



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

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DRAFT STANDARD FOR DRIED SMALL CARDAMOM (CX/SCH 24/7/3)

(Comments of the European Union, India, Indonesia, Kenya, Nigeria, Thailand, Uganda, and the United Republic of Tanzania)

The European Union

The European Union and its Member States (EUMS) would like to thank to the Electronic Working Group chaired by India and co-chaired by Guatemala and the Islamic republic of Iran for updating the draft **Standard for dried small cardamom**.

The EUMS would like to submit the following comments:

PARAGRAPH	COMMENTS
2.1 Product definition	It is suggested to use the following: “ Small Green cardamom”. The common and trade name of the spice is "Cardamom" or "Green Cardamom" - to make a difference with "Black Cardamom" (<i>Amomum</i> spp.) that is another spice, out of the scope of this standard.
2.2 Styles	The following amendments should be considered: <ul style="list-style-type: none"> - Seeds (seed obtained after opening of the pods from the capsules); - Ground/powdered seeds (obtained by grinding and dried the seeds only, after separation from the capsules)
8.1	Editorial comment: The first sentence should be presented without indicating “8.1”: 8.1 “The products covered by the provisions of this Standard shall be labelled in accordance with the General Standard for the <i>Labelling of Prepackaged Foods</i> (CXS 1-1985).” This is a sentence that ends in colon and is followed by sub-bullet points, that need to be renumbered accordingly, i.e.: 8.1 Name of product, 8.2 Country of origin, 8.3 Labelling (...).
8.3	The heading should be as follows: “ Country of origin and country of harvest ” instead of “ Country of origin/country of harvest ” – in accordance with the provisions of the “Template for SCH standard”. Having the slash could lead to confusion.
Annex I Table 1. Chemical characteristics	We suggest the following changes: <ul style="list-style-type: none"> - The values of “Total ash” column should be changed to 9.5% for all whole/powdered products and all values of “Acid insoluble ash” column to 3%. Rationale: The values of total ash and acid insoluble ash should be the same in both whole and powdered forms, as grinding neither add nor remove mineral elements. The proposed value of total ash would be consistent with ISO 882 Standard (which gives such a value for whole capsules and seeds), and the proposed value of acid insoluble ash would be approximated to the European Spice Association (ESA) value - that is 2.5 % w/w max. on wet basis, taking into account a maximum acceptable moisture for this spice given in ISO 882 Standard i.e. 13 % w/w”. - The proposed moisture and volatile oil values are consistent as grinding can lead to a drop in humidity and lower spice quality.

	<ul style="list-style-type: none"> - Volatile oil: it is suggested to have 2% for powdered capsules and powdered seeds. There is no need to mention a different value for steam treated seeds. - It might be considered adding a note saying that the volatile oil values are related to natural spice, not heat treated or subjected to other processes that may reduce the natural content of volatile oil (this note should be included in all the standards as a generic remark).
Table 2. Physical characteristics	<ul style="list-style-type: none"> - The last 5 columns related to light filth test should be removed and replaced by generic sentence: e.g., <u>Insects (live & dead) and mammalian excreta & hair, visible to the naked eye should aim to be zero.</u> - The values indicated are those proposed by ISO 882 for the lower cardamom grades in each category. This relates to the discussion on different grades. It is suggested to insert a footnote to indicate that these values relate to lower cardamom grade. - Including definitions as a footnote for the parameters: “Empty and malformed capsules”, “Immature and shrivelled capsules” and “Light seeds” should be considered. The ISO 882-1 and 882-2 definitions could be used: <ul style="list-style-type: none"> o Empty and malformed capsules: Capsules which have no seeds or are scantily filled with seeds. o Immature and shrivelled capsules: Capsules which are not fully developed”. o Light seeds include seeds that are brown or red in colour, and broken, immature and shrivelled seeds. [...]”. - It should be considered to add a note clarifying “Insect defiled/infested” like in ISO 882-1: “<i>Thrip marks alone on cardamom capsules should not lead to the conclusion that the capsules have been infested with insects</i>”. This would be consistent with the ISO standard.
Table of method of analysis	<ul style="list-style-type: none"> - Regarding the parameter “empty and malformed capsules”, instead of IS 1907:1984, the ISO 882-1 should be followed, which says: “The proportion of empty and malformed capsules shall be not more than 5% by count”. This ISO standard is globally recognised, and its application seems appropriate. Furthermore, it would be also consistent with the physical characteristics described in table 2. Its third column (for “Empty and malformed capsules”) mentions “by count/100 capsules” and the limit provided is 5.

