



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

Eighth Session

DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED FRUITS AND BERRIES

REQUIREMENTS FOR VANILLA

(Comments of El Salvador, the European Union, Ghana, Philippines, Thailand)

El Salvador

Tema 3.1 PROYECTO DE NORMA PARA ESPECIAS DERIVADAS DE BAYAS Y FRUTOS SECOS O DESHIDRATADOS – REQUISITOS PARA VAINILLA

Comentarios generales:

El Salvador agradece el trabajo realizado el grupo de trabajo por medios electrónicos presidido por Estados Unidos de América y copresidido por India, Madagascar y México.

Se ha analizado el Apéndice 1 Proyecto de norma para especias derivadas de bayas y frutos secos o deshidratados – Requisitos para vainilla. (En el Trámite 6), se detallan en los comentarios específicos las secciones de interés.

Comentarios específicos:

El Salvador brinda sus comentarios en las diferentes secciones del Apéndice 1:

En 2.2 Formas de presentación, La vainilla seca o deshidratada puede ser:

- (4) la pulpa y semillas de vainilla ~~o [caviar de vainilla] [vainilla suprema]~~ - incluyendo la pulpa y las semillas de vainilla; o
- (5)~~[molida/en polvo – derivada de vainas enteras, cortadas y partidas molidas;]~~
- (6)~~[molida - derivada de vainas enteras, cortadas y partidas - puede ser o no ser fluida;]~~ **y/o?**
- (7)~~[en polvo - derivada de vainas enteras, cortadas y partidas – en forma fluida].~~

Al respecto en 4to enunciado del texto del 2.2, se apoya el término “pulpa y semilla de vainilla” y se elimina el término “caviar de vainilla” y en el 6to y 7mo enunciado del texto del 2.2, se está de acuerdo en mantener la diferenciación entre vainilla molida y vainilla en polvo, se apoya el termino al final del 6to. enunciado “y”; por tanto, se propone eliminar el 5to enunciado que hace referencia a los términos en conjunto “molida/en polvo”.

Justificación del 4to enunciado:

Conforme a lo establecido en la CXS 291-2010 Norma para el Caviar de Esturión, el término caviar se define como “el producto obtenido a partir de las huevas de peces de la familia de los *Acipenseriformes* mediante su tratamiento con sal de calidad alimentaria”. En este sentido, dicho término cuenta con una definición y un uso expresamente regulado, por lo que no resulta procedente aplicarlo a productos distintos de los señalados en la norma, como es el caso de la denominación “caviar de vainilla”.

En concordancia, la Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1985) establece en su apartado 3.1 que los alimentos no deben describirse ni presentarse de manera falsa, equívoca o engañosa, ni susceptible de inducir a error respecto de su verdadera naturaleza. Asimismo, en el apartado 4.1 dispone que el nombre del producto debe indicar la naturaleza real del alimento.

En este contexto, la utilización del término “caviar de vainilla” en el etiquetado podría inducir a error al consumidor y generar una barrera técnica al comercio, al no corresponder con la naturaleza real del producto ni con la definición reconocida internacionalmente para la palabra caviar.

Por lo tanto, y en el marco de la normativa aplicable, El Salvador considera pertinente mantener únicamente la designación “pulpa y semillas de vainilla” como descripción adecuada, coherente con los textos generales del

Codex y respetuosa de los principios de veracidad y claridad en el etiquetado de alimentos.

Justificación 6to y 7mo enunciado:

Se establece la pertinencia técnica de diferenciar las presentaciones de vainilla bajo las denominaciones "molida" y "en polvo", ya que representan productos con especificaciones físicas distintas. La humedad es el factor primordial que influye en la estabilidad. La presentación clasificada como "en polvo" generalmente implica un proceso de deshidratación más riguroso, lo que resulta en un menor contenido de humedad residual (incluso inferior al 15% que algunas normas sugieren para productos pulverizados), mientras que los "molidos" contienen porcentajes de humedad más elevados. El término "en polvo" se reserva a menudo para una molienda ultrafina (ejemplo: pasando por mallas de granulometría muy pequeña), mientras que "molida" puede referirse a una partícula más gruesa.

En numeral 4. Aditivos Alimentarios

[Los antiaglomerantes enumerados en el Cuadro 3 de la Norma general para los aditivos alimentarios (CXS 192-1995) son aceptables para el uso en la forma molida/ y en polvo del producto que conforma a esta norma.]

