

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2

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

Eighth Session

MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND ITS SUBSIDIARY BODIES

(Comments of Canada, the European Union, Kenya, Thailand)

Canada

Canada welcomes the opportunity to provide its views on the matters referred by the Codex Committee on Methods of Analysis and Sampling (CCMAS) and the Codex Committee on Food Additives (CCFA) to the Codex Committee on Spices and Culinary Herbs (CCSCH).

In response to CX/SCH 25/8/2, Canada is pleased to share the following positions and perspectives for consideration.

Part A: Matters referred by the 43rd and 44th Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS43 and CCMAS44)

1. Test portion and method for light seeds in small cardamom

Canada supports the use of ISO 927 as the applicable method for determining test portions in Codex standards, including for light seeds in small cardamom. ISO 927 is internationally recognized, harmonized, and already endorsed for similar provisions in other spice standards. Its use promotes consistency across Codex texts and aligns with Codex's preference for internationally validated methods.

2. Methods for curcuminoids content, on dry basis (colouring power) and provision name - Turmeric

Canada recommends option (b): revising the provision name to "colouring power expressed as curcuminoids". This approach:

- Maintains continuity with existing Codex standards (e.g. Saffron's "colouring strength expressed as crocin").
- Acknowledges the limitations of ISO 5566 while preserving its utility.

3. The method for pungency, Scoville heat units and appropriate provision name - dried chilli and paprika

Canada recommends option (a): redefining the provision to "capsaicinoids", which would allow the use of AOAC 995.03 as a Type II or III method. This approach:

- Reflects the chemical basis of pungency more accurately.
- Avoids reliance on conversion factors that may vary across methods.
- Supports scientific precision and harmonization with analytical standards.

4. The method for mould visible – Cloves

Canada supports the endorsement of ISO 927 as a Type I method for visible mould in cloves, consistent with its use in other Codex spice standards. ISO 927 provides a standardized approach for visual examination and is suitable for assessing macro filth, including mould. This endorsement would align with Codex's preference for internationally validated methods and ensure consistency across spice standards.

Part B: Matters referred by the 54th and 55th Sessions of the Codex Committee on Food Additives (CCFA54 and CCFA55)

1. Consideration of a group food additive "SULFITES" in CXS 343-2021

Canada supports expanding the bleaching agent provision in CXS 343-2021 to include potassium metabisulfite (INS 224), sodium metabisulfite (INS 223), and sodium sulfite (INS 221), provided that:

- The additives are technologically justified for bleaching dried ginger;
- No safety concerns exist beyond those covered by the shared ADI;
- The expansion supports Codex consistency and GSFA alignment.

Canada notes that the GSFA limits adequately reflect use in foods conforming to CXS 343-2021. If CCSCCH considers expansion appropriate, Canada recommends limiting it to sulfites with the bleaching agent function only and requesting CCFA to ensure that only these are permitted in CXS 343-2021.

To preserve functional specificity, CCFA could apply a Note to the SULFITES group, such as:

- “For use in products conforming to CXS 343-2021 as a bleaching agent”; or
- “For products conforming to CXS 343-2021: INS 220, 221, 223, and 224 only, as bleaching agents.”
- This approach offers a balanced compromise between functional clarity and alignment with Codex principles.

2. GSFA Table 3 related questions

Canada appreciates the opportunity to provide input on the alignment of food additive provisions in Codex standards for spices and culinary herbs with the General Standard for Food Additives (GSFA). We offer the following comments and recommendations in response to the questions raised:

1) Should standardized spices require Table 3 additives, or should both standardized spices and culinary herbs be included in the Annex to Table 3?

Canada supports the inclusion of both standardized spices and culinary herbs in the Annex to Table 3 of the GSFA. This position is based on the following rationale:

- **Purity and minimal additive use:** Standardized spices and herbs are generally considered “pure” products. Their composition is tightly defined in Codex standards, and only a minimal number of additives (e.g., anticaking agents, sulfur dioxide in specific cases) are permitted.
- **Consistency and clarity:** Including both herbs and spices in the Annex would harmonize treatment across similar commodities and reduce confusion regarding additive permissions.
- **Alignment with recent revisions:** The revised descriptors for food categories 12.2.1 and 12.2.2 (REP23/FA) eliminate overlap, supporting a unified approach to additive restrictions.

