CODEX ALIMENTARIUS COMMISSION

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 3.3 **CX/SCH 24/7/5 Add.1**

January 2024

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Seventh Session

Kochi, Kerala, India

29 January – 2 February 2024

DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED FRUITS AND BERRIES: PART B - REQUIREMENTS FOR VANILLA

Comments in reply to CL 2023/55/OCS-SCH

Comments of Brazil, Canada, Chile, Egypt, Indonesia, Iraq, Madagascar, Malaysia, Mauritius, Peru, Saudi Arabia, Thailand, Uganda

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/55/OCS-SCH issued in October 2023. 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 Annex

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

ANNEX I

General comments

COMMENT	MEMBER / OBSERVER
Indonesia thanks USA as well as Madagascar, Mexico and India for preparing this draft. We continue to support the standard development as well as using the standard template approach for group standards.	**Indonesia**
Agree. Regards	**Iraq**

Specific comments

2.2 Style. Whole beans/Split beans	
a). What is "split vanilla"? Are the beans split longitudinally through their entire length? Or only the split ends? If split vanilla beans it is the latter, then, A split vanilla bean is a bean which has a split at its end. The beans split longitudinally, that is along the length. But the split length can vary from some mm to the whole length or to the top part.If **What is the maximum length of split allowed?** There is no restriction or maximum allowed length. A visible split is simply called split vanilla **Is the split limited to being along the natural suture/seam of the bean or any vertical split of the ends of the bean?** The split is along the length **Is there any requirement for the split part of the bean to contain vanilla seeds/caviar?** There is no such requirement… split beans can be without seeds as the latter have fallen down/out **Is there an allowance for split beans among whole? Or can the entire lot be split beans only?** The question is not too clear…but usually split beans are not sold together with non split beans.	**Mauritius**
a). What is "split vanilla"? Are the beans split longitudinally through their entire length? Or only the split ends? If split vanilla beans it is the latter, then, Split vanilla is defined as a vanilla whose dehiscence line is engaged/open. It should be noted that Madagascar vanilla planifolia splits naturally on the vines after a certain level of maturity. **What is the maximum length of split allowed?** The bean is always called split, whatever the length of the opening. **Is the split limited to being along the natural suture of the bean or any vertical split of the ends of the bean?** The slit is located along the dehiscence line. **Is there any requirement for the split part of the bean to contain vanilla seeds/caviar?** The seeds come out when the beans split; some may remain, but this is not a selection criterion **Is there an allowance for split beans among whole? Or can the entire lot be split beans only?** The entire lot can contain be split beans only.	**Madagascar**

b). How does the splitting of vanilla affect moisture and vanillin content – at it exposes a greater surface of the vanilla bean to the atmosphere. Moisture content does not depend on whether the vanilla is split or non split. It depends on the grade, that is a vanilla bean of 16 cm having a split of 11 cm can have a higher moisture content than a non split vanilla bean of 16 cm. Moisture content depends on the grade of the vanilla beans, that is, a gourmet bean will have a higher moisture than a US grade and red TK. Concerning the vanillin content of split and non split, such test has not been done yet. and data is not available at our level.	**Mauritius**
b). How does the splitting of vanilla affect moisture and vanillin content – at it exposes a greater surface of the vanilla bean to the atmosphere. There is a difference in aroma between split and unsplit beans. The same applies to vanillin content and moisture content. Vanillin levels are higher in split beans because they are more mature. Split beans also generally have a lower moisture content.	**Madagascar**
Indonesia supports Option 2. *Rationale*: as Indonesian comment on 2nd proposed draft standard, Indonesia supports Germany's comment that it is not common to specify total ash and insoluble ash for vanilla. Also, Indonesia supports option 2 by stating that the characteristic just for the Planifolia type.	**Indonesia**
Option 3 – This option is a table with chemical characteristics per specie without total ash and acid insoluble ash requirements. Thailand support the option 3 to be considered in the meeting.	**Thailand**
Option 3 – This option is a table with chemical characteristics per specie without total ash and acid insoluble ash requirements. Madagascar opts for option 3. The country proposes values for the species Vanilla planifolia, and proposes a moisture content between two values, so the word "maximum (max.)" should be removed from the header of the Moisture Content column. Madagascar also proposes replacing the column heading Vanillin content as a % of the raw material marketed with Vanillin content on a dry basis g/100g.	**Madagascar**
Option 4 – This table provides the chemical characteristics for each individual vanilla specie. Uganda is in agreement with option 4	**Uganda**
SCOPE	
Egypt suggests to add the word (pods) in the item (Scope) to be : This standard applies to vanilla (cured vanilla beans/pods) as defined in Section 2.1 below, *Rationale:* A vanilla "bean" is the pod of the vanilla fruit of orchids in the genus Vanilla.The two terms (bean/pod) are used botanically and in trade. Vanilla is from the dried, cured beans or fruit pods of the green-stemmed climbing perennial of the Vanilla species, which is a member of the orchid family. The botanical name, Vanilla, derives from the Spanish name for the spice, vanilla, and is a diminutive of *vaina* meaning "sheath or pod". https://www.mccormickscienceinstitute.com/resources/culinary-spices/herbs-spices/vanilla .	**Egypt**
This standard applies to vanilla (cured vanilla beans) as defined in Section 2.1 below, ~~and~~ offered for direct ~~human~~ consumption, as an ingredient in food processing or for	**Thailand**

