

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 5.1

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

Fourth Session

Thiruvananthapuram, India, 21 - 25 January 2019

PROPOSED DRAFT STANDARD FOR DRIED CHILLI PEPPERS AND PAPRIKA

Comments at Step 3

Comments of Brazil, India, Republic of Korea and the United States of America

Brazil

In regards to the aforementioned document Brazil would like to congratulate India and Argentina for the effort and to share some specific comments as follows:

ENGLISH

Specific comments:

Section and sentence/paragraph	Type of change
ANNEX I Table B. Physical Properties for Dried Spices and Culinary Herbs Footnote 3	Clarity, consistency/ Change
Rationale	
<p>For clarity and consistency with the decisions of the last Session of CCSCH we would like to propose the deletion of the last sentence of Footnote 3.</p> <p>The adoption of instruments for magnification beyond “correction of the naked eyes” maybe correlated with the use of microscope/microscopy and under the realm of CCFH.</p> <p>Those aspects were debated last Session of CCSCH (REP 17/SCH paragraph 14) in detail below:</p> <p>and that this section covered more than one parameter i.e. it covered live insects as well as dead insects, insect fragments and rodent contamination generally considered collectively as filth; and that these aspects and mammalian excreta could be included in Table 1 as defects; <i>and that only parameters measured by the naked eye apply.</i></p> <p>We would like to propose the removal of the last sentence of footnote 3 for better adoption of the proposed Standard.</p> <p>Limits and sampling methods for filth under infestation provisions (visible to the naked eyes) are far different from those limits for filth under microscopy provisions (visible with the aid of the microscope).</p> <p>Those differences need to be highlighted and differently addressed by the Committee for consistent inspection results. Mixing infestation and microscopy provisions altogether will impact both inspection services and trade, leading to variable and non reproducible results.</p>	
Proposed changes	
<p><u>Footnote 3</u> Dried Chilli or/and Paprika shall be free from living insects and shall be practically free from molds, dead insects, insect fragments and rodent contamination visible to the naked eye (corrected, if necessary, for abnormal vision) or with such magnification as may be necessary in any particular case.</p>	

SPANISH

En relación con el documento mencionado, Brasil desea felicitar a India y Argentina por el esfuerzo realizado y compartir algunos comentarios específicos:

Comentarios específicos:

Sección y frase / párrafo.	Tipo de cambio
ANEXO I B. Propiedades físicas para especias y hierbas culinarias secas Nota al pié de página nr 3	Aclaración, consistência/alteración
Razon	
<p>Para mayor claridad y coherencia con las decisiones de la última sesión de CCSCH, nos gustaría proponer la eliminación de la última oración de la nota 3.</p> <p>El uso de instrumentos para la ampliación más allá de “la corrección a simple vista” puede correlacionarse con el uso de microscopio / microscopía y en el ámbito de CCFH.</p> <p>Esos aspectos se debatieron en la última sesión de CCSCH (REP 17 / SCH párrafo 14) en detalle a continuación:</p> <p>Se observó que esta sección abarcaba más de un parámetro, es decir, que abarcaba insectos vivos, así como insectos muertos, fragmentos de insectos y contaminación de roedores generalmente considerados colectivamente como suciedad y que estos aspectos y excretas de mamíferos podrían incluirse en la Tabla 1 como defectos; <i>que sólo los parámetros medidos a simple vista se aplican</i>.</p> <p>Nos gustaría proponer que se elimine la última oración de la nota 3 para una mejor adopción de la Norma propuesta.</p> <p>Los límites y los métodos de muestreo para la suciedad bajo disposiciones de infestación (visibles a simple vista) son muy diferentes de los límites para la suciedad bajo disposiciones de microscopía (visibles con la ayuda del microscopio).</p> <p>Esas diferencias deben ser resaltadas y abordadas de manera diferente por el Comité para obtener resultados de inspección consistentes. La mezcla de las disposiciones de infestación y microscopía en su totalidad tendrá un impacto tanto en los servicios de inspección como en el comercio, dando lugar a resultados variables y no reproducibles.</p>	
Cambios propuestos	
<p><u>Nota al pié de página 3</u> El chile o el pimentón seco deben estar libres de insectos vivos y prácticamente libres de moho, insectos muertos, fragmentos de insectos y contaminación por roedores, visibles a simple vista (corregida, en caso de visión defectuosa) o con el aumento necesario para cada caso particular.</p>	

FRENCH

En ce qui concerne le document susmentionné, le Brésil voudrait féliciter l'Inde et l'Argentine pour leurs efforts et leur faire part de quelques observations spécifiques, formulées comme suit:

Commentaires spécifiques:

Section et phrase / paragraphe.	Type de changement
ANEXO I B. Propriétés physiques des épices séchées et des plantes culinaires note de bas de page nr 3	Clarté, cohérence / changement
Raisonnement	
<p>Par souci de clarté et de cohérence avec les décisions de la dernière session du CCSCH, nous souhaiterions proposer la suppression de la dernière phrase de la note de bas de page 3.</p>	

L'utilisation d'instruments pour un grossissement supérieur à "la correction de l'œil" ne peut être corrélée à l'utilisation de la microscopie / microscopie et sous le règne du CCFH.