Canada recommends that any necessary additives for standardized products be listed explicitly in Tables 1 and 2, ensuring transparency and regulatory clarity.

2) Revisions to the GSFA reference in the SCH template

Canada agrees that the Food Additives section in the SCH template should be revised to reflect the inclusion of herbs and spices in the Annex to Table 3, should spices also be included in the Annex to Table 3. Specifically:

- The template should reference **only Tables 1 and 2** of the GSFA.
- This change simplifies the template and aligns with the proposed exclusion of Table 3 additives for these commodities.

3) Revision to the “References to Commodity Standards for GSFA Table 3 Additives”

Canada supports the removal of spice standards from the “References to Commodity Standards for GSFA Table 3 Additives” if spices are added to the Annex to Table 3 where herbs are already included. This would ensure consistency and avoid misinterpretation of additive permissions.

4) Clarification regarding non-standardized spice products

Canada recognizes that non-standardized spice products, (for examples: pastes, roux, etc) may require additives not permitted in standardized forms. However:

- These products are distinct from standardized commodities and should be treated separately.
- Canada recommends that if there are non-standardized products falling under Food Category 12.2.1, then those non-standardized products remain outside the Annex to Table 3, allowing for additive permissions to be defined in Tables 1, 2, and/ or 3 based on technological need, good manufacturing practices and safety assessments.

The European Union

43rd and 44th Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS43 and CCMAS44)

Mixed Competence

Member States Vote

14. CCMAS 43:

(iii) CCMAS43, further took the following decisions:

Test portion for and method for light seeds in small cardamom

- b. noted that the IS 1907 is an Indian Standard (IS) for cardamom specifications. However, the specification regarding light seeds is already included in the Standard for spices derived from dried or dehydrated fruits and berries – small cardamom. IS 1907 makes reference to IS 1790 a standard for methods for spices and condiments, which determines a test portion from 100 g to 200 g depending on the nature of the material. CCMAS thus agreed to consult CCSCH regarding the test portion size and if the ISO 927 is applicable for the provision of light seeds; (See Appendix, Part 1 A of this document).

The European Union and its Member States (EUMS) suggest that the ISO 927 should be used for determining light seeds in small cardamom. However, the title of ISO 927 says “*Determination of extraneous matter and foreign matter content*” and to avoid confusion, a footnote could explain that “light seeds” have to be determined.

Methods for curcuminoids content, on dry basis (colouring power) and provision name – Turmeric

- (iv) did not endorse the methods for curcuminoids content on dry basis (colouring power) as the ISO 5566 does not measure curcuminoids directly, and that the method measures the absorption of light at 425 nm and then converts that absorption to a curcuminoid content. CCMAS43 noted that it was possible for colouring adulterants to affect this measurement value and also noted that the name of the provision was inconsistent with other similar provisions such as “colouring strength (expressed as crocin)” in the *Standard for Dried Floral Parts – Saffron* (CXS 351-2022). CCMAS43 requested CCSCH to either:
 - a. recommend a method that directly measures the curcuminoids and then to change the provision accordingly to “curcuminoids”; or
 - b. change the name of the provision to make it clear that the provision is “colouring power expressed as curcuminoids” (See Appendix, Part 1 B)

The EUMS would like to suggest considering that in case the focus of the provision is on “colouring power” and to be in line with the specifications of “ISO 5562 – Turmeric, whole or ground (powder)”, the provision should be changed to “colouring power, expressed as curcuminoids content, % (m/m) on dry basis” (according to the wording of ISO 5562). ISO 5566 would then be the appropriate method of test (as specified in ISO 5562).

If the intention is to quantify curcuminoids as m/m %, e.g. as an identity criterion, a different method of test has to be specified (e.g. AOAC 2016.16.).

