

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 3.1, 4.1

SCH08/CRD27

Original Language Only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON SPICES AND CULINARY HERBS Eighth Session COMMENTS OF INDONESIA

The Government of Indonesia would like to submit the following comments:

Indonesia would like to congratulate CCSC for the excellent work of this session. Moreover, Indonesia would like to make some comments for some relevant agenda items to be further discussed and considered by the Committee.

### Agenda Item 3. Draft standard for spices in the form of dried fruits and berries

#### 3.1 Proposed Draft standard for vanilla (at Step 6/7)

Draft Standard	Indonesia Comment
<b>2.2 Styles</b> Dried or dehydrated vanilla may be: <ul style="list-style-type: none"> <li>- whole beans or complete beans with seeds and pulp inside;</li> <li>- splits – beans that are naturally split;</li> <li>- cut – short vanilla beans of varying lengths;</li> <li>- vanilla c or [vanilla-caviar] [Vanilla Supreme] – comprising of vanilla pulp and seeds; or</li> <li>- [ground/powdered – derived from ground whole, cut, and split beans;]</li> <li>- [ground – derived from whole, cut, and split beans – may or may not be free-flowing;]</li> </ul> <b>and/or?</b> <ul style="list-style-type: none"> <li>- [powdered – derived from whole, cut, and split beans – in free-flowing form].</li> <li>- Other styles distinctly different for those [five or six] are allowed, provided they are labeled accordingly.</li> </ul>	In relation to section 2.2, Indonesia proposes as follows: <ol style="list-style-type: none"> <li>1. Regarding styles for Vanilla, Indonesia agrees with the term “<i>Vanilla pulp and seeds</i>”, as it more clearly and appropriately describes the actual condition of Vanilla styles. Indonesia proposes not to use the term “vanilla caviar” because it may cause confusion, as it is commonly associated with fish eggs.</li> <li>2. Indonesia also supports separating the styles ‘ground’ and ‘powder’. Furthermore, it is necessary to clarify the definition and distinction between ‘ground’ and ‘powder’.</li> </ol>
<b>4.FOOD ADDITIVES</b> [Anticaking agents listed in Table 3 of the <i>General standard for food additives</i> (CXS 192-1995) are acceptable for use in ground/powdered form of product conforming to this standard.]	Indonesia endorses the inclusion of an open square bracket, resulting in the revised sentence: “ <i>Anticaking agents listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in ground/powdered form of product conforming to this standard.</i> ”
8.1.3 Trade name, species, or cultivar may [shall] be listed on the label.	In relation to section 8.1.3, Indonesia supports the use of the term ‘shall’ in trade name and species, while cultivar is not mandatory, so it reads: “ <i>Trade name and species shall be listed on the label. Cultivar may be listed on the label</i> ”
8.2.2 Country of harvest (optional) [mandatory]	In relation to section 8.2.2, Indonesia is awaiting the results of CCFL49.
<b>Annex 1</b> <b>Chemical and physical characteristics and</b>	In relation to section Table A1, Indonesia proposes as follows:

