

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 4, 5, 6 and 7

CX/SCH 15/02 CRD/8
Original Language Only

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

Second Session

Goa, India, 14 – 18 September 2015

Comments of European Union

Agenda Item 4, Proposed Draft Standard for Black, White and Green Pepper (BWG Pepper), CX/SCH 15/02/04

**Mixed competence
Member States vote**

General comments

The lay-out and provisions of standards for different herbs and spices will need to be aligned as far as possible.

Specific comments

1. Scope

Modify the 2nd sentence as follows:

"This standard applies to dried ~~or dehydrated~~ peppers ..."

Rationale: The terms "dried" and "dehydrated" are synonyms.

2.1 Product Definition

The terms "fruits and berries" are used in this section. It would seem appropriate to use either "fruits" or "berries" but not both of them. Probably the term "berries" is preferable as it is also used in the scope.

Modify point a(i) as follows:

Black pepper – obtained from immature ~~dried fruits or berries~~ after drying/fermentation"

Rationale: Black pepper is obtained from immature berries after drying/fermentation, not from mature ones.

Modify point a(ii) as follows:

"White pepper – obtained from fully mature or ripe ~~fruits or berries~~ or from black peppers, their pericarp removed"

Rationale: White pepper can also be obtained from black pepper by decortication.

Modify point a(iii) as follows:

"Green pepper – obtained from immature ~~or mature~~ green pepper ~~fruits or berries~~ prepared under controlled conditions"

Rationale: Green pepper cannot be obtained from fully matured pepper berries because they are red.

Modify point b as follows:

~~"Fruits or Berries~~ are processed in an appropriate manner, by undergoing operations such as threshing, decorticating, cleaning, soaking, washing, drying ~~or dehydrating~~, grinding, crushing, sieving and sifting; before the final packaging and storage."

Rationale: The terms "drying" and "dehydrating" are synonyms.

3.2 Quality Factors

Concerning the basic parameters of BWG peppers in Table 1, in the description of general size/shape (3.2.1) of white pepper, "spherical shape" can be deleted as it is synonymous to "globular shape".

Concerning the physical and chemical characteristics in Tables 2, 3 and 4, the following amended figures are suggested for whole and ground BW peppers as they are in line with the current good manufacturing and trading practices:

Physical Characteristics for whole black pepper	Grade I	Grade II	Grade III
Light berries % (m/m) max.	0.5	2.0	5.0
Extraneous matter % (m/m) max.	Nil	1.0	2.0
Chemical Characteristics for whole black pepper	Grade I	Grade II	Grade III
Moisture content % (m/m) max.	12.0	12.0	12.0
Total ash % (m/m) max. on dry basis	7.0	7.0	7.0
Nonvolatile ether extract % (m/m) min. on dry basis	6.0	6.0	6.0
Volatile oils % (m/m) min. on dry basis	2.0	2.0	2.0
Piperine content % (m/m) min.	3.5	3.5	3.0

Physical Characteristics for whole white pepper	Grade I	Grade II	Grade III
Extraneous matter % (m/m) max.	0.25	0.25	0.5
Black berries/corns % (m/m) max.	5.0	10.0	10.0
Broken berries % by weight max.	3.0	3.0	3.0
Chemical Characteristics for whole white pepper	Grade I	Grade II	Grade III
Moisture content % (m/m) max.	12.0	12.0	12.0
Total ash % (m/m) max. on dry basis	3.5	3.5	3.5
Volatile oils % (m/m) min. on dry basis	1.5	1.5	1.5
Piperine content % (m/m) min. on dry basis	4.0	4.0	3.5
Acid-insoluble ash % (m/m) max. on dry basis	0.3	0.3	0.3

Chemical Characteristics for ground BW peppers	black	white
Moisture content % (m/m) max.	12.0	12.0
Total ash % (m/m) max. on dry basis	7.0	3.0
Volatile oils % (m/m) min. on dry basis	1.5	0.7
Acid-insoluble ash % (m/m) max. on dry basis	1.4	0.3

Concerning the chemical characteristics of green peppers in Table 3, the EUMS have the following comments:

- The total ash content should be corrected to take count of the salt content (max. 3.0%). Dried green pepper is the black pepper before fermentation. Therefore, the total ash content in green pepper should be the same as in black pepper (max. 7.0% on dry basis) but increased by its maximum salt content of 3.0%. Thus, the total ash content of dried whole green pepper should be changed from 5.0% to 10.0%.
- Due to the fact that whole dried green pepper is the black pepper before fermentation the content of nonvolatile ether extract should be comparable with black pepper. Thus, a nonvolatile ether extract of min. 0.3% on dry basis seems very low compared to a nonvolatile ether extract content of min. 7.0% in black pepper.
- There is no technological justification for the use of sulphur dioxide (SO₂) as a food additive in green pepper. Therefore, the maximum level of 500 mg/kg suggested for sulphur dioxide in green pepper in Table 3 should be deleted.

Agenda Item 5, Proposed Draft Standard for Cumin, CX/SCH 15/02/05

**Mixed competence
Member States vote**

General comments

The lay-out and provisions of standards for different herbs and spices will need to be aligned as far as possible.

Specific comments

2.2 Styles

Modify the order of the styles as follows:

- a) Whole
- b) Ground Cracked
- c) Cracked Ground

Rationale: The particle size of ground cumin is smaller than the particle size of cracked cumin.

