



Food and Agriculture  
Organization of the  
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Organization

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Agenda Item 6.1

CX/SCH 19/4/7 Add.1

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

**Fourth Session**

**Thiruvananthapuram, India, 21 - 25 January 2019**

**PROPOSED DRAFT STANDARD FOR DRIED BASIL  
Comments at Step 3 (Replies to CL 2018/58/OCS -CCSCH)**

*Comments of Colombia, European Union, Iran, Japan, Mexico, United States of America, FoodDrink Europe,  
IOSTA and USP*

**Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2018/58/OCS-SCH issued in September 2018. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

**Explanatory notes on the appendix**

2. The comments submitted through the OCS are hereby attached as **Appendix** and are presented in table format.

## APPENDIX

## Proposed Draft Standard for dried Basil,- Comments at Step 3(Replies to "CL 2018/58/OCS-CCSCH)

COMMENTS	MEMBER / OBSERVER AND RATIONALE	
General Comment	<p><b>USP</b></p> <p>Thank you for offering the opportunity to review and comment on this proposed draft standard. As an organization that is interested and involved in the creation of standards for food ingredients and food products (via the Food Chemicals Codex compendium) and herbal products (via the USP-NF compendium), we have concerns over the lack of specific compositional information or requirements for this product and for similar spices, herbs, and botanical ingredients. The only chemical property provided in part A that might be seen as characteristic for basil is the requirement for volatile oils; however, the lack of specificity of this method/requirement and the lack of specific requirements on characteristic marker compounds present in basil are concerning. This standard, as drafted, would not prevent replacement or adulteration of the product with other plant materials that may be more readily available or less expensive. We believe this standard would greatly benefit from the addition of more definitive chemical compositional analysis to assist regulatory bodies in protecting trade. We suggest that the Committee consider incorporating requirements for specific components of the volatile oils fraction that could be considered characteristic of basil. Thank you.</p>	
General Comment	<p><b>IOSTA</b></p> <p>If steam treated, color may be dark green with moderate amount of brown leaf</p>	
General Comment)	<p><b>IOSTA</b></p> <p>If steam treated, color may be dark green with moderate amount of brown leaf</p>	
<b>1 SCOPE</b>		
<p>This Standard applies to basil leaves or flowers in their dried form as culinary herbs defined in Section 2.1 below, offered for <del>direct</del> direct <b>human</b> consumption or as an ingredient in industrial food processing, <del>or for repackaging if required</del>. Those products are excluded for intended industrial processing <b>other than what is indicated</b>.</p>	<p><b>Colombia</b></p> <p>The change seeks to clarify and delimit the scope of application, because by only indicating that it is for "human consumption", it could be understood that the food may or may not be packed or packaged. Thus, it is considered that the expression "or for repackaging, if necessary", does not establish a specific criterion to determine the specific situation in which the product is located.</p> <p>Likewise, it is considered pertinent to adjust the wording of the last paragraph in order to give greater clarity to determine the specific situation in which the rule is not applicable.</p>	
<b>TABLE 1 DRIED CULINARY LEAVES COVERED BY THIS STANDARD</b>		
<p>Sacred basil</p>	<p><i>Ocimum tenuiflorum</i> L.</p> <p><i>Pimpinellaanisoides</i> V. Brig</p>	<p><b>USA</b></p>
<p><u>Field basil</u></p>	<p><i>Salvia occidentalis</i> Sw</p>	
<b>2.2 STYLES/FORMS</b>		

<del>Whole, Whole/Intact</del>	<b>Mexico</b> To maintain agreement with the standards issued by the committee.
<del>}]Pieces[</del>	<b>USA</b>
<del>[Aplastada/frotada]</del> Crushed/rubbed	<b>Colombia</b> It is considered pertinent to eliminate the terms "Aplastada" and "Frotada" to replace them with "Picada" and "Triturada" (Crushed and Rubbed), in order to give greater clarity to the proposed text.
<b>3.2.1 INFESTATION</b>	
Dried Basil shall be free from live insects and practically free from dead insects, insect fragments and rodent contamination visible to the naked eye, <del>]corrected, if necessary, for abnormal vision</del> <u>[ or with such magnification as may be necessary in any particular case.</u>	<b>USA</b> Practically free needs to be defined
<del>Dried Basil shall be free from live insects and practically free from dead insects, insect fragments and rodent contamination visible to the naked eye, ]Dried basil shall of the applicable with physical properties requirements, as set out in annex II</del> <del>corrected, if necessary, for abnormal vision</del>	<b>Mexico</b> "Practically free from dead insects" is subjective. The part of infestation is already included in the table "Physical properties for dried basil"
<b>3.2.3 ODOR, FLAVOR AND COLOR</b>	
Dried basil has a typical odor which is fresh and reminiscent of aniseed with different notes depending on the chemical type. Its flavor has a bitter after taste. It shall be free from any foreign odour, flavour or mustiness.	<b>European Union</b> Section 3.2.3 Odor, flavor and color: According to this section the dried leaves of basil shall be greyish green in color. However, the colour depends on the treatment of the leaves. For example, the color of steam treated leaves is dark green with a moderate amount of brown leaves. We therefore suggest reconsidering the colour requirements based on the type of treatment of the leaves.
Dried basil has a typical odor which is fresh and reminiscent of aniseed with different notes depending on the chemical type. Its flavor has a bitter after taste. It shall be free from any foreign odour, flavour or mustiness.	<b>FoodDrinkEurope</b> 1- In 3.2.3 Odor, Flavor and Color; the dried leaves of basil shall be "greyish green": this depends on treatment i.e. for steam treated, it is "Dark green, moderate amount of brown leaf" 2- As per ANNEX II, under "other defects", color defects limit is 5 3- In section 9, Methods of analysis and sampling; no test method for color measurement FoodDrinkEurope, with this in mind, therefore suggests to: i. Reconsider the color requirements based on treatment type