<b>methods of analysis for vanilla</b>	<div><div><div>1. Regarding chemical characteristics, Indonesia supports option 2.</div><div>2. In accordance with the mandate of the Codex for CCSCH, which</div></div><div>pertains to standards for spices and culinary herbs in their dried and dehydrated state, as well as in alignment with other draft</div></div>
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Draft Standard				Indonesia Comment																																																			
<p><b>[Option 1.] Table A1. Chemical characteristics of Vanilla per style</b></p> <table><tr><th>Product Name</th><th>Form/Style</th><th>Moisture content %w/w [(max)]</th><th>Vanillin Content on wet basis g/100g (min)</th></tr><tr><td rowspan="5">Vanilla</td><td>Whole</td><td>25 – 38</td><td>≥2.0</td></tr><tr><td>Split</td><td>30</td><td></td></tr><tr><td>Cut</td><td>30</td><td>1.6 – 2.0</td></tr><tr><td>Vanilla-caviar</td><td>35</td><td>≥ 2.0</td></tr><tr><td>Ground/powdered</td><td>25</td><td>≥1.0</td></tr></table>				Product Name	Form/Style	Moisture content %w/w [(max)]	Vanillin Content on wet basis g/100g (min)	Vanilla	Whole	25 – 38	≥2.0	Split	30		Cut	30	1.6 – 2.0	Vanilla-caviar	35	≥ 2.0	Ground/powdered	25	≥1.0	<p>standards under CCSCH, Indonesia proposes the inclusion of parameters for testing vanillin content on a dry basis (instead of a wet basis). Futhermore, if vanillin content is in wet basis, Indonesia propose vanillin on wet basis:</p> <ul style="list-style-type: none"><li>○ Whole:Extra = 1,2 % w/w</li><li>○ Whole: I = 1,1 % w/w</li><li>○ Whole: II = 1,1 % w/w</li><li>○ Whole: III = 1,0 % w/w</li><li>○ Split = 1,0 % w/w</li><li>○ Cut = 0,8 % w/w</li></ul> <p>In line with the proposal above, Indonesia does not support the use of the term ‘vanilla-caviar’ and recommends that it be replaced with ‘vanilla pulp and seeds’. However, if the term of ‘vanilla-caviar’ is approved, Indonesia proposes that the vanillin content on a wet basis for the “vanilla caviar” style be set at 0.7 % w/w.</p> <p>Indonesia also proposes that the term “Ground/Powder” be separated into two distinct styles, in accordance with trade practices.</p> <p>Therefore, Indonesia’s input is presented in the table below:</p>																															
Product Name	Form/Style	Moisture content %w/w [(max)]	Vanillin Content on wet basis g/100g (min)																																																				
Vanilla	Whole	25 – 38	≥2.0																																																				
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	Vanilla-caviar	35	≥ 2.0																																																				
	Ground/powdered	25	≥1.0																																																				
<p><b>[Option 2.] Table A1. Chemical characteristics for vanilla per species</b></p>																																																							
<table><tr><th rowspan="2">Scientific Name</th><th rowspan="2">Form/ Style</th><th rowspan="2">Moisture content %w/w</th><th rowspan="2">Vanillin content on a wet basis [weight] g/100g (min)</th><th colspan="3">Indonesia's proposal</th></tr><tr><th>Vanillin content on wet basis %w/w</th><th>Test Result</th><th>HPLC</th></tr><tr><td rowspan="3">Vanilla planifolia</td><td>Whole: Extra</td><td>35 - 38</td><td>1.8</td><td>1,2</td><td>2,97</td><td>1,48</td></tr><tr><td>Whole: I</td><td>30 - 36</td><td>1.6</td><td>1,1</td><td></td><td></td></tr><tr><td>Whole: II</td><td>25 - 30</td><td>1.4</td><td>1,1</td><td></td><td></td></tr></table>				Scientific Name	Form/ Style	Moisture content %w/w	Vanillin content on a wet basis [weight] g/100g (min)	Indonesia's proposal			Vanillin content on wet basis %w/w	Test Result	HPLC	Vanilla planifolia	Whole: Extra	35 - 38	1.8	1,2	2,97	1,48	Whole: I	30 - 36	1.6	1,1			Whole: II	25 - 30	1.4	1,1			<table><tr><th></th><th>Scientific Name</th><th>Form/ Style</th><th>Moisture content %w/w</th><th>Vanillin content on a wet basis [weight] g/100g (min)</th></tr><tr><td rowspan="4"></td><td rowspan="4">Vanilla planifolia</td><td>Whole: Extra</td><td>35 - 38</td><td>1.8 [1,2]</td></tr><tr><td>Whole: I</td><td>30 - 36</td><td>1.6 [1,1]</td></tr><tr><td>Whole: II</td><td>25 - 30</td><td>1.4</td></tr><tr><td></td><td></td><td></td></tr></table>					Scientific Name	Form/ Style	Moisture content %w/w	Vanillin content on a wet basis [weight] g/100g (min)		Vanilla planifolia	Whole: Extra	35 - 38	1.8 [1,2]	Whole: I	30 - 36	1.6 [1,1]	Whole: II	25 - 30	1.4			
Scientific Name	Form/ Style	Moisture content %w/w	Vanillin content on a wet basis [weight] g/100g (min)					Indonesia's proposal																																															
				Vanillin content on wet basis %w/w	Test Result	HPLC																																																	
Vanilla planifolia	Whole: Extra	35 - 38	1.8	1,2	2,97	1,48																																																	
	Whole: I	30 - 36	1.6	1,1																																																			
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	Vanilla planifolia	Whole: Extra	35 - 38	1.8 [1,2]																																																			
		Whole: I	30 - 36	1.6 [1,1]																																																			
		Whole: II	25 - 30	1.4																																																			

