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CODEX COMMITTEE ON SPICES AND CULINARY HERBS**

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**DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED FRUITS AND BERRIES:
PART B – REQUIREMENTS FOR VANILLA (CX/SCH 24/7/5)**

(Comments of the European Union, India, Indonesia, Kenya, Morocco, Nigeria, Thailand, Uganda, and the Republic of Tanzania)

The European Union

The European Union and its Member States (EUMS) would like to thank the United States of America and co-chair Members for updating the draft Standard for spices derived from dried fruits and berries: Part B - Requirements for Vanilla.

The EUMS would like to submit the following comments:

POINT	COMMENTS
General comment	The document will need editorial corrections. In many parts, spaces, punctuation marks are missing and there are inconsistencies in the notations (upper/lower case)
2.1. Product definition	Table 1 on point 2.1.1 lists the variety of vanilla covered in this draft standard. The EUMS question whether <i>Vanilla pompona</i> Schiede should be included in this Codex standard. <u>Reasoning:</u> Standard ISO 5565-1 refers to standard ISO 3493:2014. It is not applicable to <i>Vanilla pompona</i> Schiede (Antilles vanilla)". In addition, the European Spice Association (ESA) List of Culinary Herbs and Spices does not include <i>Vanilla pompona</i> Schiede. It only mentions <i>Vanilla planifolia</i> and <i>Vanilla tahitensis</i> .
2.2. Styles	<p>a) What is "split vanilla"?</p> <p>Mature vanilla beans may split naturally due to dehiscence. The bean should not be split through the entire length (no maximum length specified in the ISO 5565-1 standard). The split part should contain seeds.</p> <p>b) How does the splitting of vanilla affect moisture and vanillin content – at it exposes a greater surface of the vanilla bean to the atmosphere.</p> <p>ISO 5565-1 provides a qualitative classification of vanilla pods, including 4 categories. Each category contains style forms "non-split" and "split". The requirement on moisture content is provided as a maximum value for each category (both for "non-split" and "split"), which suggests that the splitting of the vanilla pods does not affect moisture content.</p> <p>Regarding the vanillin content, according to ISO standard ISO 5565-1 the vanillin content is mainly dependent on the conditions under which the pods are cultivated, harvested, and processed and on their length. The term "processed" may involve treatments that the vanilla may have undergone and that 'splitting' is not included in this term.</p> <p>Point 5 of ISO 5565-1 "General characteristics" for vanilla pods reads that "<i>they shall not have undergone any treatment which could induce a change in their natural vanillin content or in the content of any other constituent of the flavour</i>". Considering the definition of vanilla pods suggested in this draft standard (vanilla pods, consisting of whole pods which may be split) it can be concluded that splitting does not affect the vanillin content.</p>

