

CODEX ALIMENTARIUS COMMISSION



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Organization of the
United Nations



World Health
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Agenda Item 6

SCH/03 CRD/6
Original Language Only

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

3rd Session

Chennai, India, 6 - 10 February 2017

PROPOSED DRAFT STANDARD FOR BLACK, WHITE AND GREEN PEPPER

Comments at Step 6

(Comments of the European Union, India, Indonesia, Kenya, Malaysia, Mali, Nigeria, Thailand)

EUROPEAN UNION

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

Section 3 – Essential composition and quality factors

Table 4: The EUMS believe that all classes/ grades of black and white pepper should have the same moisture content and this should be no more than **12%**.

Section 8.2 - Name of the product

8.2.3 Origin of the product

The standard as currently drafted seems to request a compulsory indication of the place of origin.

The EUMS consider that, as per the *Codex General Standard for the Labelling of Prepackaged Foods*, an indication of origin should be declared if its omission would mislead or deceive the consumer.

We would be grateful for additional information on the rationale for requesting such an indication.

INDIA

Para 3.2.3 Classification

Our comments: We propose to delete the following text along with the Table 2:

“When unclassified/ungraded (intended for further processing) the provisions for Class III requirements apply as the minimum requirements, except Table 3. In the place of Table 3, Table 2 is applicable”

Rationale: It is already defined under the scope of the document that the proposed standard is not applicable to the products intended for further processing. Thus inclusion of the above statement and Table 2 is redundant and will be in conflict with the Scope of the document.

We also propose to revise the scope as follows:

“This standard applies to dried or dehydrated peppers (Black, White and Green – abbreviated as BWG) from berries of *Piper nigrum* L. of the *Piperaceae* family ~~offered for industrial food production and for direct consumption or for repacking if required~~, **It offers BWG peppers for direct consumption and products which are packed in bulk for repacking and/or for direct sale to consumers.** It excludes BWG peppers for industrial processing”.

INDONESIA

In the matter for grouping peppers, the term “unclassified/ungraded” pepper is not clearly defined, bring through different interpretation related further processing. So that, Indonesia propose that the intended meaning of the term “unclassified/ungrading” BWG peppers should be clearly defined in the proposed draft standard to avoid misunderstanding.

Rationale:

The consensus of the products classification/grading is important in a standard since it will be used in international trading. So that, Indonesia would like to propose that the term “classification/grading” must be agreed by all the country.

Indonesia inform that the Indonesian standard for pepper only classify two kinds of classification/grading, which are Grade I and Grade II. It means, there are no products with spesification Grade III nor unclassified/ungrading pepper. If the term "unclassified/ungrading" is still used in this standard, it should be clearly defined. Indonesia also inform that Indonesia does not have a standard for green pepper.

As detail, Indonesia would like to propose the table 3, as follows :

Table 3. Physical characteristics for BWG whole peppers (classified/graded)

Physical characteristics	Requirements								
	Black			White			Green		
	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III
Bulk density, (g/l), min.	550	500	450	600	600	[550] [600]	NA	NA	NA
*1 Light berries, % (m/m) max.	2.0	5.0	10.0	1.0	2.0	2.0	NA	NA	NA
*2 Extraneous matter, % (m/m) max.	1.0	[1.0] 2.0	[1.0] [2.0]	1.0 [0.8]	[1.0] 1.5	[1.0] [2.0]	[0.5] [1.0]	1.0	[1.0] [1.2]
*3 Foreign matter, % (m/m) max.	Nil	0.5	0.5	Nil	0.5	0.5	Nil	0.5	0.5
Black berries/corns % (m/m), max	NA	NA	NA	5.0	7.5	10.0	Nil	Nil	5.0
Broken berries, % (m/m), max.	NA	NA	NA	2.0	3.0	3.0	1.0	[3.0] [7.0]	[4.0] [10.0]
Mouldy Berries /Corns % (m/m), max.	1.0 [Nil]	1.0 [2.0] [3.0]	[1.0] [2.0] [3.0]	1.0 [Nil]	[1.0] [2.0] 3.0	[1.0] [2.0] [3.0]	Nil	1.0	[1.0] [2.0]
Insect defiled berries /Corns % (m/m), max.	[1.0] [0.5]	[1.0] [2.0]	[1.0] [1.5] [2.0]	[1.0] [0.5]	[1.0] [2.0]	[1.0] [1.5] [2.0]	Nil [0.5]	1.0	[1.0] [1.5] [2.0]
Mammalian or/and other excreta by (mg/kg), max.	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
*4 Pinheads or broken berries, % (m/m) max.	[Nil] [1.0]	2.0	[3.0][4.0]	NA	NA	NA	NA	NA	NA

- Indonesia propose to open square bracket for extraneous matter in Class II/Grade II for black pepper is 2.0
- Indonesia propose to open square bracket for extraneous matter in Class I/Grade I for white pepper is 1.0 and for class II/Grade II is 1.5
- Indonesia propose to open square bracket for mouldy berries/corns in Class I/Grade I for black pepper is 1.0 and for grade II is 1.0
- Indonesia propose to open square bracket for mouldy berries/corns in Class I/Grade I for white pepper is 1.0 and for Class II/Grade II is 3.0