repackaging if required. ~~This standard does not apply to these products when intended~~ It excludes the product for industrial processing. To be in line with the existing standards.	
DESCRIPTION	
Vanilla ~~beans~~beans is the product obtained from curing and drying of the fruit of Vanilla species ~~belonging to the varieties~~ listed in Table 1: Thailand would like to propose a new text to describe how vanilla is obtained.	**Thailand**
Table 1: Variety of vanilla covered by this standard.	
Mexican vanilla Does Mexican vanilla belong to the Vanilla planifolia Andrews species?	**Madagascar**
Tahitian ~~vanilla~~vanilla	**Thailand**
Vanilla tahitensis ~~*J.W.*~~J.W. Moore (Orchidaceae)	
Vanilla cribbiana Soto Arenas~~*Soto Atenas*~~ (Orchidaceae)	
2.2 Styles	
Under the Item 2. “Styles” we suggest to keep the “Whole beans” and “Split beans” in two different categories of vanilla. In this case instead of four styles, we will have five styles proposed in the standard: • Whole beans • Split beans • Cut/broken • Seeds/vanilla caviar • Ground/powdered; processed into a powder Rational: Our understanding is that this differentiation is necessary for the transparency and the correct information for the consumer in the labelling according with the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985) “Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect”. Two important properties - the moisture and vanillin content - in vanilla beans are crucial for the quality and flavor and are related with the peak ripeness when the vanilla pod splits start opening just slightly at the tip of the vanilla bean pod. The Vanilla beans are sold either split or non-split and this characteristic should be captured under the proposed standard.	**Brazil**
Whole beans/ **[split beans]** Indonesia supports that split beans as part of whole beans. *Rationale:* It is common that split beans might be mixed with whole beans during the trade/distribution. Regarding to the main unresolved issues, split beans are vanilla that is split starting at the tip where the split can reach approximately 20% of the bean’s length.	**Indonesia**
Whole beans/ **[split beans]** Egypt doesn’t agree with inclusion the split vanilla beans as one of the styles. Egypt Suggests to allow a percentage (%) of split beans or number of split beans/100 beans as “Defective beans” in Table 2. Physical Characteristics for vanilla *Rationale:*	**Egypt**