<p>2.2 Styles</p>	<p>The following text is proposed:</p> <p>Vanilla may be:</p> <ul style="list-style-type: none"> - Whole Pods/beans/[split beans] - Cut/broken. - Seeds/Vanilla caviar. - Ground/powdered; processed into a powder. <p><u>- Vanilla in bulk, consisting of vanilla pods and cut vanilla.</u></p> <p>Other styles distinctly different for those four are allowed, provided they are labeled accordingly.</p> <p><u>Rationale:</u> It would be appropriate to consider alignment with the terms in both ISO 5565-1:1999 and ISO 3493:2014.</p> <ul style="list-style-type: none"> • Furthermore, the term “vanilla pod” is mentioned both in ISO standards and in point 9.2 (Sampling plan) of this draft Codex standard. Therefore, the term vanilla pod should also be considered under point 2.2. Thus, it is suggested that the term “vanilla pod” should be used in this draft standard. In addition, we note that the ESA List of Culinary Herbs and Spices mentions “vanilla pods” as a primary common name and “vanilla beans” as a secondary or alternative name. • The word “caviar” is defined in the Codex standard for sturgeon caviar (CXS 291-2010) as “<i>the product made from fish eggs of the Acipenseridae family by treating with food grade salt</i>”. This definition is in line with the interpretative communication of the European Commission 91/C 270. The association of “caviar” with another designation, such as “vanilla caviar” is neither precise, nor clear or easily understandable for the consumer and therefore it should be avoided. • Furthermore, we propose the inclusion of other forms (styles) of the product, such as vanilla in bulk, that are available on the market.
<p>3.2 Quality criteria</p>	<p>For consistency with the template for SCH standards, with the heading of that paragraph (point 3) of this draft standard and with other standards, it is proposed to use “Quality factors” instead of “Quality criteria”. In the “Template for SCH Standards”, the term “ESSENTIAL COMPOSITION AND QUALITY FACTORS” is used. In addition, the existing Codex standards (amended in 2022), e.g. standard for dried basil (CXS 345-2021) or standard for dried oregano (CXS 342-2021), this point is named “Quality factors”. Having regard to the above, in point 3.2 it should be consequently “quality factors” and not “quality criteria”.</p>
<p>4.1</p>	<p>This draft standard allows the use of anticaking agents in ground/powdered form of vanilla. This contradicts the provisions of the ISO standard 5565-1, that, for vanilla powder, reads as follows: “obtained by grinding vanilla pods after drying without additives”.</p> <p>To be also consistent with other standards, e.g., that of saffron, we suggest for this paragraph: <u>“No food additives are permitted in the products covered by this standard”</u>.</p> <p>This provision will impede unfair practices (food fraud/adulteration) such as increasing the weight of spice with various fillers.</p>
<p>8.3.2</p>	<p>Indicating the country of harvest should be mandatory. The producing country is an important information in terms of consumer’s purchasing choice. Vanilla is one of the most expensive spices in the world, information on the country of harvest should be easily accessible to consumers. Various product advertisements draw attention to different flavour and aromatic qualities depending on their place of harvest, so it may be crucial when choosing a product.</p> <p>In addition, taking into account the General standard for the labelling of prepackaged foods (CXS 1-1985), para 4.5.2:</p> <p><i>“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.”</i>, if there is no processing, the country of origin is, by definition, the country of harvest in the case of spices.</p> <p><u>In conclusion: to cover all circumstances, both the country of origin and the country of harvest should be mandatory.</u></p>

Annex 1. Table 1 Chemical characteristics

The preferred option is option 3 with the following proposed amendments:

Scientific name	Form/Style	Classes	Moisture content %w/w (max)	Minimal vanillin content in % of the raw material as traded
<i>Vanilla planifolia</i>	Whole Pods/beans/split beans	Extra	35-38	1.8
		I	32-38	1.6
		II	25-30	1.4
		III	18-25	1.2
	Cut/Broken	:	(18-38)	(1.2)
	Ground/powdered	:	(15-25)	(1.0)
	Seeds/caviar	:	(18-38)	(1.2)
<i>Vanilla tahitensis</i>	Whole Pods/beans/split beans	I	30-55	0.4
		II	15-45	0.3
	Cut/Broken	:	(15-55)	(0.3)
	Ground/powdered	:	(10-45)	(0.3)
	Seeds/caviar	:	(15-55)	(0.3)

Rationale:

- The table should be based on both scientific name and form/style in line with the approved revision of the ISO 5565-1 standard.
- *V. planifolia* and *V. tahitensis* represent the two main products currently traded globally. Their chemical specifications differ significantly. There are not enough data on the three remaining species proposed (*V. pompona*, *V. cribbiana*, *V. odorata*). If their characteristics are comparable, they could be grouped with one of the two former species.
- There is no information about total ash and acid insoluble ash, and this does not appear in ISO 5565-1 standard.
- It is suggested to include the quality classes with the values (see also in the table)

Extra. Pods which are whole or split, sound, supple and full of typical flavour, of uniform dark chocolate brown to reddish colour, and without any stain other than the mark.

- Pods which are whole or split, sound, supple and full of typical flavour, of uniform dark chocolate brown to reddish colour, and which may have a few stains, the total length of which does not exceed one-third of the length of the pod.
 - Pods which are whole or split, sound, more or less supple, of typical flavour, of reddish colour and which may have numerous stains, the total length of which does not exceed half the length of the pod, as well as a few red filaments which do not exceed one-third of the length of the pod.
 - Pods which are whole or split, sound, dry or wooded, of typical flavor, reddish in color and which may have several stains, the total length of which does not exceed half the length of the pod.
- ISO 5565-1 standard does not include any specifications on these other styles/forms (cut/broken, powdered, seeds). It requires that these products derived from beans meeting the requirements specified in the standard. For these other forms the data proposed by the EWG should be used.
 - The same terminology should be used throughout the standard. Point 2.2 mentions "Seeds/vanilla caviar" the exact same term should be used in Table 1. Given the comment above, only "seed" would be preferable (delete "caviar").
 - The values of vanillin content are presented on dry basis. To facilitate comparison, we suggest aligning with the provisions of the ISO standard ISO 5565-1, that refer to the methods describe in ISO-5565-2

and present them on wet basis. Other reason for aligning with ISO standards for this parameter is that the recommended methods for vanillin content presented in Annex II of this draft Codex standard refers to ISO 5565-2. This would ensure consistency throughout the whole document.

