

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
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Organization

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Agenda Items 3.1, 4.1, 5.1, 5.2, 6.1, 7.1 and 8.1

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

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Comments from European Union

Draft Standard for Oregano

Agenda Item 3, CX/SCH 21/5/3

Mixed competence

Member States vote

The European Union and its Member States (EUMS) would like to thank Turkey for leading the electronic working group on oregano.

The EUMS would like make the following comments.

Section 2.1 – Product definition

As Table 1 plays a crucial role in the standard for oregano, the EUMS are in favor of simplifying Table 1 and keeping the indications of “generic name” and “scientific name”, and deleting the “trade name”.

General name	Scientific name
Oregano-Origanum	<i>Origanum</i> L. spp., except <i>Origanum majorana</i> L.
Oregano-Lippia	<i>Lippia</i> L. spp.

The reason we propose this deletion is that using oregano trade names which are derived from the geographical regions may confuse consumers and the market as to the country of origin and/or country of harvest. For instance, the Cretan oregano (*Origanum onites* L.) is grown/cultivated not only in the Cretan island of Greece but also in Aegean islands and in other parts of the mainland of Greece, as well as in other North-East Mediterranean countries, like Turkey. So if the trade name of ‘Cretan oregano’ were to be labelled on the product, when in fact the country of harvest is Turkey, the trade name may create a great deal of confusion for consumers.

Moreover, since in our understanding the inclusion of the different varieties/species of oregano in the standard is based on the chemotype of essential oils contained in it, the EUMS propose to delete Sword oregano (*Satureja* spp. L.) from table 1, since:

- all species of the genus *Satureja* fall under “Savory” according to the European Pharmacopoeia, the European Spice Association, the American Spice Association, the [Mansfeld's database](#) and the [GRIN-Global by the U.S. National Plant Germplasm System](#);
- a separate ISO standard exists for *Satureja*, which means that this is a totally different plant;
- the carvacrol content in *Satureja* is often below 50% of the total essential oil, and it does not smell and taste as oregano.

Therefore, *Satureja montana* and *Satureja hortensis* should not be included in the oregano standard and a different Codex standard is developed for them as “Savory”.

In addition, a typo error in the Table 1 of CX/SCH 21/5/3 should be corrected. The letter L. (Linnaeus) should follow the scientific name *Origanum* and not appear after the abbreviation spp. (meaning different species). So, in Table 1 of CX/SCH 21/5/3 it should be stated *Origanum* L. spp' instead of '*Origanum* spp. L.'

Section 8.2.2

The EUMS consider that the scientific name and style of the product should be mandatory only when the product is offered for direct consumption, and not when it is used as an ingredient in a compound food, for the following reasons:

- 1) the size of labels is limited. This fact is even more challenging as most of the labels are multilingual, making the space available for information to be reduced to a minimum;
- 2) consumers' information. Consumers do not buy a particular food for its oregano content (like in potato chips with oregano). In such a case, the scientific name of oregano is not the main driver for the consumer's food choice. However, if oregano is sold directly as a herb, then the consumer may want to find the oregano species and quality standards on the label.

Therefore, the EUMS propose a new wording for section 8.2.2. as follows:

Section 8.2.2:

'The general name, scientific name and style of the product shall be noted when the product is offered for direct consumption. In all other cases, the general name is sufficient. Classification may be indicated as described in Table 1 and Sections 2.1 and 3.2.3. In case of products consisting of blends of different Oregano species, the name of the product may be followed by the Oregano species in order of descending quantity.'

Section 8.3 Country of origin

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production

Draft Standard for dried roots, rhizomes and bulbs—dried or dehydrated ginger

Agenda Item 4, CX/SCH 21/5/4

Mixed competence

Member States vote

The European Union and its Member States (EUMS) would like to thank Nigeria for leading the electronic working group on ginger.

The EUMS would like to provide the following comments:

Section 4:

The EUMS take note that CCSC4 requested the Codex Committee on Food Additives (CCFA) to clarify how processing aids could be addressed under the Section 4 "Food additives" in accordance with relevant provisions in the Codex Procedural Manual (REP19/SCH, para. 39ii).

The EUMS observe that CCFA51, while considering the above request, noted that two substances (i.e. calcium oxide and sulphur dioxide) included in Chemical Requirements Section of the draft standard are associated with the functional class of bleaching agents and could potentially be considered as food additives rather than processing aids. Consequently, CCFA51 requested CCSC to clarify this matter (REP19/FA, paras. 28-30).

Taking into account that "bleaching agents" is a recognised functional class within the Codex Alimentarius, the EUMS are of the view that INS 529 calcium oxide and INS 220-539 sulfites, if used for bleaching, are used as food additives and the draft standard should be amended accordingly.

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly "inspection mark" means.

Table 2

Since sulphites can be naturally occurring, the EUMS propose to delete the sentence '*Sulphur dioxide shall not be detected*' in **Table 2 (Notes)** and allow '*Sulphite SO₂ < 150 ppm*' instead. Depending on the method of analysis, even natural substances containing Sulphur may be titrated as SO₂. Therefore, a positive SO₂ result

does not necessarily mean that the additive has been actively used.