Draft Standard							Indonesia Comment				
	Whole: III	15 - 25	1.2	1,0							[1,1]
	Split	15 - 25	1.2	1,0					Whole: III	15 - 25	1.2 [1,0]
	Cut	10-25	1	0,8	1,62	0,88			Split	15 - 25	1.2 [1,0]
	Ground/ powdered	<15	1	0,9	0,8	0,43			Cut	10-25	1 [0,8]
	Vanilla-caviar	25 - 35	1	0,7	2,37	0,04			Ground		
<i>Vanilla odorata</i>	Whole	15 - 35	2						Powdered		
	Split	15 - 25	2						Vanilla-caviar	25 - 35	1 [0,7]
	Cut	15-20	1.4						Whole	15 - 35	2
	Ground/ powdered	<15	1.4						Split	15 - 25	2
	Vanilla-caviar	25 - 30	1						Cut	15-20	1.4
<i>Vanilla x tahitensis</i>	Whole	30 - 55	0.3				<i>Vanilla odorata</i>	Ground/ powdered	<15	1.4	
	Cut	15 - 55	0.3					Vanilla-caviar	25 - 30	1	
	Ground/powdered	10 - 45	0.3					Whole	30 - 55	0.3	
	Vanilla-caviar	15 - 55	0.3					Cut	15 - 55	0.3	
<i>Vanilla cribbiana</i>	Whole	15 - 38	1.4				<i>Vanilla x tahitensis</i>	Ground/powder	10 - 45	0.3	
	Split	15 - 25	1.4					Vanilla-caviar	15 - 55	0.3	
	Cut	10 - 25	0.7					Whole	15 - 38	1.4	
	Ground/ powdered	<15	0.5					Split	15 - 25	1.4	
		Vanilla-caviar	25 - 35	1				Vanilla cribbiana	Cut	10 - 25	0.7
								Ground/	<15	0.5	

Draft Standard							Indonesia Comment			
Vanilla pompona	Whole	20 - 40	0.02					powdered		
	Cut	15 - 25	0.02					Vanilla-caviar	25 - 35	1
	Ground/ powdered	<15	0.01					Whole	20 - 40	0.02
	Vanilla-caviar]	25 - 35	0.02					Cut	15 - 25	0.02
								Ground/ powdered	<15	0.01
								Vanilla-caviar]	25 - 35	0.02

[OPTION 3 – Table A1. A new proposal for the Committee's consideration from the EWG].

Product Name	Form/Style	Moisture content %w/w [(max)]	Vanillin content on wet basis [dry] g/1
Vanilla	Whole	15–40*	1.2**–2.0
	Split	15–30	1.2–2.0
	Cut	10–30***	1.2–2.0
	Ground	15–45	0.01–1.8
	Powdered	14	0.01–1.8
	Vanilla-caviar	25–35	1.0–2.0

Notes:  
\* Except for *Vanilla x tahitensis* when stated with a max. of 55  
\*\* Except for *Vanilla x tahitensis* when stated with a min. of 0.3 and *Vanilla pompona* with a min of 0.02  
\*\*\* Except for *Vanilla x tahitensis* when stated at 55

