

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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World Health
Organization

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Agenda Item 2.1, 3.1, 3.2, 4.1, 5.1, 6.1, 7.3

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

Burundi appreciates the opportunity to provide comments on the different agenda items to be discussed by the eighth Session of the Codex Committee on Spices and Culinary Herbs.

Agenda item 2.1: Information on the use of the term “Country of harvest” in the labelling of spices Document.

Position: Burundi does not support the inclusion of the "country of harvest" as a mandatory labelling requirement in the standard for all spices and commodities.

Rationale: This requirement could introduce unnecessary trade barriers and economic inefficiencies without delivering tangible benefits in terms of food safety or fraud prevention. This requirement lacks economic, regulatory, or trade justification, and its unintended consequences could have far-reaching implications for producers, exporters, and global supply chains—particularly in developing economies.

Agenda item 3.1: Requirements for Vanilla (Comments at Step 6/7)

2.2 Styles

Position: Burundi supports the deletion of Vanilla Supreme and retention of Vanilla caviar. vanilla pulp and seeds or vanilla or [vanilla-caviar] [~~Vanilla Supreme~~] – comprising of vanilla pulp and seeds.

Rationale: Vanilla supreme may be confused with other products not associated with dried vanilla eg cosmetics. Vanilla caviar is a common name that is used in trade.

Position: Burundi supports the deletion of the combined (ground/powdered) style. The two should be separated as proposed by the EWG chair.

Rationale: Separating ground and powdered dehydrated vanilla styles will allow the moisture content characteristics of each to be assessed independently.

Position: Burundi wishes to draw attention to the term ground vanilla paste which can cause confusion about the appearance of the final product. Separate vanilla paste from vanilla powder. Create a new style, vanilla paste.

Rationale: The use of the word “paste” creates some confusion when translated to French. The name should be either “ground powder” or “ground paste”. Grinding fresh vanilla will result in the formation of a paste, while grinding dry vanilla will produce a powder.

4. Food Additives

Position: Burundi supports that the Addition of food additives should be optional.

Rationale: Even though this is not the case in actual practice, it should be made optional in the standard.

Position: Burundi agrees that it is possible to avoid the use of anti-caking agents, as dry pods (with a moisture content of 25% or less) and the powders obtained from them are naturally free-flowing. Ground or milled pods do not require anti-caking agents if the pods used are of good quality and have an appropriate moisture level.

Rationale: Powders or ground/milled pods do not require anti-caking agents if the pods used are of good quality and have an appropriate moisture level. They must also be stored in dry conditions and in suitable packaging.

8.1.3 Trade name, Species or Cultivar

Position: Burundi supports Trade name, species, or cultivar shall be listed on the label. Burundi supports to use the word “**shall**” instead of “**may**”

Rationale: The Trade name, species, and cultivar are the definitive trademark of the product and should be included on the label.

Table A1. Chemical characteristics for vanilla per species

Position: Burundi supports Option 1.

Rationale: Option 1 has been working in trade.

Table A3 Colour

Position: Burundi supports to use the visual option, Munsell Chart for determining colour, instead of the ISO Sensory Analysis method.

Rationale: Use the visual chart because it is affordable and easy to use. The Munsell Colour Chart does not require setting up a Sensory Panel.

Agenda item 3.2: Requirements for Large Cardamom (Comments at Step 3)

2.2 Styles

Position: Burundi supports that Up to 5% of the Dried Cardamom capsules may be opened and are still considered to be part of the whole category.

Rationale: A given percentage can easily be quantified compared with the provision for one-fourth of the product.

8.2.3 Region of Harvest and Year of Harvest

Position: Burundi finds that “May be declared” and “Optional” mean the same thing and suggests that the word “Optional” be used. “May be declared should be deleted”.

Rationale: As “May be declared” and “Optional” mean the same thing, only one of them is required in the standard. Keep “Optional” and delete “May be declared”.