Ces aspects ont été examinés lors de la dernière session du CCSCH (REP 17 / SCH, paragraphe 14) en détail ci-après:

Le Comité a noté que cette section couvre plus d'un paramètre, c'est-à-dire qu'elle couvre les insectes vivants ainsi que les insectes morts, les fragments d'insectes et la contamination par les rongeurs généralement considérés collectivement comme des saletés ; et que ces aspects et les excréments de mammifères pourraient être inclus dans le Tableau 1 comme des défauts que seuls les paramètres mesurés à l'œil nu s'appliquent,

Nous voudrions proposer la suppression de la dernière phrase de la note de bas de page 3 pour une meilleure adoption de la norme proposée.

Les limites et les méthodes d'échantillonnage pour les dispositions relatives à la crasse sous infestation (visibles à l'œil nu) sont très différentes de celles fixées pour les dispositions relatives à la crasse sous le microscope (visibles à l'aide d'un microscope).

Ces différences doivent être soulignées et traitées différemment par le Comité pour que les résultats des inspections soient cohérents. Le mélange des dispositions relatives à l'infestation et à la microscopie aura un impact sur les services d'inspection et le commerce, conduisant à des résultats variables et non reproductibles.

Changements proposés

note de bas de page 3 Le piment ou le paprika séchés doivent être exempts d'insectes vivants et pratiquement de moisissure, d'insectes morts, de fragments d'insectes et contamination par les rongeurs visibles à l'œil nu (vision corrigée, si nécessaire, pour une vision anormale) ~~ou avec un agrandissement nécessaire pour chaque cas particulier.~~

India

I. Paragraph 1, SCOPE

COMMENT: To also include the following species, viz. C. chinense, C. pubescens, C. annum var. annum, C. baccatum and C. pendulum in the scope.

II. Paragraph 2.2. STYLES, Note

COMMENT: To amend the statement under note, as below:

"Chilli Powder" is the term usually applied to a blend of ground capsicums and other spices mentioned in the scope, available as a homogeneous mix. ~~As a mixture of spices, "chilli powder" is outside the scope of this standard~~

III. ANNEX I

A. Chemical Properties for Dried Spices and Culinary Herbs

i) Color Value:

COMMENT:

- Chillies – There should be no specific requirement for colour.
- Paprika – We support the value, 80

ii) Total Ash %w/w (max)

For both Chilli and Paprika:

COMMENT: Total ash content for all classes - 10%

Rationale: Based on ISO values.

Republic of Korea

Dried chilli peppers and paprika" generally consume more than other culinary herbs and herbs with higher intakes require stricter standards. Especially, regarding the "Extraneous/Foreign matter" on the ANNEX Table B,

the maximum levels of dried chilli and paprika are lower than other products (1.0 % w/w) (the maximum levels of Oregano, dried ginger, dried garlic and nutmeg on their proposed draft standards are 0.5%).

Republic of Korea suggests that the specifications of dried chilli peppers and paprika should be the same as those of other group standards, or that a more rigorous standard should be established.

The United States of America

GENERAL COMMENTS:

The United States appreciates the efforts to further develop this proposed draft standard for Dried or Dehydrated Chilli and Paprika, however we are concerned that the Grouping format approved at the 3rd Session of the Codex Committee on Spices and Culinary Herbs (CCSCH) is not being used to facilitate the timely development and delivery of standards. The United States believes it is duplicative and a squander of resources to develop single standards that may eventually be transferred into the Grouping format only after their completion.

The United States would like to remind the committee that this draft standard, similar to all other draft standards approved as new work for CCSCCH at by the 2017 Codex Alimentarius Commission, were approved with the notion that the drafts would be developed with the grouping format in mind; not as stand-alone standards. The committee must recognize that some stakeholders (the trade industry and some countries) are no longer willing to wait between four and six years for the development of a single standard to address current concerns. For this reason, many are turning to other more efficient private, national, or regional organizations to develop new standards. The CCSCCH output must be science-based and of timely relevance to its stakeholders.

We will continue to promote that further versions of this draft standards follow the grouping format, however in the meanwhile, we provide the following specific comments below.

SPECIFIC COMMENTS:

The United States comments on the Proposed Draft Standard for Dried or Dehydrated Chilli and Paprika at Step 3, follow the sequence of the draft standard.

2.1 PRODUCT DEFINITION

2.1.1 Dried or dehydrated form of Chilli and Paprika can be dried pods (fruits) of plants *Capsicum .annuum* and *C. frutescens* L.

Issue and Rationale: Section 2.1.1 is confusing and states that “Dried or dehydrated form of Chili and Dried Paprika can be dried pods (fruits) ...”