Indonesia would like to propose the table 4, as follows :

Table 4. Chemical characteristics for BWG whole peppers

Chemical characteristics	Requirements						
	Black			White			Green
	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	
Moisture content, % (m/m), max.	12.0	[12.0][12.5][13.0]	[12.0][13.0]	12.0	[12.0][13.0]	[12.0][13.0][14.0]	[9.0][12.0]
Total ash, % (m/m), max, on dry basis.	6.0	7.0	7.0	3.5	[3.5][4.0]	[3.5][4.0]	5.0
Nonvolatile ether extract, % (m/m) min, on dry basis.	7.0	7.0	[6.0][7.0]	6.0	6.0	6.0	0.3
Volatile oils1, % (ml/100 g) min, on dry basis.	2.0	[1.5][2.0]	[1.0][2.0]	1.5	1.5	1.0	1.0
Piperine content, % (m/m), min, on dry basis.	3.5 [4.0]	3.0 [3.5] [4.0]	[2.0][3.0]	4.0	3.5 [4.0]	[3.0]	NA
Acid-insoluble ash, % (m/m) max, on dry basis.	1.5	1.5	1.5	0.3	0.3	0.3	0.3

- a) Indonesia propose to open square bracket for Piperine content in Class I/Grade I for black pepper is 3.5 and for Class II/Grade II is 3.0
- b) Indonesia propose to open square bracket for Piperine content in Class II/Grade II for white pepper is 3.5

Indonesia would like to propose the table 5, as follows :

Table 5. Chemical characteristics for BWG ground peppers

Chemical characteristics	Requirements	
	*Ground black pepper	*Ground white pepper
Moisture content, % (m/m), max.	12.0 [13.0]	[12.0] 13.0
Total ash by mass, % (m/m), on dry basis, max.	6.0	[3.0] 3.5
Non-volatile ether extract, % (m/m) ,on dry basis, min.	6.0	6.0
Volatile oil1 , % (ml/100g), on dry basis, min.	[0.7] 1.0	[0.4] 0.7
Crude fiber, insoluble index, % (m/m) on dry basis, max.	17.5	6.5
Piperine, % (m/m), on dry basis, min.	[1.5] 3.5 [4.0]	[2.0] 4.0
Acid insoluble ash, % (m/m) on dry basis, max.	1.2	0.3

*Ground peppers include all its forms as per 2.2(b).

- a) Indonesia propose to open square bracket for moisture content in ground black pepper is 12.0 and for ground white pepper is 13.0
- b) Indonesia propose to open square bracket for total ash by mass in ground white pepper is 3.5
- c) Indonesia propose to open square bracket for volatile oil in ground black pepper is 1.0 and for ground white pepper is 0.7
- d) Indonesia propose to open square bracket for piperine in ground black pepper is 3.5 and for ground white pepper is 4.0

KENYA

We would like to appreciate the work done by EWG led by India and co-chaired by Indonesia and Cameroon and would like to submit the following comments

3.2.4 Chemical characteristics

Table 4. Chemical characteristics for BWG whole peppers

(The requirements for unclassified /ungraded is same as class III/grade II)

COMMENT

1. **Moisture content, % (m/m), max.** : Kenya proposes 12% Maximum Moisture content for all the categories . We have been obtaining the same value without any trade problems.

COMMENT

2.Total ash,% (m/m), max, on dry basis.- For all the categories we propose 7.0

Table 5: . Chemical characteristics for BWG ground peppers

Piperine, % (m/m), on dry basis, min. We propose 2%(m/m), on dry basis, min

MALAYSIA

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.2.2 Infestation

Malaysia is of the view that the term “practically free” is subjective, cannot be measured and would give different interpretations. Thus, Malaysia proposes an exact value to be determined or the term “practical” to be removed.

3.2.3 Classification

Malaysia notes that the Scope of this proposed draft standard excludes BWG peppers for industrial processing. However, Section 3.2.3 stipulated that there are specific physical and chemical requirements to be complied for unclassified / ungraded BWG (intended for further processing). Malaysia is of the opinion that the terms “industrial food production” and “further processing” should be clearly defined for better clarity and understanding.

3.2.4 Chemical characteristics

Table 4. Chemical characteristics for BWG whole peppers

EDITORIAL COMMENT

(The requirements for unclassified /ungraded is same as class III/grade ~~II~~ **III**)

Table 5. Chemical characteristics for BWG ground peppers.

Malaysia is of the view that current values for physical and chemical characteristics could be set higher to assure better quality of BWG pepper. Thus, to achieve this objective, Malaysia supports the following values:

Table 5. Chemical characteristics for BWG ground peppers

Chemical characteristics	Requirements	
	*Ground Black pepper	*Ground White pepper
Volatile oils ¹ , % (ml/100 g) min, on dry basis.	{0.7}{1}	{0.4}{0.7}
Piperine content, % (m/m), min, on dry basis.	{1.5}{3.5}{ 4 }	{2}{ 4 }
*Ground peppers include all its forms as per 2.2(b).		