The splitting will expose of the split vanilla beans to the atmosphere necessarily affects the moisture and vanillin contents which can make it a factor affecting the quality. The splitting also may cause the internal sticky content of the vanilla beans to come out leading to handling problems.	
Whole beans/**[split beans]** Chile agrees that split beans should be left as an independent style. This is because, based on experience, the fact that the bean is whole is an important characteristic for users of vanilla. So, the very fact that it is split, already qualifies to treat it as a different product. Besides, as the contact surface increases, it is possible that the active elements that give vanilla its properties escape, as they are very volatile. So, there would be differences with respect to whole beans.	**Chile**
Other styles, other than the four styles that have been mentioned are permitted, if they are labelled accordingly. Chile agrees that split beans should be an independent style and therefore it suggests that there should be 5 styles. This is because, based on experience, the fact that the bean is whole is an important characteristic for users of vanilla. So, the very fact that it is split, already qualifies to treat it as a different product. Besides, as the contact surface increases, it is possible that the active elements that give vanilla its properties escape, as they are very volatile. So, there would be differences with respect to whole beans.	
ESSENTIAL COMPOSITION AND QUALITY FACTORS	
Vanilla as described in Section 2. Indonesia proposes the text should be written as follows: Vanilla bean as described in Section (2) shall confirm to the requirements specified in Annex 1.	**Indonesia**
Vanilla as described in Section ~~2~~2 shall conform to the requirements contained in Annex I and II. To be in line with the existing standards.	**Thailand**
Quality ~~Criteria~~factors	
Quality ~~Criteria~~criteria	**Canada**
3.2.3 Chemical and physical characteristics Uganda recommends that in table 1 on chemical characteristics, the column on total ash can be deleted from the table but maintain the acid insoluble. *Rationale:* It was noted that total ash has no safety issue in relation to quality of the product but rather it only reflects that the mineral contents.	**Uganda**
HYGIENE	
The products should comply with any microbiological criteria established in accordance with the *Principles for the Establishment and Application of Microbiological Criteria ~~for~~Related to Foods* (CXG 21-1997).	**Thailand**
LABELLING	
Country of~~ o~~Origin~~rigin~~ and country of harvest.	**Canada**
Country of harvest ~~(optional)~~ (optional)**~~[mandatory]~~** Thailand support to specify country of harvest as optional in the provision of labelling.	**Thailand**
Country of harvest ~~(optional)~~ (optional)**~~[mandatory]~~** Indonesia supports that Country of harvest remains optional.	**Indonesia**

Rationale: It is complex to prove country of harvest in trade practices and preference for “optional” is also in line with CCFL's advice to CCSCH in other Draft Standard under CCSCH.	
Country of harvest (optional) **[mandatory]** Egypt agrees with the Country of harvest to be mandatory *Rationale:* There are two main characteristics that determine the flavor, appearance, and aroma of a vanilla bean: Origin and Species, the location which the vanilla is grown plays a large role in the aroma and flavor profiles of a vanilla bean. This is due to each country having a unique method of curing and drying vanilla beans. So many unique curing processes results an equally large difference in flavors produced by the vanilla bean.	**Egypt**
Country of harvest (optional) **[mandatory]** Canada notes the discussion at CCFL47 on the endorsement of labelling provisions for saffron (REP23/FL), where the Committee agreed to: i. endorse all the labelling provisions in the Standard for Dried Floral Parts – Saffron except the country of origin (8.3.1) and the country of harvest (8.3.2); and ii. refer the above two provisions to CCSCH for reconsideration, and to request CCSCH to clarify the distinction between country of origin and country of harvest; provide the rationale why the provision for the country harvest should be mandatory and how such a declaration would be beneficial for fraud prevention. We also note the discussion at CCEXEC84 where the Committee encouraged CCSCH, following the meeting in January 2024, to provide, as requested by CCFL, a clear rationale and robust justification for why the provision for country of harvest should be mandatory as this clarification was important in relation to the application of the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985) and should then be discussed at CCFL48. In light of these discussions, and to avoid delays in standard development, Canada supports maintaining the provision for Country of harvest as optional, in line with all 9 adopted CCSCH standards.	**Canada**
Country of harvest (optional) **[mandatory]** Country of harvest shall be declared	**Saudi Arabia**
Country of harvest (optional) **[mandatory]** Madagascar proposes that it should be mandatory to indicate the country of harvest on the label. The justifications are as follows: 1. Traceability, Transparency and Differentiation: The mandatory inclusion of the 'country of harvest' on labelling is intended to meet growing consumer demand for traceability and transparency. This approach is in line with current trends in corporate social responsibility (CSR). By providing visibility on the specific cultivation methods used in each region, this transparency not only allows consumers to make informed choices, but also enables companies to differentiate themselves on the market by capitalising on the geographical authenticity of vanilla. References: CXG_060f, and principles applicable to product traceability/tracking as a tool in a food inspection and certification system CAC/GL 60-2006 2. Authenticity of the Terroir and Distinctive Varieties: The mandatory inclusion of the "country of harvest" on the label is fundamental to highlighting the impact of the terroir (encompassing climate and soil...) on the unique aromatic profile of vanilla. It also enables consumers to make informed choices based on their taste preferences, by recognising the characteristic flavour nuances associated with different vanilla varieties. In this way, the obligation to state the "country of harvest" helps to preserve and enhance the authenticity of the organoleptic characteristics specific to each origin. 3. Emotional Connection and Education:	**Madagascar**