Se respalda la propuesta de autorizar el empleo de agentes antiaglomerantes como aditivos alimentarios en la vainilla, en sus presentaciones molida y en polvo. Por tanto, eliminar el símbolo "/" y agregar "y" para diferenciar la forma de presentación diferenciada de la vainilla.

La justificación técnica:

Radica en la función propia de estos aditivos, que reducen la tendencia de los componentes de un alimento a adherirse unos a otros, característica común en productos de granulometría fina o pulverizados, particularmente aquellos con contenido de materia grasa y susceptibles a la absorción de humedad ambiental. Su incorporación resulta esencial para preservar la fluidez del producto, facilitar su dosificación y mantener su integridad, contribuyendo a garantizar la calidad y la vida útil a lo largo de la cadena de comercialización.

Aunque no se identifique una categoría exclusiva para la vainilla procesada, existe coherencia regulatoria con lo dispuesto en la Norma General para los Aditivos Alimentarios (CXS 192-1995), que autoriza el uso de agentes antiaglomerantes en la categoría de hierbas aromáticas y especias.

En virtud de lo anterior, se considera técnicamente procedente autorizar el uso de estos aditivos en vainilla molida y en polvo, garantizando su inocuidad y su adecuada conservación en el marco de la normativa internacional aplicable.

En 8.1 Nombre del Producto:

8.1.3 El nombre comercial, la especie o el cultivar pueden ~~[deben]~~ incluirse en la etiqueta.

Se apoya el uso del texto "pueden" en el 8.1.3 y, se elimina el texto "deben".

Justificación sobre el 8.1.3

La Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1985) no establece la obligación de declarar la especie o el cultivar como parte del nombre del alimento; al mismo tiempo, tampoco restringe su inclusión cuando el operador lo considere pertinente.

En este contexto, hacer obligatoria dicha declaración podría generar cargas logísticas y económicas adicionales para los fabricantes, ya que implicaría la necesidad de implementar infraestructura y capacitación técnica para respaldar la verificación botánica, lo que se traduciría en un incremento de los costos operacionales.

Por lo tanto, El Salvador considera pertinente que la declaración de la especie o cultivar sea una opción voluntaria para el fabricante, quien podrá elegir declarar el nombre comercial, la especie o el cultivar, según corresponda. Esto permitirá a los operadores económicos utilizar dicha información como un elemento de diferenciación comercial o de transparencia hacia los consumidores, sin que se convierta en un requisito obligatorio.

En 8.2 País de origen y país de cosecha

8.2.2 País de cosecha (opcional) ~~[obligatorio]~~

Se apoya el texto "opcional" y se elimina el texto "obligatorio"

Justificación sobre el 8.2.2

Conforme a lo establecido en la Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1985), el país de origen se define como aquel en el que se procesa un alimento. Asimismo, cuando un producto es sometido en un segundo país a un proceso de elaboración que modifique su naturaleza, este último deberá considerarse como el país de origen a efectos de etiquetado.

En concordancia, dicha norma establece la obligatoriedad de declarar en la etiqueta del producto el país de origen, lo cual cumple con la función de identificar el lugar donde se llevó a cabo el proceso que determina la naturaleza del alimento y permite garantizar la trazabilidad del producto.

En este contexto, la incorporación obligatoria de la declaración de país de cosecha podría generar confusión o duplicidad de información respecto a lo ya dispuesto en la normativa internacional vigente, sin aportar valor agregado adicional en términos de trazabilidad o protección del consumidor.

Adicionalmente, ante una eventualidad de inocuidad de los alimentos en la que se constate un peligro por parte del país importador, la verificación puede realizarse mediante la información relativa al fabricante y al país de origen del producto. Tomando en cuenta que de acuerdo con los Principios Generales de Higiene de los Alimentos (CXC 1-1969), debe garantizarse la existencia de controles y registros adecuados de las materias primas, de modo que se asegure la trazabilidad y la gestión oportuna de riesgos en la cadena alimentaria.

Por lo tanto, El Salvador considera pertinente que la declaración del país de cosecha sea clasificada como un elemento facultativo en el proyecto de norma de vainilla. Ello asegurará coherencia regulatoria con los textos generales del Codex, evitará inconsistencias en el etiquetado y, al mismo tiempo, permitirá que los operadores económicos lo incluyan de manera voluntaria cuando represente un factor de diferenciación comercial o de transparencia hacia los consumidores.