Proposal: The United States recommends modifying it to say:

“Dried or dehydrated form of Chilli and Dried Paprika is the product obtained from drying the fruits without stems and with or without seeds.”

2.2 Styles

Issue and Rationale: Combining “Whole/Cracked/Broken” in one indent is not consistent with the standard layout or the way the product is traded.

Proposal: The United States recommends separating the “Whole” style from “cracked” and “broken” as follows:

2.2 Styles

Chilli and paprika may be

- **Whole**
- **Cracked/broken**
- **Ground**

Cracked/broken and ground chillies and paprika are obtained by grinding whole chillies and paprika respectively, with or without seeds. No other extraneous or foreign matter is allowed.

The particle size of ground chili and paprika is based on the agreement between the trading parties concerned.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

Issue and Rationale: Due to the economic and negative health risk of economic adulteration of spices and culinary herbs, the United States believes that the standard should be very clear in stating that economic adulteration is not acceptable, and therefore the following wording is proposed for a new sub-section:

Proposal: 3.2._ Adulteration

Dried culinary herbs shall be free from any economic adulteration.

3.2.3 Classification

Issue and Rationale: The classification of Dried or Dehydrated Chilli and Paprika into three classes is not practiced universally. Therefore, it is imperative that the standard incorporate both existing trade practices (with classification and without classification).

Proposal: The United States recommends the following revised text of this section:

Dried or Dehydrated Chilli and Paprika may be classified in three classes/grades according physical and chemical requirements as specified in Table 2 and 3, respectively.

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

When Dried chilli/paprika is unclassified/ungraded, the provisions for Class/Grade II requirements apply as the minimum requirements.

4. Food Additives

Proposal: The United States suggests modifying the text to say the following:

The anticaking agents listed in Table 3 of the *General Standard for Food Additives (CXS 195 -1995)* may be permitted for use in ground/powdered chilli or/and paprika only in amounts appropriate to the task.

9. Methods of Analysis

Proposal: The United States submits the following method for inclusion in the methods analysis table:

Volatile Oil	ISO 6571:2008 Alternative: AOAC 962.17 ASTA 5.0	Distillation
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Chemical Physical Characteristics

Issue and Rationale: In the United States, Dried Chilli peppers and Dried Paprika are not classified, therefore the following comments and proposals on chemical and physical requirements are based on the position of an absolute minimum requirement per style, which we consider as the Class II level. The values for the characteristics in both tables are those currently applied by trade and regulatory agencies, as well as food safety practices, including defect action levels.

Proposal:

Table 1: Chemical Requirements

Product	Form	Moisture Content (Max. %)	Ash %w/w max	Ash insoluble % w/w max	Volatile Oils mL/100g (minimum)	Non-volatile ether extract %w/w	Crude fibre % by mass	Other Properties		
								Name/ value	Name/ value	Name/ value
¹ Chili Peppers	Whole	12	10	1.6			28	Capsaicin content, µg/g Min. 30	Scoville µg/g x 15 Min. 450	Color Value Color Units Min 60
	Pieces	12	10	3		25.0	30			
	Ground/powder	12	10	3		25.0	30			
Paprika	Whole	12	10	1.6			28	Capsaicin content, µg/g Max. 30	Scoville µg/g x 15 Max. 450	Color Value Color Units Min. 60
	Pieces	12	10	3		25.0	30			
	Ground/powder	12	10	3		25.0	30			

¹ Some commercial types of dried whole chili peppers have specific moisture contents e.g. Ancho Mulato @12.5%; Guajillo Pasilla @13.5%

Table 2: Physical Requirements

Product General name	Form	Extraneous Matter % w/w max	Foreign Matter % w/w max	Whole dead insects, Count/100 gm	Insect fragments pieces/ # gm	Rodent filth maximum number of pieces / gm	Mold damaged % w/w max	Mammalian Excreta mg/Kg max	Other excreta mg/Kg max	Other Requirements
										Name/ Limit
Chili Peppers	Whole	1.0	1.0	4	1.0		3.0	2.2	17.6	- Unripe fruits 2.0% - Blemishes & deformations 4.0% by wght. - Broken fruits, seeds and fragments 2.0 % by wght. - Offsize ± size marked 10.0%
	Pieces	1.0	1.0		50/25gm	6/25gm	3.0 includes insect infested and/or moldy			
	Ground/ Powdered	1.0	1.0		50/25gm	6/25gm				
Paprika	Whole	1.0	1.0	4			3 includes insect infested and/or moldy			- Unripe fruits 2.0% - Blemishes & deformations 4.0% by wght. - Broken fruits, seeds and fragments 2.0 % by wght - Offsize ± size marked 10.0%
	Pieces	1.0	1.0		75/25 gm	11/25gm				
	Ground/ powdered	1.0	1.0		75/25 gm	11 /25gm	20 ²	2.2	17.6	

² mold filaments can be observed in 20% of the fields examined using a Howard mold count (HMC) slide and observed microscopically (AOAC 984.29).