Draft Standard for dried cloves

Agenda Item 5.1, CX/SCH 21/5/5

Mixed competence

Member States vote

The European Union and its Member States (EUMS) would like to thank Nigeria for leading the electronic working group on dried cloves.

The EUMS would like to provide the following comments:

Section 3.2.3 Classification (optional)

This section should be deleted as Annex I and II do not provide any information regarding classification into different grades.

Section 8.3 Country of origin

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly “inspection mark” means.

Draft Standard for saffron

Agenda Item 5.2, CX/SCH 21/5/6

Mixed competence

Member States vote

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

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly “inspection mark” means.

Table 1, Annex I and Table 2, Annex II

The EUMS suggest using terms “Class/Grade instead of a “category” in Tables 1 and 2 too be consistent with section 3.2.3.

The EUMS further suggest the following values for extraneous matter and foreign matter in Table 2 in order be consistent with the corresponding ISO standard (3632-1):

Class/grade	Extraneous Matter % w/w (max)	Foreign Matter % w/w (max)
I	0.5	0.1
II	3.0	0.5
III	5.0	1.0

Draft Standard for dried basil

Agenda Item 6, CX/SCH 21/5/7

Mixed competence**Member States vote**

The European Union and its Member States (EUMS) would like to thank Egypt for leading the electronic working group on dried basil.

The EUMS would like to provide the following comments:

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly “inspection mark” means.

ANNEX II

The EUMS propose to delete the 'colour defects' column in Table B of Annex II, because colour is not the right parameter for a global standard. This was already agreed in eWG, since basil colour depends on the type of post-harvest treatment that is used. The eWG also agreed to include instead a sentence clarifying this point. The sentence has been included at the end of point 3.2.1, but the colour defects are still in the Table B in Annex II.

Proposed Draft Standard for dried or dehydrated chilli and paprika**Agenda Item 7, CX/SCH 21/5/8****Mixed competence****Member States vote**

The European Union and its Member States (EUMS) would like to thank India for leading the electronic working group on dried or dehydrated chilli and paprika.

The EUMS would like to provide the following comments:

Section 2.2 styles/forms:

Modify the second paragraph as follows:

Ground chilli pepper or/and ground paprika is the product obtained by grinding whole dried chilli pepper or paprika with or without the placenta, seeds, **with or without** calyx and stalk **stem1**, without any other added matter.

1The proportion of stems incorporated in chili peppers and paprika should be limited to a strict minimum.

Rationale: Stems are a natural part of pods and ground during processing of paprika. While some whole chili (Birdseye) are marketed with calyx and stem still on the pod, for reasons of consumer protection the use of the peduncle should be limited to the strict minimum.

Section 3.2.3 Classification

Add grades as an alternative to classes as “grade” is a commonly used trade term.

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly “inspection mark” means.

Annex I, Table 2

- Moisture %: retain the value of 11

- Total ash: retain the square-bracketed values of 10
- Pungency Scoville Units: Modify "Pungency Scoville Heat Units (SHU)"
- Capsaicin content: remove this column because pungency is already expressed in SHU. A footnote could be introduced indicating the conversion factor between SHU and capsaicin (1.000 ppm capsaicin = 16.000 SHU)
- Colour Value of ground paprika: the only value that should be retained for class I is 120, since it should be higher than 100 for class II and 80 for class III.

Proposed Draft Standard for dried seeds – nutmeg

CX/SCH 21/5/9, Agenda Item 8

Mixed Competence

Member States Vote

The European Union and its Member States (EUMS) would like to thank Indonesia for leading the electronic working group on nutmeg.

The EUMS would like to provide the following comments:

Section 4 Food additives

The EUMS seriously question the technological need for all food additives listed in Table 3 of the General Standard for Food Additives (CXS 192 - 1995) as in all other standards for dried herbs and spices only the anticaking agents listed in Table 3 are allowed and only in grounded/powdered product.

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly "inspection mark" means.

Annex I

Physical requirements and classification for nutmeg

- 1) Regarding shell condition: the EUMS understand that nutmeg in shell can be traded locally, but the condition of the shell is not an international parameter which can be controlled. Therefore, the EUMS propose to add an asterisk to this qualitative criteria, with a footnote as follows: '*Shell condition can be a parameter for local trade, but not for compliance for the international market.*'
- 2) Regarding the number of seeds per kg, the EUMS propose to delete the 180 and 220 values for whole shelled seeds in class I and II, respectively, because the number of seeds/kg is related more to quality preferences and could be added to the companies' specifications.
- 3) Regarding volatile oil contents: The content of volatile oils is highly variable, depending on the place where the nutmegs have grown, on the age of the tree, on the experience of the producers and on the degree of ripening of the seeds. Therefore, the EUMS propose to add the following ranges of values:

- Whole: 3.5-11%

- Broken: 3.0-11%

- Ground/powdered: 2.5-11%

Annex II

Chemical requirements for Whole, Broken and Powder Nutmeg

Regarding Calcium as Calcium Oxide, % mass fraction (dry basis), max:

Our understanding is that Calcium is not used for whole nutmeg. Therefore, the EUMS propose to delete the Ca specification for whole nutmegs.