The requirement to indicate the "country of harvest" creates a powerful emotional connection between the consumer and the geographical origin of the vanilla. This approach strengthens the emotional bond with the product, evoking stories and traditions associated with specific regions. In addition, this mandatory labelling provides an educational platform by allowing companies to inform consumers about the diversity of vanilla origins. By understanding how these geographical factors influence the final product, consumers gain a deeper understanding of vanilla as a product, promoting an enriched and conscious appraisal.	
Country of harvest (optional) **[mandatory].** Chile agrees that the country of harvest should be mandatory in the labelling. This product, in particular, is very dependent on the climate, for it to have certain characteristics and the climate is to do with the country of harvest.	**Chile**
Commercial ~~Identification~~ identification	**Canada**
Size (optional) Chile is in agreement with respect to adding the specification “weight, as applicable” as part of the commercial identification on the label. This should be flexible, because it depends on the understanding between the seller and purchaser. However, it is one more element of trade that cannot be used only for the whole style, but must also be used for the ground/powdered styles too.	**Chile**
Labelling of ~~-~~ n~~Non-Retail~~on-retail ~~-~~ c~~Containers~~ontainers	**Canada**
METHODS OF ANALYSIS AND SAMPLING	
Methods of ~~-~~ a~~Analysis~~nalysis[1]	**Canada**
SAMPLING PLAN	
Sampling Plan~~SAMPLING PLAN~~	**Canada**
Table 1. Chemical characteristics for vanilla	
Option 1. [Chemical Characteristics per style]	
Egypt agrees with the Option 1 - The highest and lowest Moisture Content values were placed in a range format. -The word “maximum (max)” should not be deleted from the heading of the Moisture Content column	**Egypt**
Total Ash on dry basis % w/w (max) Recommend total ash to be deleted. *Rationale:* Total ash has no safety issue towards the product but relates to the minerals	**Uganda**
Whole **Moisture content %w/w [(max)] -** ~~25-38,~~ 35 **Vanillin Content on dry basis g/100g -** 1.2-2 **Cut/Broken** **Moisture content %w/w [(max)] -** ~~25-38~~18-38~~25-38,~~ 20~~,~~ 10~~-25~~ **Vanillin Content on dry basis g/100g** deleting 1.6: 1.6-2.0 **Ground/powdered** **Vanillin Content on dry basis g/100g -** 1.0-1.5 **Vanilla caviar** **Moisture content %w/w [(max)]** Egypt suggests to be with in range as the rest of forms **Vanillin Content on dry basis g/100g -** 0.2-2.0	**Egypt**

