

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 4

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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 CUMIN

Comments at Step 6

(Comments of European Union, Ghana, India, Kenya, Malaysia, Mali, 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

3.2.4 Physical requirements – Table 1: Foreign matter should not be present in the products for direct consumption. However, in the absence of a definition of "practically absent" it would be appropriate to indicate a numerical value. It is therefore proposed a value of **0.1%**.

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 cumin 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 cumin 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 3.4 - Lot Acceptance

Our comments: The term "**excessively**" is **subjective** and may be interpreted differently by different stakeholders.

II. Para 9 Methods of Analysis and Sampling

Our comments: The method for determination of moisture should be referenced to ISO 939:1980 instead of ISO 938:1980.

KENYA

1 SCOPE:

We would like to support the comments of the United State of America as quoted below because normally the husk is separated from cumin then husk is discarded while Cumin is ground.

“This Standard applies to dried seeds of any cultivated varieties (cultivars) of *Cuminum cyminum* L. of the *Apiaceae* family offered as a condiment and for direct human consumption, commercial food processing or for repackaging if required. It excludes cumin intended for industrial processing.”

MALAYSIA

1. Section 1 SCOPE

a) Terms “fruits” or “seed”

Malaysia notes that the term “fruits” has been used to describe part of cumin covered in Section 1 (Scope) of Draft Standard for Cumin. However, Malaysia is of the view that the term “seed” is more suitable to describe part of cumin usually used for culinary purposes. This is to be in-line with the grouping / classification of spices and culinary herbs currently being developed under CCSC (Refer to Agenda Item 9 - Further work on grouping of spices and culinary herbs).

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

Malaysia also notes that two terms have been used in Section 1 (Scope) which are “industrial food production” and “further processing”. Malaysia is of the view that both terms should be clearly defined for better clarity and understanding.

Malaysia also supports recommendation from United States of America (USA) to revise the Scope as follows:

*“This Standard applies to dried seeds of any cultivated varieties (cultivars) of *Cuminum cyminum* L. of the *Apiaceae* family offered as a condiment and for direct human consumption, commercial food processing or for repackaging if required. It excludes cumin intended for industrial processing.”*

Malaysia is of the opinion that USA proposal’s is clearer and easy to understand provided the term “industrial processing” is clearly defined.

If our proposal is accepted, Malaysia further proposes that the same approach be used in the scope of three other draft standards for (i) Black/ White and Green (BWG) Pepper, (ii) Dried Thyme and (iii) Oregano; to ensure consistency.

2 Section 3.2.4 PHYSICAL CHARACTERISTICS / TABLE 1

Foreign matter content, max. % mass fraction

Malaysia is of the view that the term “practically absent” used for percentage of maximum mass fraction for foreign matter content in cumin (Class I) is subjective, cannot be measured and would have different interpretations.

Thus, Malaysia proposes an exact value to be determined for this physical parameter to avoid misinterpretation.

MALI

- Dans le champ d’application de la présente norme il serait bon de préciser le terme **‘transformation ultérieure’** ;
- Ajouter les graines à la présente norme car elles font l’objet de consommation ;
- Au paragraphe 87 biffer la mention ~~Sauf celles qui sont fondées sur des moyennes de l’échantillon~~
- Au paragraphe 22 biffer le mot ~~pratiquement~~ dans la phrase le cumin doit être exempt

Le Mali félicite et soutient le groupe de travail présidé par l'Union Européenne et l'Inde pour la préparation de l'Avant-projet.

NIGERIA

Nigeria supports the development of the Standard for Cumin because the standard will provide the quality characteristics and grading necessary to facilitate trade, and wishes to submit the comments below:

1. Scope

Nigeria wishes to propose the amendment of the scope as follows:

- i. The change of 'dried fruits' to '**dried Seeds**' as this is the form in which Cumin is traded and the requirements for the parameters specified in the Standard are based on the Seeds, not Fruits.
- ii. 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.

Table 1. Physical requirements for whole cumin

- i. Nigeria proposes a value of 0.5 to replace "practically absent" in Foreign matter content as 'practically absent' is subjective.
- ii. Nigeria agrees that the method of analysis for moisture should be ISO 939 and not 938; editorial.

THAILAND

General comment on Agenda item 4,5,6 and 7:

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 on agenda item 4: Draft Standard for Cumin

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

1. We would like to propose to amend the Product Definition in Section 2.1 by adding the phrase “before the final packaging and storage” at the end of the paragraph. This addition will clarify the definition of the product starting from raw material to the product in a container ready for sale. Please refer to the proposed draft standard for BWG peppers as an example.
2. We would like to propose the working group to consider using numerical values instead of using the term “practically absent” in Table 1 because visual examination of foreign matter in terms of practically absent is difficult to justify in practical.
3. We would like to propose to amend the analysis method for moisture content determination from ISO 938:1980 to ISO 939:1980.