Table 2: Methods of Analysis

Position: Burundi sees that extraneous matter and foreign matter appear to be referring to the same thing and they both have the same method of analysis ISO 927. Burundi proposes revised text as follows: “Extraneous matter (including Foreign Matter, Rodent filth)”

Rationale: Extraneous matter and foreign matter refer to the same thing. It is important to fuse them together in the table.

Position: Burundi finds that Table A2 is not in alignment with the General requirements in Section 3.2.1 with regards to the extraneous and foreign matter in the product. Burundi proposes the deletion of Table A2

Rationale: The conflict between the provisions in Table A2 and the mandatory requirements prefixed with “shall” in section 3.2.1 justifies the removal of Table A2 from the Standard.

Table A1: Chemical Characteristics for dried or dehydrated large Cardamom

Position: Burundi supports to remove square brackets for all parameters.

Rationale: Reference ISO 10622:1997

8.1.3 Trade name, variety or cultivar

Position: Burundi supports that the indication of the trade name, species, and variety shall be mandatory on product labels.

Rationale: Reference ISO 10622:1997

Agenda item 4.1: Requirements for Cinnamon (Comments at Step 3)

2.1 Product definition

Position: Burundi proposes to remove the square brackets around peeled and unpeeled in the product definition as shown below.

“Cinnamon is a product obtained from peeled or unpeeled dried or dehydrated bark belonging to the species listed in Table 1”.

Rationale: Cinnamon as a product is obtained from dried or dehydrated bark whether peeled or unpeeled.

2.1 Table 1: Species of cinnamon covered by this standard

Position: Burundi supports option 2 of Table 1 which facilitates easy identification of the cinnamon being referred to.

Rationale: The table is much clearer with common names and trade names that are recognized during trade. Further it has classified the Trade names according to scientific names

Position: Burundi encourages the eWG to provide more data in Table A2 of the Annex.

Rationale: Providing this data will allow for better characterization of the product.

Position: Burundi encourages research into a method for measuring coumarins by HPLC or gas chromatography.

Rationale: The dosage method will allow better characterization of the product.

Position: Burundi encourages harmonization through the terms “foreign bodies” and “foreign materials.”

Rationale: For French speakers, the two terms express same thing.

Position: Burundi supports maintaining the parameters and the proposed values for "cinnamaldehyde content" and "coumarin content" in the table A3.

Rationale: These two parameters contribute to better characterize the product.

8.1.3 Scientific name of the product

Position: Burundi supports that the scientific name of the product should be mandatory because there is a difference between the Cassia and the Ceylan types of cinnamon

Rationale: The scientific name of the product should be mandatory to ensure unambiguous identification and differentiation between species, such as *Cinnamomum cassia* and *Cinnamomum verum* (Ceylon cinnamon). These species differ significantly in chemical composition, quality attributes, and potential health implications. Mandatory inclusion of the scientific name on labels enhances traceability, protects consumers, and supports regulatory compliance and fair trade.

Table A3 Methods of analysis for Cinnamon

Position: Burundi proposes removing the square brackets around Coumarin, Methanol Extract and HPLC All the square brackets in that row should be removed.

Rationale: it is the basis for the strength of the spice in trade.

[Option 2 Table A1: Chemical characteristics of Cinnamon.]

Position: Burundi suggests that Option 2 should be used for Table A1.

The square brackets around the values for Moisture content % w/w (max), Total ash % w/w (max) on dry basis and Acid insoluble ash % w/w (max) on dry basis for all styles should be deleted.

The values in square brackets for Volatile Oils in ml/100g (min) on dry basis for Whole/ Stick/ Quills and Pieces/ Cut/ Cracked/ Broken should be deleted.

Rationale: These values represent the Upper values obtained from ISO 6539 1997

Agenda item 5.1: Requirements for Coriander (Comments at Step 3)

Position: Burundi suggests the deletion of the word seed in square brackets in the first line of the Product Definition as Coriander is obtained from the dried or dehydrated mature fruit of *Coriandrum sativum* L.