- It is suggested adding an upper limit in the vanilla content column, as mentioned in ISO 5565-1, and not just the lower limit to prevent adulteration with synthetic vanillin.

Annex 1. Table 2

This table should be consistent with other standards (for e.g. saffron). Either the missing parameters are added (with values zero), or a generic sentence stating that, **Insects (live & dead) and mammalian excreta & hair, visible to the naked eye should aim to be zero.**

If these parameters are considered, it would be necessary to add appropriate methods of analysis in Annex II.

A footnote should clarify what colour tolerance is, and what colour is accepted for vanilla. Also applicable for shriveled, immature, broken. For example, what part of the pods may or may not be shriveled, as well as when a pod is classified as broken.

India

2.2 Styles

India proposes to change the style 'Whole beans/ [split beans]' as "Whole beans which may be split". The current text seems to refer to two different types however; the proposed revision would clarify that whole beans also include split beans.

3.2.2. Classification

India proposes to remove this section from the draft as in Annex I, there is no grading /classification, hence the subclause 3.2.2. (Classification) is redundant.

Table 1 - Chemical characteristics for Vanilla

India while supporting for Option 1 for Table 1 (Chemical characteristics for vanilla) proposes maximum percentage of moisture content at 30% for Whole and Cut/broken vanilla and 20% for Ground/powdered vanilla. India proposes vanillin content on wet basis g/100g at 2% (min) for all styles, as reference method mentioned in Table 1 of Annex 2 i.e. ISO 5565-2 which is on wet basis. These proposals are based on India's surveillance & regulatory data.

Table 2 - Physical Characteristics for Vanilla

India does not agree to include size tolerance and colour tolerance since these have not been defined anywhere in the draft standards.

Indonesia

1. Section: Style.

In relation to style of Vanilla, Indonesia supports that split beans as part of whole beans as it is common that split beans might be mixed with whole beans during the trade/distribution. For that reason, square bracket [split beans] is proposed to be opened. For further clarity, Indonesia proposes to add an explanatory note on split beans as follow: split beans are vanilla that is split starting at the tip where the split can reach approximately 20% of the bean's length.

2. Section: Labelling.

In relation to section 8.3.2, Indonesia supports that country of harvest remains optional. This is due to the complexity in proving country of harvest in trade practices and preference for "optional" is also in line with CCFL's advice to CCSCH in another Draft Standard under CCSCH. It is also important to explain on how such deposition would be useful for fraud prevention.

3. Section: Table 1

Indonesia proposes to delete the parameter of total ash and acid insoluble ash, since it is not common to specify total ash and acid insoluble ash for vanilla, as below:

Name	Form / Style	Moisture content	Total ash	Acid Insoluble Ash on dry Basis % w/w (max)*	Vanilin Contains
Vanilla	Whole	12-38			≥ 1.2
	Cut/Broken	10-25			≥ 1
	Ground/ Powdered				≥ 1

Indonesia also supports option 2 and describes that the characteristic applies only for the Planifolia type.

4. Section: Table 2

Indonesia proposes to include a clear definition (add explanatory/footnote) for Color Tolerance and Size Tolerance as well as for shrivelled immature Broken in order to provide a mutual understanding among parties. Indonesia is also of the view that it is necessary to include method for measuring shrivelled immature.

Furthermore, Indonesia proposes the value of shrivelled immature broken max 10.; as it is common that cut/broken style has more shrivelled immature broken than whole beans.

Kenya

Comment on Split beans: Kenya proposes that an elaboration be made on the split beans (a bean with an open end along its natural seam with seeds intact)

Justification: For clarity

Comment on Table 1, Annex 1. Chemical characteristics for vanilla [Chemical Characteristics per style]- Kenya supports the adoption of option 1

Justification: Option 1 has all the parameters for determining the chemical characteristics of Vanilla.

Comment on Table 2, Annex 1. Physical Characteristics for Vanilla

1. Kenya seeks further clarification of the parameter: Shriveled Immature broken and size tolerance.
2. Kenya notes that footnote 1 on particle size has been referenced in the column of colour tolerance for ground/powdered vanilla.