En [OPCIÓN 3 – Cuadro A1. Una nueva propuesta del GTe para su consideración por parte del Comité].

Se selecciona la opción 3, solicitando eliminar el termino [caviar de vainilla] por el texto “pulpa y semillas de vainilla” en dicho cuadro.

Justificación técnica:

El Cuadro A1 Opción 1 resulta insuficiente al no incorporar la variabilidad de las características químicas inherentes a las diversas especies botánicas de vainilla. El Cuadro A1 Opción 2 crea automáticamente una obligación de etiquetado al vincular la evaluación química del producto (su conformidad) a la declaración explícita de la especie botánica en el nombre.

La Opción 3 se presenta como la solución más equilibrada, ya que engloba de manera integral las características químicas esenciales para el producto (ej. contenido de vainillina) sin imponer una restricción automática a la declaración de la especie. Además, permite la evaluación y comercialización de aquellos productos cuyas especificaciones puedan encontrarse ligeramente fuera del rango promedio de las especies principales.

Se propone de igual manera eliminar el caviar de vainilla.

The European Union

Mixed Competence

Member States Vote

The European Union and its Member States (EUMS) would like to thank the United States of America, India, Madagascar and Mexico for updating the draft **Standard draft standard for dried or dehydrated fruits and berries – requirements for vanilla**, and would like to submit the following comments.

For background information, please refer to CX/SCH 25/8/3.

DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES - REQUIREMENTS FOR VANILLA

(at Step 6)

1. SCOPE

This standard applies dried or dehydrated fruits and berries – vanilla (cured vanilla beans) as defined in Section 2.1 below, and offered for direct human consumption, as an ingredient in food processing or for repackaging if required. ~~This standard does not apply to these products when intended for industrial processing.~~

2. DESCRIPTION

2.1 Product definition

Dried or dehydrated vanilla beans belonging to the species listed in Table 1:

Table 1: Variety of dried or dehydrated fruits and berries – vanilla covered by this standard.

Common name	Trade names	Scientific name
Vanilla	Pompona vanilla	<i>Vanilla pompona</i> Schiede (Orchidaceae)
	Vanilla Mexican vanilla	<i>Vanilla planifolia</i> Andrews (Orchidaceae)
	Bourbon vanilla	(syn. <i>V. fragrans</i> (Salis.) Ames)
	Planifolia vanilla	
	Vanilla-odorata	<i>Vanilla odorata</i> C. Presl (Orchidaceae)
	Tahitian vanilla	<i>Vanilla x tahitensis</i> J.W. Moore (Orchidaceae)
	Maya vanilla	<i>Vanilla cribbiana</i> Soto Arenas (Orchidaceae)

2.2 Styles

The EUMS do not agree with the term “vanilla caviar”, and suggest having only the designation “vanilla pulp and seeds” in the 4th bullet:

- **vanilla pulp and seeds.**

Rationale:

- The word “caviar” is defined in the Codex standard for sturgeon caviar (CXS 291-2010) as “*the product made from fish eggs of the Acipenseridae family by treating with food grade salt*”.
- The association of “caviar” with another designation, such as “vanilla caviar” is neither precise, nor clear or easily understandable by the consumer and should be avoided.

The EUMS propose the following definition:

- “Ground/powdered – **obtained by grinding vanilla beans (whole or split) after drying.**”

Rationale:

- In accordance with ISO 5565-1 (Vanilla [Vanilla fragrans (Salisbury) Ames] — Part 1: Specification) and ISO 3493 (Vanilla – Vocabulary), vanilla powder is defined as “obtained by grinding vanilla pods after drying without additives,” whereby “vanilla pods” denotes whole pods, which may be split. The standards provide no reference to the use of cut vanilla.
- Ongoing revisions to ISO 5565-1 propose replacing the term “pod” with “beans.” The proposal would ensure alignment with the anticipated ISO 5565-1 standard.

Dried or dehydrated vanilla may be:

- whole beans or complete beans with seeds and pulp inside;
- splits – beans that are naturally split;
- cut – short vanilla beans of varying lengths;
- vanilla pulp and seeds or [vanilla-caviar] [Vanilla Supreme] – comprising of vanilla pulp and seeds; or
- [ground/powdered – derived from ground whole, cut, and split beans;]
- [ground – derived from whole, cut, and split beans – may or may not be free-flowing;] and/or?
- [powdered – derived from whole, cut, and split beans – in free-flowing form].
- Other styles distinctly different for those [five or six] are allowed, provided they are labeled accordingly.

