

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda Item 5

CX/PFV 14/27/7-Add.1

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES**

**27<sup>th</sup> Session**

**Philadelphia, Pennsylvania, United States of America,  
8 – 12 September 2014**

**Comments on the**

**Proposed draft Standard for Ginseng Products**

**(Conversion of the Regional Standard for Ginseng Products to a worldwide standard)**

**Comments at Step 3 submitted by:**

**Brazil, Costa Rica, Kenya and Thailand**

## Brazil

### Specific Comments

#### 2.1 PRODUCT DEFINITION (b)

##### Rationale

Considering that ginseng is not considered a source of both energy and nutrients, we would like to seek clarification on the adopted word “nutritional” on sentence (b) of product definition.

Therefore we would like to suggest the removal of the word nutritional from the sentence as below.

(b) packaged in such a manner as to safeguard the safety and ~~nutritional~~ and quality characteristics of the products;

#### 2.2.1.1 Dried Raw Ginseng

##### Rationale

The sentence “or other recognized drying methods” seems to be vague and not related to Codex Alimentarius documents, considering that it may be associated with acceptance or rejection of innovative methods. Thereof we would like to suggest an amendment to the section as highlighted below.

Considering the consecrated knowledge of the drying processes listed, we also would like to suggest the removal of the examples adopted

##### 2.2.1.1 Dried Raw Ginseng

Dried Raw Ginseng is manufactured when ginseng roots defined in Section 2.1(a) are dried in an appropriate manner ~~such as sun drying, hot air drying or other recognized drying methods~~. The product may be classified into one of such product types that have the main root and/or lateral roots or that are powdered or sliced.

2.2.1.2 Dried Steamed Ginseng
<p>Rationale</p> <p>For consistency with our previous comment and aiming simplification of the document, we would like to suggest amending the document as set below to a direct statement.</p> <p>Alternatively we seek clarification of the phrase “using the steaming method”, if any definition of a steaming method (i.e., whilst different from steaming) is needed.</p>
<p>2.2.1.2 Dried Steamed Ginseng</p> <p>Dried Steamed Ginseng is manufactured when ginseng roots defined in Section 2.1(a) are <del>prepared using the steaming method steamed previous to drying and the drying method stated in Section 2.2.1.1.</del> The product may be classified into one of such product types that have the main root and/or lateral roots or that are powdered or sliced.</p>

2.2.2.1 Raw Ginseng Extract and 2.2.2.2 Steamed Ginseng Extract
<p>Rationale</p> <p>We would like to seek clarification of the adopted list of examples considering that the definition of extraction encompasses polar solvents, which includes water and ethanol, but other polar solvents such as butanol, methanol, propanol, isopropanol etc. Furthermore, solvents such as propylene glycol, glycerin and aqueous solutions of both single and combined solvents are popular for the extraction of materials which are not rich in volatile components.</p> <p>In that sense, and also to allow innovation (e.g., CO<sub>2</sub> and microwave extraction, among others) we would like to suggest amending the section as set below.</p>
<p>2.2.2.1 Raw Ginseng Extract</p> <p>Raw Ginseng Extract is manufactured when soluble components of ginseng roots defined in Section 2.1(a) or Dried Raw Ginseng defined in Section 2.2.1.1 are extracted <del>by using water, ethanol or their mixture</del> filtered and concentrated. This product has a dark brown colour and a high viscosity. The product may be also presented as a powdered type through spray- or freeze-drying.</p> <p>2.2.2.2 Steamed Ginseng Extract</p> <p>Steamed Ginseng Extract is manufactured when soluble components of Dried Steamed Ginseng defined in Section 2.2.1.2 are extracted <del>by using water, ethanol or their mixture</del> filtered and concentrated. This product has a dark brown colour and a high viscosity. The product may be also presented as a powdered type through spray- or freeze-drying.</p>

4 FOOD ADDITIVES
<p>Rationale</p> <p>Brazil would like to drive the attention of the Committee to the discussions and output of the 25<sup>th</sup> Session of the CCPFV (Paras. 28-40 – REP11/PFV), considering the procedures as outlined in the section on Relations between commodity committees and general subject committees in the Procedural Manual.</p> <p>In that sense, we would like to suggest the adoption of the general reference to the GSFA and/or to request CCFA to limit/restrict the additives for use in ginseng in Tables 1 and 2, and to limit/restrict the allowable additives listed in Table 3 of the GSFA.</p>

#### 4 FOOD ADDITIVES

~~No additives are permitted in the products covered by this standard.~~

4.1 Food additives used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CODEX STAN 192-1995) in food category 04.2.2.2 "Ginseng Products - Dried" and 04.2.2.6 "Ginseng Products - Extracts" are acceptable for use in foods conforming to this Standard.

4.2 Use of flavouring substances should be consistent with the Guidelines for the Use of Flavourings (CAC/GL 66-2008).

4.3 Section 4.1 of the General Standard for Food Additives (CODEX STAN 192-1995), referring to the conditions applying to carry-over of food additives from ingredients and raw materials into foods, shall apply.

#### Costa Rica

Costa Rica is grateful for the opportunity to express its support for this document, has examined it, and has no comments, as we are not producers.

#### Kenya

Kenya would like to thank the eWG chaired by Public of Korea and co-chaired by Canada for the good work done, to come up with the document for Codex members to comment on.

