

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 9

CRD31

Original language only

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

Fifth Session

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Comments from United Kingdom

1. The United Kingdom would like to make the following comments on Agenda item 9 in relation to section 3 Essential Composition and Quality Factors with the aim of
 - 1.1. Accelerating work progression by suggesting ways to improve efficiency of standard development within CCSCH given its heavy agenda.
 - 1.2. Addressing some members' concerns about some parameters in the "Physical Characteristics" Table.
 - 1.3. Addressing the suggestion in CRD7 that CCSCH needs to consider how to address the lack of values for chemical and physical characteristics in the absence of pre-existing private or public sector standards.

UK Comments

2. Firstly, while we do acknowledge there is unavoidable contamination that occurs from harvesting raw plant material from the natural world the scope of every standard **clearly excludes products intended for industrial processing**. Therefore, the products we are deciding limits for are those offered for direct consumption, as an ingredient in food processing or for repackaging. Our ambitions should therefore be to use a minimisation approach as already provided for in section 5 and section 6 of all standards; CXC 75-2015 in particular provides details on how to **minimize contamination, including microbial, chemical and physical hazards**.
3. We have noticed that the **number of parameters that are being decided within each standard (for each style, class of SCH) is potentially inhibiting progression of work** since large amounts of time is spent debating values for these and we have a great number of SCH standards (109) listed for our future programme of work.
4. Many of the physical parameters are provided for in CXC 75-2015 (but not the levels) however this section is still important as some parameters relate to specific characterising aspects of SCH. A simplification of the table would facilitate concentration on these important aspects with less focus on some of the general defects that are already provided for through the intentions of section 5 and section 6 of all standards; CXC 75-2015 in particular.
5. Simplification could also help with agreement on standards since some countries are not content with some of the levels and/or do not have supporting data on the appropriate levels or methods; noting that codex standards should reflect current practices, not add unnecessary burdens on producers, and facilitate trade. More prescriptive requirements can be agreed on a voluntary basis between buyer and seller and countries are still able to set national rules.
6. The codex principle of consumer protection is also important which is why a minimisation approach is

favourable. Production practices relate to individual producer capabilities, geo-climate zones/seasonality and technological limitations so a less prescriptive/overarching minimisation approach would enable these differences to be accounted for and ensure SCH standards can be easily agreed and applied.

7. Optional alternative approach:

7.1. Agree general definitions for foreign matter and extraneous matter (overall or for each group/SCH).

7.2. Combine parameters¹ under the general term “foreign matter” and agree a limit (overall or for each SCH) **AND/OR** have a statement that stipulates SCH shall be safe and suitable for human consumption and shall be free from foreign matter which includes but is not limited to living insects and filth (impurities of animal origin, including dead insects) in amounts which may represent a hazard to human health (which would simultaneously address concerns raised by CAC (agenda item 2)) (the statement being our preferred approach).

7.3. Agree a limit for extraneous matter (overall or for each SCH) e.g. ESA Quality Minima document specifics 2% and 1% for all herbs and spices respectively.

7.4. Based on the above suggestions see suggested text proposal of section 3, APPENDIX II of CX/SCH 21/5/10 Add 1. containing the Group layout template:

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1.1 Basic Ingredients

[INSERT NAME OF GROUP] as described in section 2. Product Definition.

3.1.2 Composition for common and trade names

The common name may be used if the product is a blend of the different species listed under the scientific names for that general name. When a trade name is used for a product, the product must contain a minimum of 80% of the species listed for the trade name.

3.2 Quality Criteria

3.2.1 General

[INSERT NAME OF GROUP] shall be safe and suitable for human consumption.

[INSERT NAME OF GROUP] shall be free from foreign matter which includes but is not limited to living insects and filth (impurities of animal origin, including dead insects) in amounts which may represent a hazard to human health.

3.2.3 Odour, Flavour and Colour

[INSERT NAME OF GROUP] shall be free from any foreign odour or flavour, especially from mustiness. They should have the characteristic odour, flavour and colour of the spice considering the geo-climatic factors/conditions/varieties and the chemical strain of the main components of the volatile oil indicated in the Annex.

3.2.3 Classification (optional) In accordance with the Chemical and Physical Characteristics in Section 3.2.4, where appropriate, whole, pieces, or ground/powdered dried fruits and berries may be classified into the following grades:

- Extra*
- Class/ Grade I*
- Class/Grade II*

When [INSERT NAME OF GROUP] are traded as both classified/graded and unclassified/ungraded, the minimum chemical and physical requirements for class/grade II apply as the minimum requirements for

¹ Insect fragments, rodent filth, shrivelled immature broken dead whole insects count, mammalian and other excreta, insect defiled/infested, live insects including any alternative wording used across standards.

unclassified/ungraded.

[INSERT NAME OF GROUP], as described in section 2, shall comply with chemical and physical characteristics in Annex 1 and Annex 2. The defects allowed must not affect the general appearance of the product as regards to its quality, keeping quality and presentation in the package.

3.2.4 Specific Chemical and physical characteristics

Specific/additions chemical and physical characteristics for [INSERT NAME OF GROUP] are detailed in the corresponding Annexes 1 and 2. The defects allowed must not affect the general appearance of the product as regards to its quality, keeping quality and presentation in the package.

Annex I Chemical Characteristics

<i>CSH</i>	<i>Style</i>	<i>Class (optional)</i>	<i>Moisture % w/w (max)</i>	<i>Total ash (dry basis) %w/w (max)</i>	<i>Acid insoluble ash (dry basis) % w/w (max)</i>	<i>Volatile Oils ml/100g (min)</i>	<i>Other Parameters*</i>
		<i>Extra</i>					
		<i>Class I</i>					
		<i>Class II</i>					

*Parameters specific to a SCH can be added in further columns e.g. calcium oxide content in dried ginger and capsaicin content for chilli and paprika

Annex II Physical Characteristics

<i>CSH</i>	<i>Style</i>	<i>Class (optional)</i>	<i>Extraneous Matter* % w/w (max)</i>	<i>Foreign matter** % w/w (max):</i>	<i>Other Parameters***</i>
		<i>Extra</i>			
		<i>Class I</i>			
		<i>Class II</i>			

* Extraneous matter is [INSERT GENERAL OR GROUP SPECIFIC DEFINITION]

**Foreign matter [INSERT GENERAL OR GROUP SPECIFIC DEFINITION e.g. "includes Insect fragments, rodent filth, shrivelled immature broken dead whole insects count, mammalian and other excreta, insect defiled/infested, live insects"]

***Parameters specific to a SCH can be added in further columns e.g. Mould visible % w/w (max) or insect damaged leaves/flowers max % mass fraction