## Agenda Item 4. Draft standard for spices in the form of dried barks

### 4.1 Proposed Draft standard for cinnamon (at Step 3)

Draft Standard	Indonesia Comment
<p><b>1. Scope</b></p> <p>This standard applies to dried or dehydrated bark - cinnamon as 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.</p>	<p>Indonesia would like to seek confirmation regarding the type of template being used in the development of this standard—whether it is based on a <b>group standard template</b> or an <b>individual standard template</b>.</p> <p>This clarification is necessary due to the <b>some differences observed</b> between the current draft and the standard template for Spices and Culinary Herbs (SCH), as outlined in document <b>CX/SCH 25/8/10</b>.</p> <p>If the template used in the drafting of this standard is derived from the standard group template, then the wording as found in document CX/SCH 25/8/10 may be applied:</p> <p>“This standard applies to spices or culinary herbs derived from dried or dehydrated {name of the group} as defined in Section 2.1 below, offered for direct human consumption, or as a food processing ingredient or for repackaging if required. The exact species bought/sold may be defined by contractual specifications. This standard does not apply to these products when intended for industrial processing”.</p> <p>In follow-up to the above, for Point 1. Scope, the appropriate wording is:</p> <p>“This standard applies to spices or culinary herbs derived from dried or dehydrated <b>Bark of Cinnamon</b> as defined in Section 2.1 below, offered for direct human consumption, or as a food processing ingredient or for repackaging if required. The exact species bought/sold may be defined by contractual specifications. This standard does not apply to these products”. when intended for industrial processing”.</p> <p><b>Justification:</b> Compliance with Required Template as found in document CX/SCH 25/8/10</p>

