



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 4.1

CX/SCH 21/5/4 Add.1

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

Fifth Session

Kochi, Kerala, India, 26 - 30 April 2021

DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS — DRIED OR DEHYDRATED GINGER

Comments at Step 6 (Replies to CL 2019/97/OCS-SCH)

Comments of Chile, Colombia, Cuba, European Union, Iraq, United States of America, CCTA and IOSTA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2019/97/OCS-SCH issued in October 2019. 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 **Annex I** and are presented in table format.

3. As a result of the rescheduling of the CCSCH5 session from 21-26 September, 2020 to 26-30 April 2021, the timelines for the EWG on dried or dehydrated Ginger were adjusted. The EWG is continuing its work including addressing the attached comments.

Annex I

DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS — DRIED OR DEHYDRATED GINGER

Comments at Step 6 (Replies to CL 2019/97/OCS-SCH)

TEXT/COMMENT	MEMBER/OBSERVER - JUSTIFICATION
<p>Cuba welcomes the opportunity to raise comments regarding the RAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS: DRIED OR DEHYDRATED GINGER, and they are:</p> <p>Table 4. Chemical requirements for roots, rhizomes and bulbs.</p> <p>It is in the Annex II, in the column 8, first row, foreign matter, we think it should be extraneous matter.</p>	Cuba
we agree with draft standard for dried roots, Rhizomes and Bulbs- Dried or dehydrated Ginger without any comments.	Iraq
1 SCOPE	
<p>This Standard applies to dried roots, rhizomes and bulbs in their dried or dehydrated form as spices or culinary herbs, defined in Section 2.1 below, offered for direct consumption, as an ingredient in commercial food processing, or for repacking if required. It excludes products for industrial processing.</p>	<p>Colombia We suggest to remove the word “comercial” as adjective, as it is confusing</p>
<p>Table 1 <i>Zingiber officinale</i>, Roscoe Roscoe</p>	CCTA
2.2 Styles/forms	
<p>Ginger is the dried, peeled or unpeeled rhizome of <i>Zingiber officinale</i> Roscoe, in irregular pieces not less than in length, in slices, in small cut pieces or ground. The ginger shall be yellowish-white in colour. It can be peeled or scraped, then washed and dried. The ginger may be lime bleached. Ginger may be graded on the basis of place of production, type of processing or colour.</p>	IOSTA
<p>3. ESSENTIAL COMPOSITION AND QUALITY FACTORS The U.S. believes it is important to include the following section: 3.2.3 Adulteration Dried roots, rhizomes and bulbs shall be free from any economic adulteration</p>	USA
<p>3.2.2 Chemical and physical characteristics In accordance with the chemical and physical characteristics in Section 3.2.2, dried roots, rhizomes and bulbs may be classified into the following grades:</p>	<p>Chile There is no specifications of those classification (it would have to be done)</p>
<p>3.2.3 Classification (optional) Please note this edit: add II after the word class. When unclassified/ungraded, the provisions for class/grade class <u>II/grade II</u> apply as the minimum requirements.</p>	USA
7 WEIGHTS AND MEASURES	<p>Colombia It mentions details regarding packages, but it does not mention anything related with weights and measures</p>
<p>7. Pesos y medidas Packages shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.</p>	Colombia
<p>7. Weights and Measures Packages shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.</p>	CCTA