	<p>ii. Clearly indicate the test method</p> <p>iii. Consider the use of Chroma Meters Measuring Head for color measurement</p>
<b>3.4 LOT ACCEPTANCE</b>	
<p>For the factors evaluated in a sample average, a lot is considered acceptable if the average complies with the specified tolerance and no individual sample <del>is excessively</del> is found outside the <u>tolerance mean +/- a standard deviation</u>.</p>	<p><b>Colombia</b></p> <p>It is considered that for the acceptance of factors evaluated in average sample, the expression "excessively out of tolerance" is subjective and does not give clarity for the acceptance of lots. In view of this situation, Colombia recommends that a standard deviation outside the tolerance be allowed to accept the lot; or otherwise the term "excessively out of tolerance" be defined.</p>
<b>4 FOOD ADDITIVES</b>	
<p><del>To facilitate the retention of powdered state of the product, anticaking agents that are listed in Table 3 of the Codex General Standard for Food Additives (CXS 195-1995) may be used.</del> The additives allowed in the products covered by this standard are those indicated for this category of foods in the General Standard for Food Additives (CODEX STAN 192-1995).</p>	<p><b>Colombia</b></p> <p>Colombia considers that according to the procedures established by the Codex Alimentarius Commission, the use of additives must comply with the provisions of CODEX STAN 192-1995, in order not to create inconsistencies between the standards.</p> <p>In the General Standard for Food Additives (CODEX STAN 192-1995), additives are allowed such as: acesulfame potassium (flavor enhancer), butylhydroxytoluene (antioxidant), polysorbates (stabilizers), among others, which are authorized for the category "12.2.1 Aromatic herbs and spices".</p>
<b>5. CONTAMINANTS</b>	
<p><b>5 CONTAMINANTS</b></p> <p>The control of contamination by mycotoxins should be <u>considered</u>.</p>	<p><b>Colombia</b></p> <p>The control of contamination by mycotoxins should be considered. There are international (European) regulations where the preparation of the samples and the methods of analysis for the official control of the content of mycotoxins in food products, including spices, will meet the following criteria: Weight of the sample, method of sampling according to the weight of the lot and acceptance criteria of the lot.</p>
<b>8. LABELLING</b>	
<p><b>8 LABELLING</b></p>	<p><b>Colombia</b></p> <p>There are international regulations in which the safety and quality of packages and packaging for this class of products is required, which must be harmonized for free trade.</p>
<b>9. METHODS OF ANALYSIS AND SAMPLING</b>	
<p><b>9.1 Methods of Analysis</b></p>	<p><b>European Union</b></p> <p>Section 9.1 Methods of Analysis:</p>