The method for pungency, Scoville heat units and appropriate provision name - dried chilli and paprika

- (v) endorsed the ISO 3513 (pungency, Scoville Heat Units), but did not endorse the ASTA 21.3 (pungency, Scoville Heat Units) in dried chilli and paprika. Similar to the ISO 5566 method for colouring power, the ASTA 21.3 method quantifies capsaicin and oleoresins and then converts those concentrations into “pungency, Scoville Heat Units”. The conversion to Scoville Heat Units makes the method Type I (i.e. the provision, “pungency” is defined by the conversion factor of the method), but there can only be a single Type I method for a provision. CCMAS43 requests that CCSCH either:
 - a. redefines the provision to “capsaicinoids” in which case the AOAC 995.03 could be recommended for endorsement as a Type II or Type III method: or
 - b. responds to CCMAS that ASTA 21.3 is preferred over ISO 3513 in which case CCMAS may revoke the ISO 3513 and replace the method with ASTA 21.3 as a Type I method. (See Appendix, Part 1 C)

The EUMS would like to note that if “pungency” expressed in Scoville units is to be determined, either a sensory test method, ISO 3513 or an instrumental method, the ASTA 21.3 could be endorsed as Type I method.

If a more objective test is deemed necessary, ASTA 21.3, which determines capsaicinoids by HPLC and then converts it into Scoville units, would be the preferred test. Then the ISO 3513 method would have to be revoked as both ISO 3513 and ASTA 21.3 are Type I and only one Type I method per provision is allowed.

The method for mould visible – cloves

- (vi) endorsed the Method V-8 (mould visible – cloves) as Type IV but did not endorse the ISO 927 and requested that CCSCH should confirm whether ISO 927 would be a better Type I method. This method had been endorsed for the same provision for certain other spices and culinary herbs (e.g. dried or dehydrated ginger, turmeric).

The EUMS would like to note that there is differentiation as regards the terms “visible mould” and “mould damage” in the different spice standards in CXS 234-1999. The methods are also different, in some cases there is the ISO 927 in other cases the Method-V-8 listed. Both methods are based on visual examination and counting or weighing of the mould damaged/visible mould part of the sample. Thus, the EUMS would like to ask for clarification why the distinction into “visible mould” and “mould damage” exists and whether ISO 927 couldn't be used for both provisions.

54th and 55th Session of the Codex Committee on Food Additives (CCFA5)

European Union Competence

European Union Vote

Consideration of a group food additive “SULFITES” in CXS 343-2021

19. CCFA55 agreed to consult CCSCH on the possible general principle of expanding provisions to all food additives in a group that shares an appropriate technological function and to forward the following explanatory text for consideration:

“CCFA55, while aligning the food additive sections in *Standard for dried roots, rhizomes and bulbs: Dried or dehydrated ginger* (CXS 343-2021) with those in the GSFA, noted that CXS 343-2021 permitted the use of sulfur dioxide (INS 220) only as a bleaching agent and that in the GSFA, this additive was under a group food additive “SULFITES”. It was further noted that according to the Codex Procedural Manual, “Food additives that share a numerical group ADI will be considered as a group without further restrictions on the use of individual additives in that group. Therefore, CCFA55 requests that CCSCH:

- a) clarify why only sulfur dioxide is allowed for use in products conforming to CXS 343-2021; and
- b) consider why it would not be appropriate to include other additives under the same group header with same functional classes” (See Appendix, Part 2 A)

In the EU Sulfur dioxide (INS 220) or sulfites (INS 220-225, 539) respectively, are not permitted for use as a bleaching agent in foods conforming to CXS 343-2021. The European Union (EU) assumes that those Codex Members recognising the technological need for the use of bleaching agents in foods conforming to CXS 343-2021 identified only the use of INS 220 and therefore only INS 220 was permitted for use as a bleaching agent in foods conforming to CXS 343-2021.

The EU accepts following the principle outlined in the Procedural Manual, i.e. to consider sulfites as a group without further restrictions, while the EU keeps its view that the use of sulfites as a bleaching agent in foods conforming to CXS 343-2021 is not necessary.