Draft Standard	Indonesia Comment																					
<p><b>2.1. Product definition</b></p> <p>Cinnamon is a product obtained from the [peeled or unpeeled] dried or dehydrated bark belonging to the species listed in Table 1.</p> <p><b>[Option 1: Table 1: Species of cinnamon covered by this standard]</b></p> <table><tr><th>Common name</th><th>Trade name/s</th><th>Scientific name</th></tr><tr><td>Chinese cinnamon [Cinnamon]</td><td>Chinese cassia</td><td><i>Cinnamomum cassia</i> (Syn.: <i>Cinnamomum aromaticum</i>)</td></tr><tr><td>[Ceylon cinnamon (Sri Lankan type, Seychelles type, Indian type and Madagascar type)] [Cinnamon]</td><td>[True cinnamon]</td><td>[<i>Cinnamomum zeylanicum</i> Syn.: <i>Cinnamomum verum</i>]</td></tr><tr><td>[Sri Lanka cinnamon] [Cinnamon]</td><td>[Ceylon cinnamon]</td><td>[<i>Cinnamomum zeylanicum</i>]</td></tr><tr><td>[Seychelles cinnamon, Madagascar cinnamon and Indian cinnamon] [Cinnamon]</td><td>[Cinnamon]</td><td>[<i>Cinnamomum verum</i>]</td></tr><tr><td>Indonesian cinnamon [Cinnamon]</td><td>Koerintje, Indonesia Burmani [Indonesian cinnamon]</td><td><i>Cinnamomum burmannii</i></td></tr><tr><td>Vietnamese cinnamon</td><td>Saigon cassia</td><td><i>Cinnamomum loureirii</i></td></tr></table>	Common name	Trade name/s	Scientific name	Chinese cinnamon [Cinnamon]	Chinese cassia	<i>Cinnamomum cassia</i> (Syn.: <i>Cinnamomum aromaticum</i> )	[Ceylon cinnamon (Sri Lankan type, Seychelles type, Indian type and Madagascar type)] [Cinnamon]	[True cinnamon]	[ <i>Cinnamomum zeylanicum</i> Syn.: <i>Cinnamomum verum</i> ]	[Sri Lanka cinnamon] [Cinnamon]	[Ceylon cinnamon]	[ <i>Cinnamomum zeylanicum</i> ]	[Seychelles cinnamon, Madagascar cinnamon and Indian cinnamon] [Cinnamon]	[Cinnamon]	[ <i>Cinnamomum verum</i> ]	Indonesian cinnamon [Cinnamon]	Koerintje, Indonesia Burmani [Indonesian cinnamon]	<i>Cinnamomum burmannii</i>	Vietnamese cinnamon	Saigon cassia	<i>Cinnamomum loureirii</i>	<p>Indonesia would like to submit the following comments and proposals regarding Section 2.1 – Product Definition:</p> <ol style="list-style-type: none"><li>1. Designation of SCH Name Based on the product definition template, it is confirmed that the Name of SCH in the group is “Dried or Dehydrated Bark of Cinnamon.” In accordance with the convention outlined in the standard template (CX/SCH 25/8/10), the term "{Name of SCH}" refers to the common name of the Spices and Culinary Herbs (SCH) covered by the standard.</li><li>2. Use of Table 1 – Option 1 Indonesia notes that Option 1, Table 1 is consistent with the format and structure prescribed in the updated standard template (CX/SCH 25/8/10). Accordingly, Indonesia maintains its position to adopt Option 1 as the table to be used in this standard.</li><li>3. Common Name Convention Referring to the guidance in CX/SCH 25/8/10, Indonesia supports the use of the common name in one of the following forms:<ul style="list-style-type: none"><li>• As a single term: Cinnamon (Name of SCH), or</li><li>• As a popularly known name, such as:<ul style="list-style-type: none"><li>- Chinese Cinnamon</li><li>- Sri Lankan Cinnamon</li><li>- Indian Cinnamon</li><li>- Indonesian Cinnamon</li><li>- Vietnamese Cinnamon</li></ul></li></ul></li></ol> <p>This approach ensures clarity and flexibility in identifying the product across different markets and labeling practices.</p>
Common name	Trade name/s	Scientific name																				
Chinese cinnamon [Cinnamon]	Chinese cassia	<i>Cinnamomum cassia</i> (Syn.: <i>Cinnamomum aromaticum</i> )																				
[Ceylon cinnamon (Sri Lankan type, Seychelles type, Indian type and Madagascar type)] [Cinnamon]	[True cinnamon]	[ <i>Cinnamomum zeylanicum</i> Syn.: <i>Cinnamomum verum</i> ]																				
[Sri Lanka cinnamon] [Cinnamon]	[Ceylon cinnamon]	[ <i>Cinnamomum zeylanicum</i> ]																				
[Seychelles cinnamon, Madagascar cinnamon and Indian cinnamon] [Cinnamon]	[Cinnamon]	[ <i>Cinnamomum verum</i> ]																				
Indonesian cinnamon [Cinnamon]	Koerintje, Indonesia Burmani [Indonesian cinnamon]	<i>Cinnamomum burmannii</i>																				
Vietnamese cinnamon	Saigon cassia	<i>Cinnamomum loureirii</i>																				

