country of origin and the country of harvest are to be indicated on the label, or whether the indication of either the country of origin or the country of harvest could suffice.

The EUMS support maintaining the indication of the region of production as optional.