India

2.2 Styles

India proposes deletion of “opened capsule” from styles.

Table 1. Chemical characteristics of dried small cardamom

India supports the value of 9.5% and 10% for total ash on dry basis % w/w (max.) for seeds and Powdered Capsules with seeds respectively.

Indonesia

Section: style.

In relation with style of cardamom, Indonesia proposes to delete opened capsules to the whole style. The seed of cardamom in opened capsule form may result in partial, if not complete loss of its seed leading to failure in meeting its quality parameter. In addition, opened capsule form may be processed into the seed which is covered as an alternative style in this standard.

Kenya

Comment on Scope: Kenya proposes addition of “human” to the scope to read: This standard applies to plant products in their dried form as spices, defined in Section 2.1 below, offered for direct **human**

consumption, as an ingredient in food processing, or for repackaging if required. It excludes the product for industrial processing.

Justification: To align to other SCH Standards.

Comment on Styles:

1. Kenya supports the removal of square brackets on Styles, as this makes the draft standard inclusive of all the existing styles of cardamom in the market.
2. On 2.2. Kenya also proposes to split the last bullet on styles of small, dried cardamom to read;
 - ✓ Ground /powdered seeds (obtained by grinding dried seeds only)
 - ✓ Ground/powdered whole capsules (obtained by grinding dried whole capsules including seeds)

Justification: To make the four styles of small cardamom clear.

Comments on Annex 1, Table 1

Comments on:

1. Total Ash:

- a) Kenya supports the adoption of total Ash content on a dry weight basis % w/w max of 9.5 on Small Cardamom Seeds

Justification: to align to the reference value in ISO 882-2

- b) Powdered capsule with seed: Kenya supports the adoption of total Ash content on a dry weight basis % w/w max of 10.

Justification: To align with the requirements of the Kenyan national standards.

- c) Kenya supports the proposed limit of 12% w/w (max) Moisture content for Powdered Capsules with seeds.

Justification: The proposed limit of 12% w/w (max) is considered a safe limit for most powdered spices.

Comments on Annex 1, Table 2

Generally, Kenya notes that most of the parameters in this table are indicated as N/A and therefore will not necessarily serve the purpose of facilitating trade except for the whole small cardamom style.

Nigeria

2.2 Styles

Bullet 1:

Nigeria supports deletion of “[opened capsule]” on square bracket as a form of style.

Rationale:

Once the capsules are opened there will be loss of seed content, wholeness no longer guaranteed and lowers the quality, this makes the product of very low quality and with a very little value. Some of the grains within the capsule/pod may fall off which will enable short changing customers.

“Opened capsule” could fall under the other styles which should be distinctly labelled as specified in the last statement of the clause. Also, industry deals in whole capsules.

Bullet 3

Nigeria agrees with the provision “Ground/Powdered Seeds (obtained by grinding dried seeds only) and/or whole capsules powder (obtained by grinding dried whole capsule including seeds) supports the removal of square brackets.

Rationale

The whole capsule powder is one of the small cardamom styles which are traded globally.

Table 1. Chemical Characteristics for dried small Cardamom

Nigeria support removal of square bracket on the provision for “Acid insoluble ash on dry basis %” for powdered Capsules with seeds.

Rationale

This are values people looked at when purchasing Cardamom

Table 2. Physical characteristics for dried small Cardamom

Nigeria support removal of all square brackets with respect to the provision for “Whole Dead insects, (by count)” “Mammalian Excreta” “Other Excreta,” “Mould Visible” for the Powdered seeds.

Rationale

Good Manufacturing Practice, Good Hygiene Practice and Good Safety Practice should have taken care of the presence of those physical impurities on the previous forms hence not applicable to the powdered seeds which are usually well packaged.

8.3.2 Country of harvest

Nigeria proposes the deletion of “Optional” from the provision for Labelling relating Country of Harvest.

Rationale

The origin of the product may be different from the Country of Harvest and it is therefore important for traceability.

8.3.3 Region of harvest and year of harvest.

Nigeria proposes the deletion of “Region of harvest” from the Labelling provision. However, year of harvest should be mandatory.

Rationale

The country origin if declared as required in 8.3.2 is sufficient to reflect the region. While declaration of year of harvest reflects the quality and freshness of the products.

Thailand

1. In general, Thailand has no objection on the proposed documents. However, we do consider that the format of the proposed draft standards should be in accordance with the SCH standard template and the consistency with other existing standards should be concerned, particularly, a section scope, section 3.1 Composition and the term used for all parameters in the table on physical and chemical characteristics.