Draft Standard				Indonesia Comment																					
<div>[Cinnamon]</div> <div><b>[Option 2: Table 1: Species of cinnamon covered by this standard]</b> <i>This option with a new format reflects the discussions about the content of Option 1, as presented by the co-chair Mexico</i></div> <table><tr><th>Product</th><th>Common name</th><th>Trade name/type</th><th>Scientific name</th></tr><tr><td rowspan="9">CINNAMMON</td><td rowspan="4">Ceylan cinnamon</td><td>Indian type</td><td rowspan="4"><i>Cinnamomum zeylanicum</i> Syn.; <i>Cinnamomum verum</i></td></tr><tr><td>Madagascar type</td></tr><tr><td>Seychelles type</td></tr><tr><td>Sri Lanka type</td></tr><tr><td rowspan="5">Cassia cinnamon</td><td>Chinese type</td><td><i>Cinnamomum cassia</i></td></tr><tr><td>Indonesia type,</td><td rowspan="4"><b><i>Cinnamomum burmannii</i></b></td></tr><tr><td><u>Burmanii type</u></td></tr><tr><td><u>Korintje type</u></td></tr><tr><td><u>Padang Cassia type</u></td></tr><tr><td>Saigon or Vietnamese type</td><td><i>Cinnamomum loureirii</i></td></tr></table>				Product	Common name	Trade name/type	Scientific name	CINNAMMON	Ceylan cinnamon	Indian type	<i>Cinnamomum zeylanicum</i> Syn.; <i>Cinnamomum verum</i>	Madagascar type	Seychelles type	Sri Lanka type	Cassia cinnamon	Chinese type	<i>Cinnamomum cassia</i>	Indonesia type,	<b><i>Cinnamomum burmannii</i></b>	<u>Burmanii type</u>	<u>Korintje type</u>	<u>Padang Cassia type</u>	Saigon or Vietnamese type	<i>Cinnamomum loureirii</i>	<p><b>Justification:</b> Compliance with the required template as outlined in document CX/SCH 25/8/10.</p> <p>4. Clarification of Product Description – Removal of Square Brackets. Indonesia supports the removal of square brackets in the sentence: “Cinnamon is a product obtained from the [peeled or unpeeled] dried or dehydrated bark belonging to the species listed in Table 1.”</p> <p>The revised sentence should read: “Cinnamon is a product obtained from the peeled or unpeeled dried or dehydrated bark belonging to the species listed in Table 1.”</p> <p><b>Justification:</b> In international trade, unpeeled cinnamon is preferred by several importing countries of Indonesian cinnamon, particularly in parts of Asia and the Middle East.</p> <p>Explicitly including “unpeeled” in the definition ensures alignment with prevailing market practices and supports the competitiveness of Indonesian cinnamon in global trade.</p>
Product	Common name	Trade name/type	Scientific name																						
CINNAMMON	Ceylan cinnamon	Indian type	<i>Cinnamomum zeylanicum</i> Syn.; <i>Cinnamomum verum</i>																						
		Madagascar type																							
		Seychelles type																							
		Sri Lanka type																							
	Cassia cinnamon	Chinese type	<i>Cinnamomum cassia</i>																						
		Indonesia type,	<b><i>Cinnamomum burmannii</i></b>																						
		<u>Burmanii type</u>																							
		<u>Korintje type</u>																							
		<u>Padang Cassia type</u>																							
Saigon or Vietnamese type	<i>Cinnamomum loureirii</i>																								
<div><b>2.2. Styles</b></div> <div>Cinnamon may be:</div> <div><div>- Whole/stick/quills: Individual, elongated, cylindrical pieces of cinnamon bark curled inward (like a scroll) resulting from the drying process; varying in diameter and has been cut into specific length depend on buyer request.</div></div>				<p>In relation to section 2.2, Indonesia proposes the inclusion of the term “<b>chips</b>” in the style category currently listed as: <b>Pieces/cut/cracked/broken</b>.</p> <p>So, the revised wording would read: <b>Pieces/chips/cut/cracked/broken</b>.</p>																					