	A test method for color measurement is missing despite the setting of a color defect limit of 5 in ANNEX II. A method for color measurement should be considered.				
Extraneous Matter	<b>Iran</b> For Item Extraneous Matter and Foreign matter , ISO 3632-2 as a reference method should be removed. (It is a reference No for saffron NOT BASIL) !				
Foreign Matter ISO 927, ISO 3632-2	<p><b>FoodDrinkEurope</b> Definition of foreign matter: 1- As per ISO 927 which is the reference in this standard: “all matter visible to the naked eye or with a maximum 10 times magnifying power that is not part of the plant to which the spice or herb belongs” EXAMPLE: The origin of macro foreign matter can be non-animal (e.g. stems, stones, straw, visible moulds) or animal (e.g. excreta, insects, and insect-defiled product) foreign matter. Ref: <a href="https://www.iso.org/obp/ui/#iso:std:iso:927:ed-3:v1:en">https://www.iso.org/obp/ui/#iso:std:iso:927:ed-3:v1:en</a></p> <p>2- For comparison, the ASTA definition is: Extraneous matter is defined as everything foreign to the product itself and includes, but is not limited to: stones, dirt, wire, string, stems, sticks, nontoxic foreign seeds, excreta, manure and animal contamination.</p> <p>3- For comparison, the FDA’s defect levels handbook definition is: Extraneous materials is defined as “Any foreign matter in a product associated with objectionable conditions or practices in production, storage, or distribution.” This includes “objectionable matter contributed by insects, rodents, and birds; decomposed material; and miscellaneous matter such as sand, soil, glass, rust, or other foreign substances” (FDA 2009 Defect Levels Handbook). FoodDrinkEurope understands that the phrase “can be” in the example under ISO 927 is limiting the foreign matters to the list; (e.g. stems, stones, straw, visible moulds). This contrasts with the ASTA &amp; FDA 2009 Defect Levels Handbook, where it is not limiting types of foreign matter to examples mentioned. FoodDrinkEurope therefore suggests to reconsider the foreign matter definition to ensure it clearly covers a broader range as defined by ASTA and the FDA</p>				
<b>Chemical Properties for Dried Basil</b>					
Form	Moisture content	Ash	Ash Insoluble	Volatile Oils	<b>USA</b>
Pieces	42	16	2.5	0.3	
Ground/ powdered					
Moisture content (Max %) <del>12</del> 10					<b>USA</b>

<b>Physical Properties for Dried Basil</b>	
<b>Physical Properties for Dried Basil</b>	<p><b>Japan</b> Basil belongs to the same family with thyme, and both dried basil and thyme are produced similarly. Therefore, the physical requirements for dried basil should be, regardless of its grades, the same as thyme for consistency as follows.</p> <p>1) 'Extraneous matter' and 'Foreign matter' requirements should be 0.5%.</p> <p>2) Units of 'Insect fragments' and 'Dead whole insects' are ambiguous. If the abbreviated unit 'gm' denotes the mass unit 'gram', then it should be expressed as 'g' based on SI derived unit. In addition, the proposed limit for 'Dead whole insects' should be 1.0% for maintaining hygiene conditions.</p> <p>3) 'Color defects' which appear in 'Other defects' should be defined clearly along with units.</p>
<p><del>Insect fragments maximum/ 10 gm</del> <del>Dead insects, insect fragments, rodent contamination</del> <del>max % mass fraction</del></p>	<p><b>Mexico</b> It is not considered necessary to differentiate between the parameters: Insect fragments maximum / 10 gm Dead whole insects count / 100 gm max In addition, to standardize the description with other standards already issued by the Committee (eg Standard for cumin and thyme)</p>
<del>Rodent filth maximum number of hairs /10 gm</del>	<b>Mexico</b>
<del>Dead whole insects count/100 gm max</del>	<b>Mexico</b>
<p><b>Other excreta mg/Kg max</b> ----- <b>4.4</b></p>	<p><b>USA</b> 4.4 applies to Basil Whole, Crushed/Rubbed and Ground/Powdered</p>
<b>Basil Whole</b>	
Moisture content <del>3.0</del> <del>1.0</del> <del>0.5</del> <b>2</b>	<p><b>Mexico</b> According to the ESA (European Spice Association).Reference value: Impurities(The definition of foreign matter corresponds to that of ESA impurities)</p>
Mammalian Excreta <del>1.0</del> <b>2.2</b>	<b>USA</b>
<b>Basil Pieces</b>	
<b>Pieces</b>	<b>USA</b>
Extraneous matter <del>3.0</del> <del>1.0</del> <del>0.5</del>	<b>USA</b>

Extraneous matter <del>3.0</del> <del>1.0</del> <del>0.5</del> <u>2</u>	<b>Mexico</b> According to the ESA (European Spice Association). Reference value: Impurities (The definition of foreign matter corresponds to that of ESA impurities)
Foreign matter 4.0	<b>USA</b>
Insect fragments, 4.0	
Mold damage 4.0	
Dead whole insects count <del>1.0</del> <del>2.0</del>	
Mammalian excreta 4.0	
Insect damaged leaves, 4.0	<b>USA</b>
Other defects 5	
<b>Crushed or ribbed</b>	
Extraneous matter <del>3.0</del> <del>1.0</del> <del>0.5</del> <u>2</u>	<b>Mexico</b> According to the ESA (European Spice Association). Reference value: Impurities (The definition of foreign matter corresponds to that of ESA impurities)
Mammalian excreta 4.0 <u>2.2</u>	<b>USA</b>
<b>Ground/powdered</b>	
Extraneous matter <del>3.0</del> <del>1.0</del> <u>2</u>	<b>Mexico</b> According to the ESA (European Spice Association). Reference value: Impurities (The definition of foreign matter corresponds to that of ESA impurities)
Mammalian excreta 4.0 <u>2.2</u>	<b>USA</b>