

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5

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

3rd Session

Chennai, India, 6 - 10 February 2017

DRAFT STANDARD FOR THYME

Comments at Step 6

(Comments of European Union, Ghana, India, Malaysia, Nigeria and Thailand)

EUROPEAN UNION

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

Section 3 - Composition and Quality Factors

3.2.3. Physical Requirements – Table 1: Foreign matter should not be present in the products for direct consumption. We would suggest to replace 0.5 % with a value as low as practicable. It is therefore proposed a value of **0.1%**.

Section 4 - Food additives

Anticaking agents are not technologically justified in dried/powdered thyme. It is therefore suggested to delete Section 4 entirely.

Section 8 - Labelling

8.2 Name of the Product

8.2.3 (NEW)

"The country of harvesting **may** be indicated."

The aim of the voluntary indication of country of origin is to draw consumer's attention to the quality characteristics of the product. The sensory profile and the quality of thyme vary considerably depending on the region of origin, even when the same species or cultivars are used. Consumers should be adequately informed of the origin of the product as their perception of what thyme is and their expectations depend largely on the quality profile to which they are accustomed

Section 9 - Methods of analysis and sampling

9.1 Methods of Analysis

The correct reference to the method for moisture determination should be **ISO 939:1980**, instead of ISO 938:1980.

GHANA

Section 1: Scope

Ghana suggests that the scope be maintained as well as the phrase "[it does not apply to the product when indicated as being intended for further processing]".

Rationale: Because it provides more clarity to the definition

Section 9.2: Sampling Plans

Ghana refers to Sampling Plan 1 in the table in Appendix I

INDIA

Annex II

I. Para 1 Scope

We propose to correct the statement in square brackets as follows:

“It does not apply to the product when indicated as being intended for ~~further processing~~ **industrial processing**”.

II. Para 3.4 - Lot Acceptance

The term “**excessively**” is **subjective** and may be interpreted differently by different stakeholders.

MALAYSIA

1. SCOPE

a) Species covers by Draft Standard for Dried Thyme

Malaysia notes that dried thyme covers by this draft standard is too general where there are many species under *Thymus* spp. of the Lamiaceae family. Malaysia proposes that the Scope should be limited to species of dried thyme used for culinary purposes only.

b) Terms “industrial food production” and “further processing”

Malaysia is of the view that the definition for the terms “industrial food production” and “further processing” should be clearly defined for better clarity and understanding.

In addition, Malaysia supports if USA’s approach and recommendation as in the Draft Standard for Cumin is apply for Draft Standard for Dried Thyme, provided the term “industrial processing” is clearly defined.

“This Standard applies to offered as a condiment and for direct human consumption, commercial food processing or for repackaging if required. It excludesintended for industrial processing.”

NIGERIA

Nigeria supports the development of the Standard for Thyme taking into consideration, the comments on the Quality Factors as outlined below:

Scope

Nigeria proposes that the exclusion clause [*It does not apply to the product when indicated as being intended for further processing.*] should be expunged.

This is to promote trade. In addition, the scope of the standard does not apply for the products when indicated as being intended for further processing, hence the statement is not appropriate.

THAILAND

General Comments on Agenda Item 4 -7: Draft Standard and Proposed Draft Standard

In general, Thailand has no objection on the Draft Standard of Cumin and Thyme and Proposed Draft Standard of BWG pepper and Oregano. However, we do consider that all aforesaid documents should be in consistent with the adopted codex standard of other Codex committees. In addition, we would like to provide some suggestions as described below:

SECTION 1: SCOPE

1. The scope of the commodity standards for spices and culinary herbs should be similar in writing style, in which the main objective is for direct (human) consumption, whereas industrial food processing, catering purpose or repacking are the processes eventually intended for human consumption.
2. The phrase “intended for further processing” should be used as it has been commonly used in various adopted codex standard and the meaning is clearly defined as the processing of a product from its original state to other kinds of products.
3. The proposed definitions for “further processing” and “industrial processing” are unnecessary. The term “further processing” may cause confusion against “post-harvesting” activities, while the meaning of “industrial processing” is ambiguous because it is usually applied in a very large scale production. In fact, small scale production is also applied for the processing of dried spices and herbs such as homemade essential oils or incense.

4. Thailand would like to recommend the following template of revised Scope as follows: “This Standard applies to of the Family, offered as a condiment or an ingredient and for direct consumption, industrial food processing or repacking, if required. It does not apply to the product when indicated as being intended for further processing.”

SECTION 3.2.2: INFESTATION

1. This section (infestation) should specify only for live insect by referring to the definition of the term “infestation (of a commodity)” in International Standard for Phytosanitary Measure (ISPM) No.5 Glossary of phytosanitary terms as follows: “**infestation (of a commodity)** means presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection.”

2. The dead insects, insect fragments and rodent contamination should be identified as filth and these parameters should be grouped into a new section, “Defects and allowances”.

SECTION 3.2.4: PHYSICAL CHARACTERISTICS

1. We disagree with the inclusion of extraneous matters, foreign matters, insect damages or mold visible which specified under the section physical characteristics because all of these parameters are [undesirable](#). In fact, they should be defined in section “defects” as the minimum acceptance is required. So, we would like to propose a new section, “defects and allowances” to cover these parameters. They should be specified as minimum, or maximum, or ranges of acceptance values; otherwise they may be use to classify a commodity, if necessary.

2. The definitions of “extraneous matters” and “foreign matters” in the entire proposed draft standard should be correlated. In addition, we would like to support to use the term “extraneous vegetable matters” instead of “extraneous matters” for better clarification.

SECTION 3.4: LOT ACCEPTANCE

We would like to propose that the acceptable quality limit (AQL) level for each sampling plan should be identified in this section in the same format as in the adopted codex standard of processed fruits and vegetables.

SECTION 7: WEIGHTS AND MEASURES

We would like to propose to add additional requirements on “defective of container” and “lot acceptance” to provide an allowance of weight of defective container. Format of codex standard of processed fruits and vegetables may be used as guidelines.

Specific Comments:

Thailand would like to provide suggestions on this document as follows:

1 We would like to propose to amend the italicizing in a scientific name of thyme from *Thymus spp.* to *Thymus spp.*

2 We would like to propose to amend the analysis method for moisture content determination from ISO 938:1980 to ISO 939:1980.