Draft Standard								Indonesia Comment	
<ul style="list-style-type: none"> <li>Pieces/cut/cracked/broken: Pieces of bark of various shapes and sizes (they may be curled or uncurled).</li> <li>Ground/powdered (particle size to be determined by contractual agreement between buyer and seller).</li> </ul> <p>Other styles distinctly different from those three are allowed, provided they are labelled accordingly.</p>								<p><b>Justification:</b> The term “<b>broken</b>” may carry a negative connotation, implying damage or inferior quality. In contrast, “<b>chips</b>” is a more neutral and commercially accepted term that better reflects market practices and product presentation.</p> <p>This adjustment would enhance clarity and ensure the terminology used in the standard aligns with trade language and consumer perception.</p>	
<b>ANNEX I</b> <b>[Option 1: Table A1: Chemical characteristics of cinnamon]</b>								<p>In relation to section Table 1, Indonesia proposes as follows:</p> <p>1. Indonesia Propose to remove cinnamaldehyde and coumarin Content from the chemical characteristics' parameter</p> <p><b>Justification:</b></p> <ul style="list-style-type: none"> <li><b>Coumarin</b> is a naturally occurring compound in cinnamon bark and its concentration cannot be effectively controlled through agricultural practices or post-harvest handling. As such, coumarin should not be used as a basis for establishing quality parameters within this standard.</li> <li>Similarly, <b>cinnamaldehyde</b>, while relevant to flavor and aroma, varies naturally across species and growing conditions, and its quantification may not be appropriate for inclusion in a commodity standard.</li> <li>Therefore, Indonesia wishes to reiterate that the Codex Committee on Spices and Culinary Herbs (CCSCH) is not the appropriate forum to discuss the establishment of cinnamaldehyde and coumarin levels. A similar proposal regarding myristicin in nutmeg was previously rejected, and the nutmeg standard—chaired by Indonesia—has been adopted as a Codex standard under CCSCH.</li> </ul> <p>Consistent with all standards developed under CCSCH, Indonesia proposes that both parameters be removed from Table A1:</p>	
Cinnamon	Form/ style	Moisture content % w/w (max)	Total ash% w/w (max) on dry basis	Acid insoluble ash % w/w (max) on dry basis	Volatile oils ml/100 g (min) on dry basis	[Cinnam aldehyde content ml/100 g (min) on dry basis]	[Coumarin content (max) [in mg/g]] [on dry basis]]		
<i>Cinnamomum zeylanicum</i>	Whole/ Stick/ Quills	15.0 [14.0] [13.0]	7.0 [6.0] [5.0]	1.5 [2.0]	1.2 [1.0]	[1.0]	[0.1] [0.3]		
	Pieces/ cut/ cracked/ broken	15.0 [14.0] [13.0]	7.0 [6.0] [5.0]	1.5 [2.0]	1.2 [1.0] [1.5]	[1.0]	[0.1] [0.3]		
	Ground/ powdered	14.0 [12.0]	7.0 [6.0]	1.5 [2.0]	[1.0] [0.5] [1.5]	[1.0]	[0.1] [0.3]		
“Cassia types” ( <i>Cinnamomum cassia</i> ,	Whole/ Stick/ Quills	15.0 [14.0] [13.0]	5.0 [6.0]	1.5 [2.0]	1.0				

Draft Standard								Indonesia Comment	
[ <i>Cinnamomum burmannii</i> ], <i>Cinnamomum loureirii</i> )	Pieces/ cut/ cracked/ broken	15.0 [14.0] [13.0]	5.0 [6.0]	1.5 [2.0]	1.0			<p>Chemical Characteristics of Cinnamon. The establishment of coumarin levels should be scientifically reviewed by JECFA and deliberated within the framework of the Codex Committee on Contaminants in Foods (CCCF), rather than being included in the CCSCH standard.</p> <p>This position reflects the precedent set by the nutmeg standard, as agreed during the 45th Session of the Codex Alimentarius Commission (2022), and aligns with the principle of consistency across CCSCH standards. Indonesia respectfully requests that similar consideration be given to the cinnamon standard, in line with Codex procedural integrity.</p> <p><b>2. Indonesia's Proposal on Chemical Characteristics Values</b></p> <p>Indonesia proposes the following values for the chemical characteristics of cinnamon products, to be reflected in the relevant section of the standard:</p> <ul style="list-style-type: none"> <li>• <b>Moisture Content</b> <ul style="list-style-type: none"> <li>- <b>14% w/w</b> for all product types and styles.</li> </ul> </li> <li>• <b>Total Ash</b> <ul style="list-style-type: none"> <li>- <b>7% w/w</b> for <b>stick and cut</b> forms</li> <li>- <b>5% w/w</b> for <b>powdered</b> form</li> </ul> </li> <li>• <b>Acid-Insoluble Ash</b> <ul style="list-style-type: none"> <li>- <b>2% w/w</b> for all styles</li> </ul> </li> <li>• <b>Volatile Oil Content</b> <ul style="list-style-type: none"> <li>- <b>0.7 mL/100 g</b> for <b>stick and cut</b> forms</li> <li>- <b>0.5 mL/100 g</b> for <b>powdered</b> form</li> </ul> </li> </ul>	
	Ground/ powdered	14.0 [13.0]	5.0 [6.0]	1.5 [2.0]	[1.0]				
["Cassia types": <i>Cinnamomum burmannii</i> ]	[Whole/ Stick/ Quills]	[15.0]	[5.0]	[1.0]	[1.5]				
	[Pieces/ cut/ cracked/ broken]	[15.0]	[5.0]	[1.0]	[1.0]				
	[Ground/ powdered]	[15.0]	[5.0]	[1.0]	[0.8]				
<b>[Option 2 Table A1: Chemical characteristics of cinnamon.]</b>									
Cinnamon	Form/ style	Moisture content % w/w (max)	Total ash % w/w (max) on dry basis	Acid insoluble ash % w/w (max) on dry basis	Volatile oils ml/100 g (min) on dry basis	[Cinnam aldehyde content ml/100 g (min) on dry basis]	[Coumarin content (max) [in mg/g)] [on dry basis]]		
	Whole/ Stick/ Quills	15.0 [14.0]	7.0 [5.0]	2.0 [1.5]	1.0 [1.2]	1.0	0.3		