"Containers shall be as full as practicable...", in other words, they must be as full as it is practicable																						
<p>8.2.3 Variety or cultivar, trade name/type may be listed <u>stated</u> on the label.</p> <p>Due to a translation error, the word used is inappropriate, we recommend to change the word "listed" by "stated"</p>	Colombia																					
<p>8.3.1 Country of origin/country of <u>harvest, year of</u> harvest shall be indicated and the region of production may be indicated.</p>	<p>Colombia It's important to mention the year of harvest</p>																					
<p>8.4 Comercial <u>presentation</u>identificación</p>	<p>Colombia There is ambiguity if the word "identification" is used it is suggested to use the word "presentation"</p>																					
<p>8.6 Labelling of non-retail containers</p> <p>Information for non-retail packaging shall be given either on the packaging or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer, country of origin, packer, distributor or importer, as well as storage instructions, shall appear on the package. However, lot identification, and the name and address of the manufacturer, packer, distributor or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents, <u>it must be ensured the traceability of each one of the production stages.</u></p>	<p>Colombia</p> <p>We suggest to highlight the traceability systems that should be implemented and to guarantee the relevant information in each one of the production stages</p>																					
<p>9. METHODS OF ANALYSIS AND SAMPLING</p> <p>We recommend adding to the table a column on Calcium (as oxide) on dry basis by mass, max %</p> <p>This would apply to dried ginger and can be:</p> <ul style="list-style-type: none"> - (unbleached) or - 2.5 (bleached)* and <p>a) with the footnote</p> <p>*Bleaching is optional, and determined by contractual agreement between buyer and seller.</p> <p>b) with the notes:</p> <ul style="list-style-type: none"> - Sulfur dioxide shall not be detected - Ash content is affected by the presence of calcium addition and should not be the same for bleached ginger but should be higher. 	USA																					
<p>9.2 SAMPLING PLAN</p> <p>The U.S. recommends the following Type 1 methods for the below parameters and associated principle.</p> <table border="1" data-bbox="165 1581 1032 2072"> <thead> <tr> <th>Parameter</th> <th>Method</th> <th>Principle</th> </tr> </thead> <tbody> <tr> <td>Moisture</td> <td>AOAC 986.21</td> <td>Distillation</td> </tr> <tr> <td>Total Ash on dry basis</td> <td>AOAC 941.12</td> <td>Gravimetry</td> </tr> <tr> <td>Acid Insoluble Ash on dry basis</td> <td>AOAC 941.12</td> <td>Gravimetry</td> </tr> <tr> <td>Volatile Oil on a dry mass</td> <td>AOAC 962.17</td> <td>Distillation followed by Volumetry</td> </tr> <tr> <td>Extraneous Matter</td> <td>AOAC 916.01</td> <td>Visual Examination followed by Gravimetry</td> </tr> <tr> <td>Foreign Matter</td> <td>AOAC 960.51</td> <td>Visual Examination followed by Gravimetry</td> </tr> </tbody> </table>	Parameter	Method	Principle	Moisture	AOAC 986.21	Distillation	Total Ash on dry basis	AOAC 941.12	Gravimetry	Acid Insoluble Ash on dry basis	AOAC 941.12	Gravimetry	Volatile Oil on a dry mass	AOAC 962.17	Distillation followed by Volumetry	Extraneous Matter	AOAC 916.01	Visual Examination followed by Gravimetry	Foreign Matter	AOAC 960.51	Visual Examination followed by Gravimetry	USA
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<p>Table 3: Chile proposes that:</p> <ul style="list-style-type: none"> - <u>total ash</u> in all forms of presentation be 7.5 - The % of calcium be a maximum of 1% as calcium oxide. <p>All this would be justified with the bibliography sent in the following link: https://rdu.unc.edu.ar/bitstream/handle/11086/4735/INTRODUCCION%20DE%20Zingiber%20officinalis%20EN%20EL%20DEPARTAMENTO%20MARCOS%20JU%20C3%81REZ%20-%20Biagiotti%20C%20Mat%C3%A4Das.pdf?sequence=1&isAllowed=y</p> <p>The source defines the product as: "With the name of Ginger, it is understood the rhizome washed and dried of the official Zingiber Roscoe, decorticated (white or peeled ginger) or not (gray ginger). It should not contain more than 7% of total ash at 500-550 ° C; 2% ash insoluble in 10% hydrochloric acid; 8% crude fiber; 1% calcium calculated as calcium oxide, no less than 1% essence; 42% starch , or 12% cold water extract.</p> <p>Table 4: Excessive value for <u>visible mold and insects</u>. Consider associated mycotoxins. Especially for ground ginger, since it is already processed. Chile proposes 0 for grinding. The same for foreign matter and extraneous matter.</p>	<p>Chile</p>
<p>Table 3: Ash content is affected by the presence of calcium addition and should not be the same for bleached ginger. It should be higher.</p>	<p>IOSTA</p>
<p>Table 3: The values indicated reflect established industry and regulatory trade practices. We suggest revising values for <u>Ginger/whole,</u> - excreta mammalian mg/kg (max) from 1.0 to 6.6 <u>Ginger/pieces,</u> - excreta mammalian mg/kg (max) from 1.0 to 6.6 <u>Ginger/ground</u> - excreta mammalian mg/kg (max) from 0 to 1.0 Dry ground ginger is often made from dried whole or pieces of ginger; therefore, it is impractical to set this tolerance at "0." The U.S. recommends a maximum of 1.0mg/kg. We support removing brackets for ground/mould visible/insect defiled infested %w/w max. The U.S. supports retaining the tolerances for mould in ground ginger-ground spices and culinary herbs are not immune from mould</p>	<p>USA</p>
<p>Table 3: <u>The counts for whole dead insects, excreta mammalian, other excreta, contamination, extraneous matter and foreign matter should be zero.</u></p>	<p>Colombia It shouldn't be allowed any percentage of the above parameters, due to sanitary and phytosanitary risks.</p>
<p>Table 3: In Table 4, "Extraneous Matter" should be translated by "Materia Extraña" instead of "extranjera (from other country?)"</p>	<p>CCTA</p>

European Union comments

Mixed Competence

European Union Vote

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

The Circular Letter CL 2019/97/OCS-CCSCH refers to document REP19/SCH para. 39, and Appendix III, and REP19/CAC para 85.

The EUMS take note that CCSCH4 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 CCSCH 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 shall be amended accordingly.