#### SPECIFIC COMMENT

Kenya generally accepts the Ginseng Products proposed draft standard. However there is need for the initiator of the standard to give clarification on the issues that have been raised by other countries regarding clause 3.2.2.2 on chemical and physical characteristics of dried ginseng and ginseng extract (liquid and powdered form)

#### Thailand

Thailand would like to thank the electronic working group chaired by Republic of Korea and co-chaired by Canada for their efforts made in preparation of the proposed draft standard for Ginseng Products. Thailand would like to submit comments as follows:

#### General comments

Where applicable, Proposed Draft Standard for Ginseng Products should follow the updated provision and format that apply to standards for processed fruits and vegetables for consistency.

#### Specific comments

##### Section 1.1

Thailand would like to seek clarification on the deletion of the second sentence i.e. whether this standard apply to dried ginseng and ginseng extract that are intended for further processing.

##### Section 1.2

Thailand does not agree with the recommendations from EWG to deleted Section 1.2 due to the fact that ginseng is regulated as medicine and not regard as food in many countries. The Coordinating Committee for Asia agreed that difference in regulation of ginseng among different countries could be accommodated by introducing a text clarifying that standard should apply only when it is regulated as food. In Thailand dried raw ginseng and ginseng extract are regulated as medicine. Only ginseng less than 2 g. based on daily consumption are allowed to add in food products. In addition, given the lack of evidence about ginseng safety as food, ginseng is not recommended for children or for women who are pregnant or breastfeeding. So, the following text should be retained:

"1.2 This Standard applies only in those jurisdictions where products defined in 2.1 are regulated as food"

## 2. Description

Styles of the products need to be included in the standard for clarity e.g. whole, slices. This will also help facilitate the establishment of "Defects and Allowances".

### 3.2 QUALITY FACTORS

In order to be in line with the layout of standards for processed fruits and vegetables the standardized term "QUALITY CRITERIA" should be used instead of "QUALITY FACTORS" as follows:

#### ~~"3.2 QUALITY FACTORS~~ CRITERIA"

##### 3.2.1 Flavour, Colour, Taste and Ginsenoside Pattern

The provision on ginsenoside pattern should be deleted as it is considered as chemical characteristics and has already included in section 3.2.2. In addition the phrase "as well as be free from foreign matters" should be moved to section on "Allowances for defects" after section on "Definition of Defect".

So, the revised sentence would read as follows:

##### ~~"3.2.1 Flavour, Colour, and Taste and Ginsenoside Pattern~~

Ginseng products shall have normal flavour, colour, and taste ~~and a ginsenoside pattern~~ unique to specific species ginseng ~~as well as be free from foreign matters.~~

##### 3.2.2 Chemical and Physical Characteristics

Thailand would like to seek clarification on the meaning of words "to be identified" indicated in 3.2.2.1 (d), 3.2.2.1(d) and 3.2.2.2(d), whether a maximum limit for safe consumption as food will be included.

### 3.3 Definition of Defects

This section should be renumbered as follows:

#### ~~3.3~~ 3.2.2 Definition of Defects"

In addition, provision on (b) Mouldy ginseng is more relevant to section 6 Hygiene with regard to microbiological criteria and should be deleted as follows:

~~"(b) Mouldy ginseng- Ginseng that is visibly affected by mould~~

Also, new section 3.2.3 "Allowances for Defects" should be introduced as follows:

#### "3.2.3 Allowances for Defects

Ginseng product should be substantially free from defects such as foreign matters, insect-damaged ginseng....."

Other defects for different styles of ginseng should also be considered and included in this section accordingly

### **3.4 CLASSIFICATION OF "DEFECTIVES".**

The words "quality requirements" should be replaced with "quality criteria" and renumber sections to be consistent with the above. Proposed amendments as follows:

#### ~~-3.3~~ 3.4 CLASSIFICATION OF "DEFECTIVES

A container that fails to meet one or more of the applicable quality ~~requirements~~ criteria, set out in Section 3.2 ~~and 3.3~~, should be considered a "defective".

## 8.3 METHODS OF ANALYSIS

Thailand noted that all methods of analysis had been endorsed by the 29<sup>th</sup> Session of Codex Committee on Methods of Analysis and Sampling (CCMAS) as Type IV. Therefore, Thailand proposes to retain the type of methods of analysis as Type IV until any revision made to the methods of analysis has been endorsed by CCMAS:

So, the table would read as follows:

## "8.3 METHODS OF ANALYSIS"

PROVISION	METHOD	PRINCIPLE	TYPE
Moisture	AOAC 925.45 B* * Quantity of sample - Dried Ginseng: 2 g - Ginseng Extract: 1.5 g (mixing with 20 g of sea sand)	Gravimetry,	† <u>IV</u>
Solids	AOAC 925.45 B and calculated by subtracting the content of moisture from 100%	Calculation	† <u>IV</u>
Ash	AOAC 923.03	Gravimetry, <u>after ashing at 550<sup>o</sup>c</u>	† <u>IV</u>
Water-insoluble Solids	described in Annex A	Gravimetry	† <u>IV</u>
Water-saturated n-butanol extracts	described in Annex B	Gravimetry	† <u>IV</u>
Identification of ginsenosid Rb1, [Rg1] and Rf	described in Annex C	TLC or HPLC	† <u>IV</u>