	Pieces/ cut/cracked/ broken	15.0 [14.0]	7.0 [5.0]	2.0 [1.5]	1.0 [1.2]	1.0	0.3
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Draft Standard								Indonesia Comment
	Ground/ powdered	14.0	7.0 [5.0]	2.0 [1.5]	0.5 [1.2]	1.0	0.3	<b>Justification:</b>  1. Moisture content exceeding 14% increases the risk of mold growth. Based on research findings, the recommended moisture content for dried product is between 12% and 14%.  2. <b>Total ash is based on market demand.</b>  3. The acid-insoluble ash specification follows the American standard as defined by ASTA. Lower acid-insoluble ash values are preferable, as they indicate higher product purity.
Table 2: Physical characteristics for Cinnamon.								In relation to section Table 2, Indonesia proposes as follows:  1. Indonesia supports the establishment of several values related to parameters in the physical characteristics table as follows. <ul style="list-style-type: none"><li>0,5 % of Extraneous matter and foreign matter for all style of cinnamon</li><li>2/100g of dead whole insect for all style of cinnamon</li><li>2 mg/kg of mammalian excreta for all style of cinnamon</li></ul> 2. Indonesia also proposes to change “mould damage” parameter with mould visible <b>Justification:</b> the definition of mould damage, which includes mould combined with insect damage, risks of overlap with insect damage.  Furthermore, Indonesia proposes that the visible mould for all styles be set at 5 w/w for all style
Product	Form/ style	Extraneous matter %w/w (max)	Foreign matter %w/w (max)	[Mould damage] Mould visible %w/w (max)	Dead whole insects count/ 100 g (max)	[Insect damage %w/w (max)]	Insect fragments count/ 10g (max)- ground only	
Cinnamomum spp.	Whole/Stick/ Quills	[0] [0.5] [1.0]	[0.50] [0]	[0] [1.0] [5.0]	[0] [2.0]	[0] [1.0]	NA	
	Pieces/ cut/ cracked/ broken	[0] [1.0] [5] [0.5]	0 [0.50]	[0] [1.0] [5.0]	[0] [2.0] [3.0]	[0] [1.0]	NA	
	Ground/ Powdered	0 [1.0] [0.5] NA	0 [0.50] NA	[0] [1.0] [5.0]	NA [2]	NA	100/50 [20/10] [400/50]	
Product	Form/ style	Live insects	[Excreta mammalian and/other mg/kg (max)]	[Excreta, other mg/kg (max)]	[Rodent filth count / 25 g]	[Off-size (when sized %)]		

<i>Cinnamomum</i> <i>spp.</i>	Whole/Stick/ Quills	0	[0.0] [1.0] [2.0]	[0] [4.0]	NA	[10]
	Pieces/ cut/	0	0 [2.0]	0 [NA]	NA	NA

Draft Standard							Indonesia Comment
	cracked/ broken						
	Ground/ Powdered	0	0 [2] [NA]	0 [NA]	1/50 [11/50]	NA	
Note: [N/A=Not applicable, means that this form of the above product has not been evaluated for this provision, and currently we do not have values. N/A does not refer to zero.]							