2.3 Sizing (optional)

Vanilla may be sized whole or cut when appropriate, in accordance with existing trade practices. When sized, the size designation and the method used shall be indicated on the package.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Composition

Vanilla as described in Section 2 above shall conform to the requirements contained in Annex 1, Table A1: Chemical characteristics and Table A2: Physical characteristics of vanilla.

3.2 Quality Factors

The EUMS suggest including a subpoint according to the template:

“General

Vanilla shall be safe and suitable for human consumption.”

3.2.1 Odour, flavour, and colour

The product shall have a characteristic odour, flavour, and colour, which can vary depending on geo-climatic factors and conditions, and shall be free from any foreign odour, flavour and colour especially from rancidity and mustiness. Vanilla beans' colour ranges from reddish to shiny black (oily black).

3.2.2 Chemical and physical characteristics

Vanilla beans as described in Section 2.1 shall comply with the requirements specified in Annex 1. (Table A1: Chemical Characteristics and Table 2: Physical characteristics of vanilla). The defects allowed must not affect the general appearance of the product as regards its quality, keeping quality and presentation in the package.

3.2.3 Classification (optional)

If traded as classified, the provisions in Annex I shall apply as minimum requirements.

If option 2 of table A1 was selected, the EUMS suggest the following wording:

“If traded as unclassified, the provisions grade whole III in Annex I shall apply as the minimum requirements to *Vanilla planifolia*.”

4. FOOD ADDITIVES

[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.]

The EUMS do not support the sentence in brackets and suggests deleting and replacing by “**No food additives are permitted in the products covered by this standard.**”

Rationale:

- This provision will impede unfair practices such as increasing the weight of spice with various fillers (food fraud/adulteration).
- In ISO 5565-1 standard, “vanilla powder” reads as follows: “obtained by grinding vanilla pods after drying without additives”.
- Vanilla is a product with high added value, from which the consumer legitimately expects a raw product, without additives.
- If the industrial process is carried out correctly, the use of anti-caking agents is not essential.
- To be consistent with other standards, e.g. saffron.

5. CONTAMINANTS

The products covered by this standard shall comply with the maximum levels specified in the *General standard for contaminants and toxins in food and feed* (CXS 193-1995) and shall be produced in accordance with the *Code of practice for the prevention and reduction of mycotoxins in spices* (CXC 78-2017) and other relevant Codex Alimentarius texts.

The products covered by this standard shall comply with the maximum residue limits for pesticides established by the Codex Alimentarius Commission.

6. HYGIENE

It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the *General principles of food hygiene* (CXC 1-1969),

Code of hygienic practice for low-moisture foods (CXC 75-2015), Annex on spices and dried culinary herbs (Annex III), and other relevant Codex Alimentarius texts.

The products should comply with any microbiological criteria established in accordance with the *Principles for the establishment and application of microbiological criteria for foods* (CXG 21-1997).

7. WEIGHTS AND MEASURES

Containers shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.

8. LABELLING

The products covered by the provisions of this standard shall be labelled in accordance with the *General standard for the labelling of pre-packaged foods* (CXS 1-1985). In addition, the following specific provisions apply:

8.1 Name of the product

8.1.1 The name of the product shall be as described in Section 2.1

The EUMS suggest that either “the common name” should be specified on 8.1.1 or the whole sentence is removed:

“8.1.1 The name of the product shall be **the common name** as described in Section 2.1”

Rationale:

Unclear what is exactly meant here. Do we refer only to the common name as the trade name and the scientific name are referred to in 8.1.3?

Also, according to the Codex General Standard on the Labelling of Prepackaged Foods (GSLPF), the indication of the name of the food/product is mandatory and this section is in addition to the GSLPF. The sentence would therefore be redundant.

If the sentence is kept, does this mean that the common name referred to in table 1 shall be name of the product? If yes, this should be specified here.

8.1.2 The name of the product may include an indication of the style as described in Section 2.2.

The EUMS suggest deleting ‘may’ and inserting ‘shall’:

“8.1.2 The name of the product **shall** ~~may~~ include an indication of the style as described in Section 2.2”

Rationale:

According to the GSLPF, the nature and physical condition has to be indicated where necessary to avoid misleading or confusing the consumer.