¹The volatile oil content should be determined immediately after grinding

MALI

- Au point 3.3 Classification des "poivres défectueux" biffer la phrase entre parenthèse (~~sauf celles fondées sur les moyennes de l'échantillon~~)

Le Mali félicite et soutient le groupe de travail présidé par l'Inde et co-présidé par l'Indonésie et le Cameroun pour la préparation de l'Avant-projet.

NIGERIA

Nigeria supports the development of the Standard for Black, White and Green Pepper and commends the eWG led by India and co-chaired by Indonesia and Cameroon, for revising the proposed draft Standard. The standard will provide the quality characteristics and grading necessary to facilitate trade. Nigeria is pleased to submit the following comments:

3.2.3 Classification

- Nigeria supports the classification of BWG Pepper into Class I, II, and III as in the original text. This is in line with the classification in other CCSC draft Standards.
- *4 *Pinheads*: Nigeria supports the replacement of 'Unfertilized berries...' with 'Berries developed from unfertilized flowers.....', for better clarity.

THAILAND

General comment on Agenda item 4, 5, 6 and 7

In general, Thailand has no objection on the Draft Standard of Cumin and Thyme and Proposed Draft Standard of BWG pepper and Oregano. However, we do consider that all aforesaid documents should be in consistent with the adopted codex standard of other Codex committees. In addition, we would like to provide some suggestions as described below:

SECTION 1: SCOPE

1 The scope of the commodity standards for spices and culinary herbs should be similar in writing style, in which the main objective is for direct (human) consumption, whereas industrial food processing, catering purpose or repacking are the processes eventually intended for human consumption.

2 The phrase "intended for further processing" should be used as it has been commonly used in various adopted codex standard and the meaning is clearly defined as the processing of a product from its original state to other kinds of products.

3 The proposed definitions for "further processing" and "industrial processing" are unnecessary. The term "further processing" may cause confusion against "post-harvesting" activities, while the meaning of "industrial processing" is ambiguous because it is usually applied in a very large scale production. In fact, small scale production is also applied for the processing of dried spices and herbs such as homemade essential oils or incense.

4 Thailand would like to recommend the following template of revised Scope as follows: "This Standard applies to of the Family, offered as a condiment or an ingredient and for direct consumption, industrial food processing or repacking, if required. It does not apply to the product when indicated as being intended for further processing."

SECTION 3.2.2: INFESTATION

1. This section (infestation) should specify only for live insect by referring to the definition of the term "infestation (of a commodity)" in International Standard for Phytosanitary Measure (ISPM) No.5 Glossary of phytosanitary terms as follows: "**infestation (of a commodity)** means presence in a commodity of a living pest of the plant or plant product concerned. Infestation includes infection."

2. The dead insects, insect fragments and rodent contamination should be identified as filth and these parameters should be grouped into a new section, "Defects and allowances".

SECTION 3.2.4: PHYSICAL CHARACTERISTICS

1. We disagree with the inclusion of extraneous matters, foreign matters, insect damages or mold visible which specified under the section physical characteristics because all of these parameters are undesirable. In fact, they should be defined in section "defects" as the minimum acceptance is required. So, we would like to propose a new section, "defects and allowances" to cover these parameters. They should be specified as

minimum, or maximum, or ranges of acceptance values; otherwise they may be use to classify a commodity, if necessary.

2. The definitions of “extraneous matters” and “foreign matters” in the entire proposed draft standard should be correlated. In addition, we would like to support to use the term “extraneous vegetable matters” instead of “extraneous matters” for better clarification.

SECTION 3.4: LOT ACCEPTANCE

We would like to propose that the acceptable quality limit (AQL) level for each sampling plan should be identified in this section in the same format as in the adopted codex standard of processed fruits and vegetables.

SECTION 7: WEIGHTS AND MEASURES

We would like to propose to add additional requirements on “defective of container” and “lot acceptance” to provide an allowance of weight of defective container. Format of codex standard of processed fruits and vegetables may be used as guidelines.

Specific Comments on agenda item 6: Proposed Draft Standard for Black, White and Green Pepper

Thailand would like to provide suggestions on this document as follows:

1. We would like to propose to move the first 2 basic parameters in table 1, general size and shape for whole BWG peppers, to be under section 2.1, Product Definition for each type of pepper. Moreover, the other 2 basic parameters, colour and sensory property, should rather be indicated under section 3.2.1 Odour, flavor and colour in the same format as the draft standard for cumin and thyme.
2. We would like to propose the working group to reconsider the measurement unit of mammalian or/and other excreta in Table 2. The unit in mg/kg is not corresponding to the method of analysis in table 7, which is based on visual examination.
3. We would like to propose the working group to reconsider the measurement unit of live or/and dead insects and pests. The calculation of counted live or/and dead insects and pests in percentage is in doubt. In addition, the difference between “pests” and “insects” in this parameter should be clarified. However, we would like to propose to move this parameter to be under a new section, “Filth”.
4. We would like to propose to specified the value of mouldy berries/corns in class I of black pepper and white pepper in Table 3 as nil, as in green pepper.