Morocco

➤ **Scope:**

This standard applies to vanilla (cured vanilla beans) as defined in Section 2.1 below, and offered for direct human consumption, as an ingredient in food processing or for repackaging if required. This standard does not apply to these products when intended for industrial processing.

○ **National Position:**

Morocco proposes adding the following sentence to the scope: "This standard does not apply to exhausted vanilla pods."

○ **Rationale**

Excluding exhausted vanilla from the scope of the standard helps to prevent potential confusion and ensures a clearer application of the standard. Furthermore, exhausted vanilla exhibit distinct characteristics compared to standard vanilla products.

➤ **8.3 Country of Origin and country of harvest.**

8.3.2 Country of harvest (optional) [mandatory]

○ **National Position:**

Morocco suggests that the country of harvest should be mandatory when the country of origin differs from the country of harvest.

➤ Champ d'application

« La présente norme s'applique à la vanille (gousses de vanille séchées) telle que définie à la section 2.1 ci-dessous, et proposée pour la consommation humaine directe, en tant qu'ingrédient dans la transformation des aliments ou pour le reconditionnement si nécessaire. Cette norme ne s'applique pas à ces produits lorsqu'ils sont destinés à un traitement industriel ».

Position nationale :

Le Maroc propose d'ajouter au champ d'application la phrase suivante : **Cette norme ne s'applique pas aux produits de la Gousses de vanille épuisés.**

Argumentaire :

Exclure explicitement les gousses de vanille épuisées du champ d'application de la norme permettent d'éviter toute confusion potentielle et assure une application plus claire de celle-ci. De plus, les gousses de vanille épuisées présentent des caractéristiques distinctes par rapport à la vanille standard.

➤ 8.3 Pays d'origine et pays de récolte.

8.3.2 Pays de récolte (facultatif) [obligatoire]

Position nationale :

Le Maroc suggère que le pays de récolte soit obligatoirement indiqué dans le cas où le pays d'origine diffère du pays de récolte.

Thailand

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

1. Section 3.2.1 Odour, flavour and colour – we would like to propose to add more factors that are related to this provision as follows;

“The product shall have a characteristic odour, flavour and colour, which can be varied depending on geo-climatic factors/conditions, **species and curing processes** and shall be free from any foreign odour, flavour and colour especially from rancidity and mustiness. Vanilla beans colour ranges from reddish to shiny black (oily black).”

2. Section 8.3.2 Country of harvest - Thailand support the labelling provision on the country of harvest as an optional. Because this provision should be specified as minimum requirements as in the standard template and other existing standards.

3. For the table 2 on Physical characteristics;

3.1 We would like to propose to remove the parameters of shriveled, immature and broken, color and size tolerance from table 1. This is because there are no clear analysis methods for these parameters and it could be accepted by making an agreement between trading partners.

3.2 We support specifying N/A for extraneous matter for ground and seeds style of vanilla until reference information is available.

Nigeria

Nigeria appreciates the work of the electronic working group chaired by the United States of America and co-chaired by Madagascar, Mexico and India

1. Scope

Nigeria propose a revision of the scope of the standard as follows:

This standard applies to vanilla (cured vanilla beans/**Pods**) as defined in Section 2.1 below, and offered for direct human consumption, as an ingredient in food processing or for repackaging if required. **This standard does not apply to these products when intended for industrial processing. “This standard does not apply to products from exhausted vanilla”.**

2.2. Styles

Nigeria supports proposal that "split beans" should be considered as a distinct category separate from "whole beans" style in classifying vanilla beans.

The section will now read as follows:

- Whole Beans
- Split Beans
- Cut / broken
- Seeds / Vanilla Caviar
- Ground/Powdered: processed into powder

Rationale

Split beans, owing to their unique physical state, present a profile that is notably different from whole beans. This distinction arises largely because the splitting process alters the beans' exposure to air, potentially modifying their flavor and aroma in significant ways. Such a considerable difference in characteristics justifies treating split beans as a distinct category.

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8.3.2 Country of harvest

Nigeria proposes the deletion of "Optional" from the provision for Labelling relating Country of Harvest and retention of mandatory.

Rationale

The origin of the product may be different from the Country of Harvest and it is therefore important for traceability.