Furthermore, to be in line with the wording of the other proposed standard (marjoram).

8.1.3 Trade name, species, or cultivar may **[shall]** be listed on the label.

The EUMS suggest the following wording for 8.1.3:

“The trade name shall be indicated. In addition, the scientific name, as described in Section 2.1, may be indicated.”

Rationale:

- “Listed” seems not to be the most appropriate word and could be replaced by “indicated” to make the sentence read better.
- Other sections like in 8.2.1 do not mention «on the label». Why should it be specified here? In addition, it seems to be redundant as we are under the labelling section.
- The cultivar is not referred to in Section 2.1, therefore we should be consistent throughout the standard.
- The EUMS support the **mandatory indication of the trade name**, and the voluntary indication of the scientific name as the various vanilla varieties have different characteristics and consumers

should be informed on the vanilla variety/species they are acquiring. This is why the EUMS support **option 2 of the chemical characteristic table**, which breaks down the parameters by species.

8.2 Country of origin and country of harvest

8.2.1 Country of origin shall be declared.

The EUMS suggest the following wording for 8.2.1:

"~~The~~ country of origin shall be ~~declared~~ indicated"

Rationale:

"Declared" seems not to be the most appropriate word and could be replaced by "indicated" to make the sentence read better.

8.2.2 Country of harvest (optional) **[mandatory]**

The EUMS suggest the following:

8.2.2 The country of harvest (optional), however it shall be indicated when vanilla undergoes processes that change its nature in countries other than those where it was harvested.

Rationale:

- In the case of saffron, the country of "origin" shall always correspond to the country of "harvest". However, for vanilla, the situation might not be the same, as this spice can undergo processes that change its nature, in countries other than those where it was harvested. Only in such cases, the declaration of the country of harvest, in addition to the country of origin, should be mandatory.
- All spice standards include the country of harvest, offering the flexibility to make its labelling optional or mandatory. This shows that the concept of the country of harvest is well understood and should be mandatory in those standards and circumstances where there is valid reason to do so.

8.2.3 Region of harvest and year of harvest (optional)

8.3 Commercial identification

- style;
- class/grade, if applicable; and
- size (optional).

8.4 Labelling of non-retail containers

The labelling of non-retail containers should be in accordance with the *General standard for the labelling of non-retail containers of foods* (CXS 346-2021).

9 METHODS OF ANALYSIS AND SAMPLING

9.2 Methods of analysis¹

See Annex 2 Table A3:Methods of analysis for vanilla.

9.3 Sampling plan

To be developed.

¹ The methods of analysis will be included in CXS 234- 1999 after endorsement by CCMAS and the following text shall replace Annex II Table X1:

"For checking the compliance with this standard, the methods of analysis and sampling contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used"

Annex 1

Chemical and physical characteristics and methods of analysis for vanilla

[Option 1.] Table A1: Chemical characteristics of vanilla per style

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

The EUMS support option 2. However, the names should be the same as those on table 1.

Additionally, the EUMS propose to keep the vanillin content on wet basis at 1.8% for the extra class

The term «min» or «minimum» should be added on the vanillin content column and «min – max» should be added on the moisture content column.

In addition, the nomenclature of the style “vanilla caviar” should be replaced according to the EUMS comments made to para 2.2.

Rationale:

To ensure fair trading practices, the first step is to be specific about the product being traded. Species information provides crucial information on the characteristics of the product. Indeed, the different species do not have the same chemical characteristic profiles.

More specifically:

- *Vanilla planifolia* and *V. tahitensis* represent the two main products currently traded globally. Their chemical specifications differ significantly, so their presentation should be separate.
- Quality classes are used within the profession in commercial exchanges to define the quality of their pods and therefore define the price. It is then important to define this reference in the standard.

Indonesia's proposal of 1.2% vanillin on wet basis for the extra class for *Vanilla planifolia* seems to be too low. 1.2% on vanillin content represent the limit of an acceptable vanilla pod. The current ISO 5565-1 demands a minimum of 1.6%. Then, according to the Indonesian proposal, the extra class at 1.2% is much less than the ISO minimum.