Option 2. [Chemical Characteristics] without Total ash and Acid Insoluble Ash	
Chile believes that the values of extraneous matter in the ground/powdered styles and seeds/caviar should be N/A, because it is not possible to determine this with the method of analysis that is being used, which is visual examination by gravimetry. **Whole Moisture content % w/w (max) <15** Chile believes that the values of foreign matter in the ground/powdered styles and seeds/caviar styles should be N/A, because it is not possible to determine this with the method of analysis that is being used, which is visual examination by gravimetry.	**Chile**
Indonesia supports Option 2. *Rationale:* as Indonesian comment on 2nd proposed draft standard, Indonesia supports Germany's comment that it is not common to specify total ash and insoluble ash for vanilla. Also, Indonesia supports option 2 by stating that the characteristic just for the Planifolia type.	**Indonesia**
Option 3. [Chemical Characteristics per specie per style] without Total Ash and Acid Insoluble Ash Requirements	
Option 3. [Chemical Characteristics per specie per style**]** without Total Ash and Acid Insoluble Ash Requirements Uganda recommends that considering that the vanillin content is within the range of the lower and upper limits, a single range is used instead- 0.2 - 2.4.	**Uganda**
Vanillin content in % of marketed raw material **Whole/split** Vanillin content on dry basis g/100g Whole split: 15-25 Moisture content: 15-38 (unsplit) Moisture content: 15-25 (split) Vanillin content: > 1.4 (split) Vanillin content: > 1.5 (unsplit) **Broken/chopped** Water content: 10-25 Vanillin content: > 1 Ground/powdered <15 Vanillin content: >1.2 **Seeds/ [caviar]** **N/A, tasteless** Vanillin content: > 0.2 In general, aromatic products containing vanillin are found in the pulp rather than in the seeds.	**Madagascar**
Table 2. Physical Characteristics for vanilla	
Extraneous Egypt suggests to add a definition for the extraneous matter under Table 2	**Egypt**
[Shriveled immature broken %w/w (max)]	

Egypt Suggests: Defective beans (Shriveled, immature, broken and split %w/w (max)]	
Whole/split Egypt doesn't agree with inclusion the split vanilla beans as one of the styles. Egypt suggests to allow a percentage (%) of split beans [Splits among whole % w/w] or number of split beans [no./100 beans] as "Defective beans" in Table 2. Physical Characteristics for vanilla *Rationale:* The splitting will expose of the split vanilla beans to the atmosphere necessarily affects the moisture and vanillin contents which can make it a factor affecting the quality. The splitting also may cause the internal sticky content of the vanilla beans to come out leading to handling problems. Egypt agrees with the Size Tolerance% w/w (max)]	
Indonesia proposes to include clear definition (such as in foot note) for Color Tolerance and Size Tolerance. Indonesia proposes the value of shrivelled immature broken max 10. *Rationale:* It is common that cut/broken style has more shrivelled immature broken than whole beans.	**Indonesia**
Extraneous matter % w/w (max)matter[3]	**Malaysia**
[2] [N/A] Not applicable, means that this form of the above product has not been evaluated for this provision, and currently there are no values. N/A does not refer to zero.[3] Extraneous matter: Vegetative matter associated with the plant from which the product originates but not accepted as part of the final product. - To align with other SCH standards by providing description for extraneous matter.	
Thailand would like to propose to remove the parameters of shriveled, immature and broken, color and size tolerance from the table 1. This is because these parameter do not have a clear analysis method and its could be accepted by agreement between the trading partners.	**Thailand**
Table 1. Methods of Analysis for vanilla	
Indonesia proposes to include clear definition of Shrivelled Immature Broken (such as in foot note) and method for measuring it. *Rationale:* Previous proposal of Indonesia on 1st proposed draft standard to include method for measuring Shrivelled Immature Broken is accepted and it counted on Physical Characteristics (Annex 1,Table 2), thus there must be a clear method for analysing Shrivelled Immature Broken. **Vanillin Content** Indonesia proposes to add method of analysis for Vanillin Content as follows: - Extraction followed by UV-Spectrophotometry	**Indonesia**
Distillation and HPLC followed by UV spectrophotometry According to ISO 5565-2, the method for analysing vanillin content is "distillation followed by HPLC" OR "distillation followed by UV spectrometry".	**Madagascar**
Uganda is in agreement with the test methods recommended in the table. *Rationale:* It was noted that these test methods are already verified thus can be used.	**Uganda**