GSFA Table 3 related questions

20. CCFA55 agreed to consult CCSCH on whether standardized spices require Table 3 additives in GSFA, or if both standardized spices and culinary herbs could be included in the Annex to Table 3, for consideration by CCFA56 or later and to forward the following explanatory text for consideration:

In considering the alignment of food additive provisions in herb and spice commodity standards with the *General Standard for Food Additives* (CXS 192-1995), CCFA notes that the Annex to Table 3 (the list of food categories for which Table 3 additives are not permitted) specifically excludes spices in food category

12.2.1 (Herbs and Spices), meaning that Table 3 additives are permitted in spices, but not in herbs. (See Appendix, Part 2 B)

However, a minimal number of additives are permitted in both Standardized spices and herbs: “only anticaking agents are permitted in ground/powdered herbs”; only anticaking agents are permitted in ground/powdered spices, sulfur dioxide (as a preservative) in green peppers (as per the *Standard for black, white and green peppers* (CXS 326-2017)) and sulfur dioxide (as a bleaching agent) in dried or dehydrated ginger (as per the *Standard for dried roots, rhizomes and bulbs: Dried or dehydrated ginger* (CXS 343-2021)). No other additives are permitted in standardized spices.

There was recent work at CCFA53 ([REP23/FA](#)) to:

- 1) revise the descriptors of FCs 12.2.1 and 12.2.2; and
- 2) to move the provisions for sweeteners in FCs 12.2 and 12.2.1 and consider their use in FC 12.2.2.

In the Report of the EWG on the GSFA (CX/FA 22/53/8), it was indicated that there appeared to be general consensus that herbs and spices are “pure” products in which the use of food additives should be limited. These same comments also noted that the use of additives may be justified in “seasonings” that are not justified in herbs and spices. There was also general consensus that there is overlap of products captured in FC 12.2.1 and 12.2.2.

Given that food additive use should be limited in both herbs and spices, and that the descriptors of FCs 12.2.1 and 12.2.2 have been revised such that there is no longer any overlap between them (REP23/FA; CAC 46), it would seem prudent to treat herbs and spices the same and include them both in the Annex to Table 3. Accordingly, any food additive provisions would be set out in Tables 1 and 2 of the GSFA.

CCSCH is invited to consider if standardized spices require Table 3 additives, or if both standardized spices and culinary herbs could be included in the Annex to Table 3, meaning that Table 3 additives should not be used, unless set out in Tables 1 and 2 of the GSFA.

CCSCH is also invited to consider the following issues for action or comment:

- i) Revisions to the general reference to the GSFA in the template for spice and culinary herb (SCH) Standards

Were both standardized spices and culinary herbs to be placed in the Annex to Table 3, then the “Food Additives” section of the SCH Standards need only make reference to Tables 1 and 2 of the GSFA, and not Table 3.

On the other hand, should spices continue to be excluded from the Annex to Table 3, then a modification to the “Food Additives” is nonetheless recommended. Specifically, for anticaking agents in spices the Food additive text in the template should read “Anticaking agents listed in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in the ground/powdered form of {SCH spice group or individual SCH spice}.”; while for anticaking agents in herbs, the Food Additive text in the template should read, “Anticaking agents listed in Table 1 and Table 2 of food category 12.2.1 (herbs and spices) of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in the ground/powdered form of {SCH herb group or individual SCH herb }.”

- ii) Revision to the “References to Commodity Standards for GSFA Table 3 Additives” of the GSFA

Were both standardized spices and culinary herbs to be placed in the Annex to Table 3, then the listings for spice standards should be removed from the “References to Commodity Standards for GSFA Table 3 Additives” of the GSFA.

- iii) Clarification regarding non-standardized spice products

While standardized herbs and spices are deemed to be relatively pure products, food category 12.2.1 also makes reference to “Spices may also be found as blends in powder or paste form.” Spice pastes do not fall under the relevant standards and would thus be non-standardized. It is conceivable that certain additives (e.g., antioxidants) might be necessary in certain pastes, such as in a roux. Is CCSCH aware of any non-standardized products that require Table 3 additives, generally; or could nonstandardized products also be included in the Annex to Table 3, such that any necessary food additives could be defined in Tables 1 and 2? The latter would allow the entirety of food category 12.2.1 to be added to the Annex to Table 3 of the GSFA.