8.3.3 Region of harvest and year of harvest.

Nigeria proposes the deletion of "Region of harvest" from the Labelling provision.

Rationale

The country origin if declared as required in 8.3.2 is sufficient to reflect the region. While declaration of year of harvest reflects the quality and freshness of the products.

Table 1: Chemical characteristics for vanilla

Nigeria supports proposal for the merger of Option 1 and Option 3

Rationale

Merger of the two options will provide the most useful information to users of the standard.

Uganda

Uganda appreciates the work done by the chairperson and vice chairperson of the EWG for the work done in developing the standard.

Uganda deliberated on the draft standard for vanilla and generated the following comments:

1. Under clause 2.2, Uganda recommends that the style on "split beans" is deleted from the standard till consensus is reached on what form of split beans to consider.

Justification

Uganda noted that discussion on whether to consider split beans longitudinally or consider split ends did not reach consensus, thus Uganda's recommendation to delete the style and maintain "whole beans".

2. Uganda recommends that the country of origin is made mandatory.

Justification

It should be noted that different countries have varying geo-climatic factors and conditions which affect the unique flavours of the vanilla from the said countries.

Therefore, by having the "country of origin" mandatory, the consumers are able to make informed choices in the market on which type of vanilla they want basing from the uniqueness from the various vanilla producing countries.

3. Under table 1, Uganda recommends that the moisture content is considered as a maximum thus the need to open the square brackets.

In addition, Uganda recommends that the moisture content is considered as “35”

Justification

- a) By having the maximum for the moisture content, it is an indicator of safety and quality. In addition, by having a maximum value, it therefore it ensures that the producers make the effort of making sure the moisture is within the limit and not sell products that have a high moisture content.
 - b) Having a high moisture content also creates a breeding ground for microbial growth, thus the need to limit the creation of conducive conditions for such microbes to grow.
4. Under table 2, Uganda recommends that the square brackets are opened up for the parameter on “extraneous matter” and leaving it at “NVA”.

Justification

The rationale is that there is still need for more data to support the indication of independent values.

The United Republic of Tanzania

COMMENT

2.1.1, Table 1: The URT proposed deletion of other species *Vanilla pompona*, *Vanilla odorata* C. Presl and *Vanilla cribbiana* Soto Atenas.

JUSTIFICATION

Proposed retaining two species namely *Vanilla planifolia* Andrews and *Vanilla tahitensis* J.W. Moore which are the most traded vanilla species used in food industries.

COMMENT

2.2 The URT propose inclusion of split beans among the styles.

JUSTIFICATION

It is among the style of presentation, produced and traded in different market globally as an effect of maturity/harvesting/ processing technique. The product is traded in that form.

COMMENT

8.3.2 The URT propose to declare country of harvest as optional until when technological innovation is available to ascertain the marking requirement provided.

JUSTIFICATION

The country of harvest is the real origin of the products for traceability purposes provided that drying and dehydration do not change the nature of vanilla. Thus method to ascertain the country of harvest should be initiated for fraud prevention.

ANNEX 1, TABLE 1

COMMENTS AND JUSTIFICATION

Option 1. The URT proposed the Moisture content of whole vanilla to be < 38% since the provided limits are too restrictive.it further proposed that the moisture content of powdered and Vanilla caviar to be < 15% since the provided limits are too high.

Option 2. [Chemical Characteristics] without Total ash and Acid Insoluble Ash: The URT supports the proposal for not including these limits based on the nature and use of the product.

Option 3. [Chemical Characteristics per specie per style] without Total Ash and Acid Insoluble Ash. The URT proposed deletion of the table since it confuses the application between option 2 and 3. Also chemical requirements are not related to species.

Option 4. [Chemical characteristics for vanilla per specie]. The URT proposed deletion of the table since it confuses the application between option 2, 3 and 4.

COMMENT

The URT proposed introducing a New product among the list namely "exhausted powder" together with its definition for clarity to read "powder obtained after grinding the post extraction vanilla pods. Also proposed the vanillin content of the exhausted powder to be <0.5%.

JUSTIFICATION

The product exist in the market hence necessitated the inclusion of that kind product and its requirements as proposed.

COMMENT

As for Table 1 Methods of Analysis for vanilla. The URT supports the proposed test for colour as per ISO 11037:2011 (Sensory analysis Guidelines for sensory assessment of the colour of product).

JUSTIFICATION

This standard was last reviewed and confirmed in 2023. Therefore this version remains current.