3.2.5 Chemical Characteristics

The EUMS suggest deleting the content of cumin aldehyde as a quality parameter as it can vary a lot depending on the origin and harvesting conditions.

5 Contaminants

Delete the words "and/or veterinary drugs" in paragraph 5.2 as MRLs for veterinary drugs are not applicable to spices and herbs.

8.2.2 Add the following sentence in section 8.2.2.

"It may also include the method of production, i.e. cultivated, organic, or wild."

Rationale: It would be useful to include the production method as an optional labelling provision.

Agenda Item 6, Proposed Draft Standard for Oregano, CX/SCH 15/02/06

**Mixed competence
Member States vote**

General comments

The lay-out and provisions of standards for different herbs and spices will need to be aligned as far as possible.

Specific comments

2.2 Styles

The style "whole leaf" should be kept as it is recognized in trade.

The styles should be bound to both the aperture size of a sieve and a standardized mesh, because both are used and they are comparable.

3.2.2 Odour, flavor and color

It would be useful to link the flavour to the chemical components of the volatile oil. Thus square bracketed sentence should be retained.

Flavour should be described with: fragrant, warm, pungent, and **slightly** bitter.

3.2.4.1 Chemical Characteristics

In relation to the content of the volatile oil in oregano, there should be a substantial difference between the different styles and between the different grades/classes of oregano. Hence, the following values should be inserted for the volatile oil content:

PARAMETERS	Requirements for Whole or Crushed/Rubbed styles			Requirements for Ground /Powdered styles		
	Extra	Class/ Grade I	Class/ Grade II	Extra	Class/ Grade I	Class/ Grade II
Volatile oil ml/100 g (dry basis) minimum	2,5	2.00	1.75	1.75	1.50	0.8

3.2.4.2 Physical Characteristics

Footnote (a) of Table 2 reads "The proportion of stalks which have dimensions exceeding 7 mm in length and 3 mm in diameter shall not be more than 50 % (m/m) (w/w) of total extraneous matter content". The value of 50 % is too high and should be reduced to 5 %. This would bring the provision in line with the corresponding provision in the proposed draft standard for thyme.

5. Contaminants

Section 5.3 should be deleted as the issue of dehydration factors should be addressed in the horizontal Codex provisions on contaminants.

9.2.1

This section should be complemented as follows:

The name of the product shall be as defined in Section 2 Product Definition. It may also include an indication of the **species and** varietal types and of the style as described in Section 2.2. as well as of the product classification, as described in Section 3.2. **In case of products consisting of blends of different species, the name of the product may be followed by the taxonomic names of all species in order of descending quantity.**

9.2.2 Styles

This section can be deleted as the labelling of styles is already covered by section 9.2.1.

10. Methods of analysis and sampling

In relation to moisture, appropriate methods are ISO 760:1978 (distillation) and AOAC 2001.12 which are based on the Karl Fischer titration principle and are appropriate for the determination of moisture content in dried parts of plants high in moisture (1-15%). The application of methods ISO 939:1980 or AOAC 925.40 in dried herbs with high content of volatile oil may result in determining higher moisture content than the actual one and hence these methods should be deleted.

In relation to volatile oils, appropriate methods are ISO 6571:2008 and AOAC 962.17 but not AOAC 948.22 which should be deleted. The latter refers to the determination of the fat content in nuts and nut products using Soxhlet extraction while in herbs the preferable method is distillation.

It should be considered whether the current sampling plan could be replaced by a reference to ISO 948:1989 spices and condiments – sampling plan.

Agenda Item 7, Proposed Draft Standard for Thyme, CX/SCH 15/02/07

**Mixed competence
Member States vote**

General comments

The lay-out and provisions of standards for different herbs and spices will need to be aligned as far as possible.

Specific comments

1 Scope

The scope should be modified as follows to bring it in line with the corresponding provision in the proposed draft standard for oregano:

"This Standard applies to dried leaves and flowers of ~~any wild or commercially cultivated variety (cultivar)~~ **species or hybrids of the genus** of thyme (*Thymus* L spp.) of the Lamiaceae family offered for industrial food production and for direct consumption, including for catering purposes or for repackaging if required. It does not apply to the product when indicated as being intended for further processing."

A new section "2.3 Varietal types" should be added and it should read:

"Any wild or commercially cultivated variety (cultivar) of Thymus L suitable for processing."

3.2.2 Odour, flavor and color:

The square bracketed sentence on colour should be deleted as colour of thyme is highly variable and is therefore not suitable for a quality parameter.

3.2.3 Chemical and Physical Characteristics

The following values are suggested for chemical and physical parameters as they are in line with the current trading practices:

a) Moisture	≤ 12,0
b) Total ash	≤ 12,0
c) Acid insoluble ash	≤ 3,2
d) Volatile oil	≥ 1,0
e) Extraneous matter	≤ 5,0 %
f) Foreign matter	practically absent

The square bracketed provision g on mold should be deleted as mold is included in foreign matter.

5. Contaminants

Delete the words "and/or veterinary drugs" in paragraph 5.2 as MRLs for veterinary drugs are not applicable to spices and herbs.

9. Methods of analysis and sampling

It should be considered whether the current sampling plan could be replaced by a reference to ISO 948:1989 spices and condiments – sampling plan.