Coriander is a product obtained from the dried or dehydrated mature fruit of *Coriandrum sativum* L.

Rationale: Coriander product is derived from the mature fruit which splits to have the two individual mesocarps (seed) even though Coriander seed is the product that is being traded. The term “seeds” is more used in practice.

Position: Burundi encourages harmonization of the terms “foreign bodies” and “foreign materials.”

Rationale: For French speakers, the two expressions are the same.

Position: Burundi encourages the eWG to provide more data in Table A2 of the Annex.

Rationale: Providing this data will allow for better characterization of the product.

8.2.3 Region of harvest, year of harvest

Position: Burundi does not support inclusion of region of harvest in the standard. The year of harvest however, should be included in the standard.

Rationale: The region of harvest should not be included in the standard because it is not a reliable or scientific determinant of product quality or safety. Conditions within the same region can vary significantly, and factors such as cultivation methods, post-harvest handling, drying, and storage practices have a much greater impact on the chemical composition, microbiological safety, and authenticity of spices. By contrast, the year of harvest provides meaningful scientific information, as the age of the product directly affects freshness, stability of key compounds, flavor, and susceptibility to contamination such as mold or mycotoxins. Including the year of harvest therefore enhances traceability, supports risk assessment, and ensures consumers and regulators have accurate information on the safety and quality of the product.

Table A1: Chemical characteristics of dried or dehydrated Coriander

Position: Burundi suggests that for

1. **Whole Split**

9% Moisture w/w (max.) for both Group A & B should be the value used.

Volatile oils mL/100g on dry mass (min.) Group A ≥ 0.5 , Group B 0.1-0.5

2. **Cracked/broken/Powdered /Ground Style -Volatile oils mL/100g on dry mass (min.)**

Group A ≥ 0.5 , Group B 0.1-0.5

Rationale: These are the values obtained from the Reference ISO 2255:1996

Agenda item 6.1: Requirements for Sweet Marjoram

1. Scope

Position: Burundi proposes to add -dried sweet marjoram after culinary herbs This standard applies to dried culinary herbs- dried sweet marjoram, as defined in Section 2.1 below offered for direct human consumption, commercial food processing or for repackaging if required. It excludes the product for industrial processing.

Burundi supports the rewording of «sweet marjoram, dried and dehydrated» to «dried marjoram», which makes Table 1 easier to read.

Burundi supports alignment with other SCH standards

Rationale: For clarity on the specific herb being covered in the scope

8.3 Commercial Identification

Position: Burundi suggests the removal of the bullet point Style from this Section as Style is already included in the label in Section 8.1.2

Rationale: This is to avoid repetition of the Style of the Sweet Marjoram on the label

Table 2 Methods of Analysis

Position: Burundi suggests that the two rows on Insect fragments and Insect damage, be merged with the row on Extraneous Matter to read as follows: "Extraneous Matter (Insect fragments, whole dead insects, live insects, Insect damage/defiled/infested)"

Rationale: Four rows in Table 2 use the same Method of Analysis ISO 927.

Thus, the rows on Insect fragments, whole dead insects, live insects and Insect damage/defiled/infested should be included under Extraneous Matter

Agenda item 7.3: Update to the template for SCH standards Document.

Section 8.4 Net Weight

Position: Burundi suggests that the definition for Net Weight be included in the Standard as part of Section 8.4 to read as follows: Net weight is the weight of the spice or culinary herb contained within the package.

Rationale: This is to make it clear to anyone using the standard, what Net weight means.

Table 2 Methods of Analysis

Position: Burundi suggests that the two rows on Insect fragments and Insect damage, be merged with the row on Extraneous Matter to read as follows: Extraneous Matter (Insect fragments, whole dead insects, live insects, Insect damage/defiled/infested).

Rationale: Four rows in Table 2 use the same Method of Analysis ISO 927. Thus, the rows on Insect fragments, whole dead insects, live insects and Insect damage/defiled/infested should be included under Extraneous Matter.