The extra class corresponds to the « gourmet » class, already used in the vanilla commercial exchanges. The extra class is made to defend the quality of the product. It also defines the price of the product; thus, it should not be too permissive.

Option 2. Table A1. Chemical characteristics for vanilla per species

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
<i>Vanilla planifolia</i>	Whole: Extra	35 - 38	1.8	1,2	2,97	1,48
	Whole: class I	30 - 36	1.6	1,1		
	Whole: class II	25 - 30	1.4	1,1		
	Whole: class III	15 - 25	1.2	1,0		
	Split	15 - 25	1.2	1,0		
	Cut	10-25	1	0,8	1,62	0,88
	Ground/ powdered	<15	1	0,9	0,8	0,43
	Vanilla-caviar	25 - 35	1	0,7	2,37	0,04
<i>Vanilla odorata</i>	Whole	15 - 35	2			
	Split	15 - 25	2			
	Cut	15-20	1.4			
	Ground/ powdered	<15	1.4			
	Vanilla-caviar	25 - 30	1			
<i>Vanilla x tahitensis</i>	Whole	30 - 55	0.3			
	Cut	15 - 55	0.3			
	Ground/powdered	10 - 45	0.3			
	Vanilla-caviar	15 - 55	0.3			
<i>Vanilla cribbiana</i>	Whole	15 - 38	1.4			
	Split	15 - 25	1.4			
	Cut	10 - 25	0.7			
	Ground/ powdered	<15	0.5			
	Vanilla-caviar	25 - 35	1			
<i>Vanilla pompona</i>	Whole	20 - 40	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/100g
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 55Except 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**Table A2. Physical characteristics of vanilla**

The EUMS suggest including a footnote for “extraneous matter” – as it is included under table A3 (which should be deleted), and a footnote explaining the “Colour tolerance”.

Product Name	Form/Style	Extraneous matter ** % w/w (max)	Live insect count/100g (max)	[Other Factors]
				Color Tolerance ***% w/w (max)
Vanilla	Whole	1	0	7.0
	Split	1	0	7.0
	Cut	1	0	7.0
	Ground/powdered*	1 [N/A]	0	N/A
	[Vanilla-caviar]	1 [N/A]	0	N/A

Notes:

* [The particle size of ground/powdered styles is determined by contractual agreement between buyer and seller. N/A Not applicable, means that this form of the above product has not been evaluated for this provision, and currently there are no values. N/A does not refer to zero.

** Vegetative matter associated with the plant from which the product originates but is not accepted as part of the final product.

*** A footnote should be considered explaining the colour tolerance

Annex 1

Table A3: Methods of analysis for vanilla

The EUMS suggest the amendments as per the track changes in the table below:

Spices	Provision	Method*,**	Principles	Type
Vanilla	Moisture Content	ISO 5565-2	Distillation	I
	Extraneous matter***	ISO 927	Visual examination followed by Gravimetry	I
	Live Insect	ISO 927	Visual examination (counting)	I
	Insect fragments	AOAC 975.49	Flotation method	I
	Vanillin Content on wet basis	ISO 5565-2 / AOAC 990.25	Extraction followed by HPLC-UV analysis or Extraction followed by UV Spectrophotometry	II
	Total ash on dry basis	ISO 939 and ISO 928	Distillation and Gravimetry.	I
	Acid insoluble ash on dry basis	ISO 939 and ISO 930	Distillation and Gravimetry.	I
	[colour]	[ISO 11037:2011] [Munsell Colour Chart]	Sensory Analysis Visual	I I

Notes: Latest edition or version of the approved method should be used.

* According to the definition of “types of method of analysis” as per Codex Procedural Manual Section II.

** The methods of analysis will be included in CXS 234-1999 after endorsement by CCMAS and the following text replaces the Table.

“For checking the compliance with this standard, the methods of analysis and sampling contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.”.

*** ~~Vegetative matter associated with the plant from which the product originates but is not accepted as part of the final product.~~

[Note: The methods for Insect fragments, Total ash, and Acid insoluble ash are deleted because they are not included in the chemical and physical characteristics provisions.]

Ghana

General comment

Ghana appreciates the opportunity to provide comments on the proposed Draft Standard for Spices Derived from Dried or Dehydrated Fruits and Berries—Requirements for Vanilla. We wish to thank the chair and members of the eWG for the extensive work done on the draft standard.

1. Scope

We propose that the last sentence be revised to read:

“It excludes the product for industrial processing.”