[The EU is of the view that the technological need for the use of additives in both herbs and spices is minimal. The EU considers that both herbs and spices should be treated in a similar manner. In addition, the EU is not aware of any additional technological need for the use of additives in non-standardised products falling](#)

within the GSFA food category 12.2.1. Therefore, the EU supports that the entirety of food category 12.2.1 to be added to the Annex to Table 3 of the GSFA.

Kenya

General Comment:

Kenya commends progress made by Codex and CCSCH in developing international standards for spices and culinary herbs, which enhance consumer protection and fair trade.

Kenya supports continuation of new work on sweet marjoram, coriander, large cardamom, and cinnamon, ensuring inclusivity and leadership opportunities for developing countries.

Kenya provides the specific comments on various issues on this agenda as follows:

Issue 1

Country of Harvest (COH) labelling

Position: Kenya recognizes the value of transparent labelling but considers the current Country of Origin (COO) provisions in CXS 1-1985 sufficient when well implemented. Mandatory declaration of COH could create enforcement and trade challenges, especially for small producers and multi-country value chains. Kenya supports voluntary COH labelling where it adds value but opposes making it mandatory. Kenya further supports continued clarification of COH and COO definitions through the EWG before final consideration by CCFL49. Additionally, Kenya notes that, as a net importer of most herbs and spices, it would face significant difficulties in verifying and certifying COH and COO declarations during import inspections. This further reinforces the need for a pragmatic and flexible approach to COH labelling.

Issue 2

Analytical methods (CCMAS)

Position: Kenya supports ISO 927 method of analysis for determining light seeds in cardamom, renaming the turmeric parameter to “colouring power expressed as curcuminoids,” and redefining “pungency” in chilli and paprika as “capsaicinoids” to improve analytical precision and international harmonization.

Issue 3

Food additives (CCFA)

Position: Kenya supports maintaining the purity of standardized spices and herbs, limiting additive use to those explicitly listed in GSFA Tables 1 and 2. Kenya agrees to include both spices and herbs in the Annex to Table 3 and recommends further justification before expanding sulfite use beyond sulfur dioxide (INS 220).

Issue 4

Contaminants (CCCF)

Position: Kenya supports adoption of Maximum Levels (MLs) for *lead in dried bark spices* and *culinary herbs*, and advancement of sampling plans for *aflatoxins* and *ochratoxin A* to Step 8, recognizing their importance for food safety and trade facilitation.

Issue 5

Strategic Plan and New Work

Position: Kenya supports implementation of the Codex Strategic Plan 2026–2031 and calls for stronger participation of developing countries, enhanced capacity building, and data-driven engagement in Codex work.

General Comment: Kenya supports voluntary COH labelling, harmonized analytical methods, limited additive use, adoption of contaminant MLs, and inclusive Codex processes that promote fair trade and consumer protection.

Thailand

CCMAS43

Thailand supports ISO 927 as the Type I method for the provision of light seeds in the standard for small cardamom, because both ISO 927 and IS 1907 share the same methodological principles and test portion sizes.

CCFA55

Thailand agrees with the following revisions to the food additives provisions proposed by CCFA55:

For anticaking agents in spices, the Food Additive text in the template should be "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 {SCH spice group or individual SCH spice}".

For anticaking agents in herbs, the Food Additive text in the template should be "Anticaking agents listed in Table 1 and Table 2 of General Standard for Food Additives (CXS 192-1995) are acceptable for use in ground/powdered form of {SCH herb group or individual SCH herb}".

CCFL47

Thailand would like to request CCFL to clearly define the term "Country of Origin (COO)" due to the member countries' differing understandings. In particular, the word "changes its nature" in section 4.2.5 of CXS 1-1985 should be clarified as to which types of processing are covered, as well as the relevant examples of SCH commodities that also should be provided. Furthermore, in the case of the blending products, is it identified as changing their nature or not? It would be complicated to have to state each country of harvest on the label.