2. For the section on chemical characteristics, we would like to request the working group to reduce the parameters to minimum to be less burden of inspection expenses. For example, if good hygiene practices are in place and the testing of extraneous/foreign matter is specified, it may not be necessary to test the total ash or acid insoluble ash.

3. For the table on physical and chemical characteristics, the units for all parameters should be specified as SI units.

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

1. We would like to propose to move the opened capsule for whole style to be an another factor in the table on physical characteristics and its minimum percentage of tolerance is required.
2. For ground/powdered seed by whole capsule or only seeds, we would like to ask for the quality differences between the two types. If there are clear quality differences, it can be separated into an another style. Moreover, the mandatory on specifying the style on a label should be concerned when the ground/powdered style could be obtained from both whole capsule and only seeds. This is to provide more information to consumers.

Uganda

Uganda appreciates the work done by the chairpersons and co-chairpersons of the EWG who worked on the Draft Standard for dried small cardamom.

Uganda deliberated on the Draft Standard for dried small cardamom and generated the following comments:

1. Under clause 2.2, Uganda recommends that the style on open capsules in the square brackets be deleted and maintains only the whole closed capsules.

Justification:

The flavours of small cardamom are mainly dependent on the seeds thus having whole open capsules will lead to lose of the seeds thus the flavours.

In this regard, the square brackets should not be opened.

2. For the ground powdered seeds, Uganda recommends separating the “ground\powdered seeds” from “ground\powdered whole capsules” to create two separate styles. Therefore, the need to open up the square brackets.

Justification:

These are two different styles of presentation where one only contains seeds while the other contains the whole capsule. Thus, the square brackets need be opened up.

In addition, in Table 1, these two styles have been separated into two different styles.

3. Uganda recommends that the square brackets in tables 1 and 2 are opened up. In addition, Uganda recommends the parameters for whole and seeds have the same parameters.

the United Republic of Tanzania

The United Republic of Tanzania appreciates the opportunity to provide comments on different agenda items to be discussed by the 7th Session of the Codex Committee on Spices and Culinary Herbs.

COMMENT

2.2 The URT proposed the use of opened capsule as among the style

JUSTIFICATION

The opened capsule cardamom exist in the market and it is considered as effect of curing process. Further to that the provision creates the grading style of the product as an agreement between buyer and seller across the Globe.

COMMENT

2.2. The URT Propose inclusion of the term [whole capsules powder] And rephrasing the provided definition for clarity to read “Ground/Powdered Small cardamom obtained by grinding dried seeds only and/ or dried whole capsule including seeds”.

JUSTIFICATION

Whole capsule powder is among the most traded styles/ forms for cardamom hence standardization of this form of product is necessary to be featured in the standard.

ANNEX 1, TABLE 1

COMMENT

The URT proposed change of numbering for Table 1.

JUSTIFICATION

Table 1 which is named as “Chemical Characteristics for dried small Cardamom” should be named as Table 2 since Table 1 for this standard is named for “Common, trade and scientific name of dried small cardamom”

COMMENT

The URT supports the proposal of 8.0% w/w (max) of Total ash for seeds.

JUSTIFICATION

The URT is in favour of reducing the limit since we expect lower total ash value in seeds than in whole capsule as provided for in the Table. Moreover, the data from Tanzania indicate a range of 5-7 % w/w from whole capsule which substantiate the reduction.

COMMENT

The URT proposed the limit of 9.5% w/w (max) of Total ash for Powdered Cap-sules with seeds. Furthermore, URT propose to introduce the provision on particle size to read "The particle size of ground/powdered style is determined by contractual agreement between buyer and seller."

JUSTIFICATION

We don't expect the total ash limit to exceed that of whole unless there is adulteration.

COMMENT

The URT supports the proposed limit of 2.5% w/w (max) Acid insoluble ash for Powdered Cap-sules with seeds.

JUSTIFICATION

The URT accepts the limit as suggested because we don't expect the acid insoluble ash limit to exceed that of whole and based on the consumption pattern of the spice also the limits provided is still safe.

COMMENT

The URT supports the proposed limit of 12% w/w (max) Moisture content for Powdered Cap-sules with seeds.

JUSTIFICATION

The proposed limit of 12% is considered as safe limit for most powdered spices.

COMMENT

The URT supports the proposed limit of 2.7ml/100g as minimum value of Volatile oil in Powdered Cap-sules with seeds.

JUSTIFICATION

The suggested limit is acceptable since we expect decrease of volatile oil due to evaporation during grinding.