Rationale:

The proposal is to ensure consistency in language with existing standards, as the text in its current form may cause confusion.

2.2 Styles

We agree with the EWG chair’s recommendations to:

- i. Retain the name “vanilla-caviar” as an alternate name for vanilla pulp and seeds.
- ii. Divide the combined ground/powdered style into two distinct styles – bringing the number of styles to 6.

We recommend the removal of all the square brackets.

4. FOOD ADDITIVES

We support the allowance of anti-caking agents in vanilla, however should apply to the powdered style and not the ground as proposed.

Rationale:

The “powdered” style is expected to flow freely unlike the ground style which may be paste-like.

Name of the product

Section 8.1.3 Ghana supports the use of "shall" in the text for the indication of the trade name on the label.

In the alternative, the heading of Table 1; “Common and Trade Name,” should be interchanged to make the presentation of trade name on label optional.

Rationale

Although trade names are not mandatory in labeling, Table 1 in section 2.1 on the product definition shows that trade names differentiate the varieties of vanilla. For informed decision making by the consumer, the consumer should know the type of vanilla being purchased.

Chemical and physical characteristics and methods of analysis for vanilla

Ghana supports option 3 for table A1. We, however, propose the removal of “max” for the moisture content.

Rationale:

The proposed figures are in ranges.

Philippines

Comments at Step 6/7 in reply to CL 2025/51-SCH

Comment Type	Category	Proposed Change	Rationale/Comment
General	Substantiative	N/A	<p>The Philippines supports the recommendations on the draft standard.</p> <p>Rationale:</p> <p>The distinction of ground and powdered styles can be scientifically supported through the established moisture content levels across the styles and the vanilla varieties. This can also help in the justification of use of food additives for the powdered style vanilla to keep its free-flowing state.</p> <p>The voluntary declaration of trade name, species, or cultivar, and the voluntary declaration of the country of harvest would entail further scientific studies to support and standardize methods for correlating, fingerprinting, verification and validation of the declared information. Capability of trading countries to perform the required information validation imposes additional cost and challenge.</p> <p>The Option 3 in the Annex 1 for the Chemical Characteristics would require values for the ground style and powdered style, if distinction between the two styles will be adopted. if distinction between the two styles will be adopted.</p>

Comment Type	Category	Proposed Change	Rationale/Comment
Specific Whole document	Editorial	Use the word ‘style’ in the entire texts if referring to the styles listed in Sec. 2.2. instead of interchangeably using the ‘form’ and ‘style’	For improvement and consistency of understanding in the document.

2.2 Styles	Editorial	Ground – derived from whole, cut and/or split beans – may or may not be free-flowing	To clearly state that the ‘cut’ form and ‘split’ form of the beans are independent and may be used for each style.
	Substantive	Powdered – derived from whole, cut and/or split beans – in free-flowing form	Separate declaration of “ground” and “powdered” allows for distinction and specific indication of the true nature of the product
8.2.3 Trade name, species, or cultivar may [shall] be listed on the label.	Substantive	Trade name, species, or cultivar may be listed on the label.	Making the declaration of these information voluntarily lessens the regulatory burden, especially for labels with limited space.
8.3.2 Country of harvest(optional) [mandatory]	Substantive	Country of harvest may be declared (optional)	To include “may be declared” for consistency with other draft standards; making the declaration of the country of harvest optional lessens the regulatory burden on verification and labeling, especially for labels with limited space.

Thailand

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

1. Section 2.2 Styles

We have no objection to the term "vanilla caviar". The term "vanilla supreme," however, should be removed because it is unclear and seems to be related to the classification. In addition, we support dividing the "ground/powdered" into two styles: "ground" and "powdered". This is due to differences in characteristics and moisture content.

2. Annex 1 Table A1: Chemical characteristics

We would like to support option 3 and provide more editorial comment as follows:

- The style “Vanilla-caviar” should be replaced with “Vanilla pulp and seeds (Vanilla-caviar),” which will comply with the section styles.

3. Annex 1 Table A2: Physical characteristics

3.1 We would like to propose dividing the "ground/powdered" into two styles: "ground" and "powdered." This is because it would correspond to the comment in section "2.2 styles" above.

3.2 The style “Vanilla-caviar” should be replaced with “Vanilla pulp and seeds (Vanilla-caviar),” which will comply with the section styles.