

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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**Agenda Item 4.1**

**SCH08/CRD11**

**Original Language Only**

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

### Eighth Session

### DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED BARKS REQUIREMENTS FOR CINNAMON

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

#### El Salvador

#### **Tema 4.1 PROYECTO DE NORMA PARA ESPECIAS DERIVADAS DE CORTEZAS DESECADAS O DESHIDRATADAS – CANELA (EN EL TRÁMITE 3/4)**

##### **Comentarios generales:**

El Salvador agradece el trabajo realizado por el grupo de trabajo por medios electrónicos presidido por Brasil y copresidido por Indonesia, República Islámica de Irán y México.

Se ha analizado el Apéndice 1 Proyecto de norma para especias derivadas de cortezas desecadas o deshidratadas -Canela y 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 2.1 Definición del producto**

La canela es un producto obtenido de la corteza desecada o deshidratada **[pelada o sin pelar]** de las especias enumeradas en el Cuadro 1

Se apoya ambos textos del corchete “pelada o sin pelar”.

##### **Justificación sobre 2.1:**

Existen prácticas diferenciadas según la especie de canela y el destino comercial.

La canela de Ceilán (*C. zeylanicum/verum*) suele pelarse (retirando la corteza externa rugosa) para lograr un producto más fino, con mejor aroma, color más claro y sin asperezas, lo que responde a criterios sensoriales y de calidad premium.

En cambio, las variedades de Cassia (*C. cassia*, *C. burmannii*, *C. loureirii*) muchas veces se comercializan con corteza exterior sin pelar, porque ello reduce costos de procesamiento y mantiene rendimientos más altos, aun cuando sensorialmente son más ásperas y con mayor contenido de cumarina.

La diferenciación “pelada o sin pelar” permitiría reflejar ambas prácticas sin excluir ninguna tradición comercial ni limitar la diversidad de presentaciones en el mercado internacional.

Lo anterior permite distinguir prácticas tradicionales de calidad (ej. canela pelada por atributos sensoriales), así también evita ambigüedades regulatorias que podrían generar barreras comerciales o rechazo de lotes y facilita identificar con mayor precisión el tipo de canela que se somete a autorización comercial, por ejemplo.

##### **[Opción 3: Cuadro 1: Especies de la canela reguladas por esta norma]**

Esta opción con un nuevo formato refleja los debates sobre el texto de la Opción 1, tal como fue presentado por el copresidente México.

Se apoya la opción 3

##### **Justificación sobre el Cuadro 1 opción 3:**

Se propone modificación a la propuesta realizada por el co-presidente de México respecto al Cuadro 1, debido a que la información ha sido organizada de manera más detallada y estructurada, lo que permite una visualización más clara, precisa y uniforme. La propuesta opción 3 del cuadro mejora significativamente la identificación de los productos al contemplar de manera sistemática su nombre científico, su nombre común y el tipo o denominación comercial lo cual facilita la interpretación, comparación y aplicación de la normativa.

En los siguientes numerales del apéndice 1 se propone texto agregado en negrita y se elimina texto de dicha sección que se encuentra tachado a continuación:

#### En 2.2 Formas de presentación:

La canela puede ser:

- en trozos/cortada/ partida/fragmentada: Trozos de corteza de distintas formas y tamaños **que** ~~(pueden estar enrollados o sin enrollar).~~
- molida o en polvo: ~~{el tamaño de las partículas~~ **deberá determinarse** ~~se determinará~~ mediante acuerdo ~~contractual~~ entre el comprador y el vendedor.
- Se permitirán otras formas de presentación ~~distintamente diferentes~~ de las tres formas mencionadas, siempre que estén debidamente etiquetadas **y denominadas como tal, en cumplimiento a lo establecido en la sección 3.1 y 3.2 de la Norma general para el etiquetado de los alimentos preenvasados.**

#### En 3.2.2 Olor, sabor y color:

...Debe tener olor y sabor característicos en función de los factores **y** condiciones geo climáticos, ...

#### En 3.2.3 Clasificación (opcional):

...se comercializa siguiendo una clasificación o con categoría asignada, **se aplicarán los parámetros establecidos** ~~las disposiciones del~~ en el Anexo 1 (Cuadro A1...

#### En 8.1.3 El nombre científico del producto **es (opcional).**

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#### En 8.1.4 El nombre comercial, el tipo o el cultivar pueden incluirse en la etiqueta.

Se apoya el texto del numeral 8.1.4.

#### Justificación técnica:

En el caso de productos agrícolas o alimentos derivados, la inclusión del cultivar en la denominación puede proporcionar información técnica relevante, ya que permite identificar características específicas relacionadas con su presentación, sabor o uso particular. Un cultivar se define como una o varias plantas seleccionadas por poseer atributos deseables, los cuales pueden ser reproducidos de manera estable mediante propagación.

De acuerdo con el Código Internacional de Nomenclatura para Plantas Cultivadas (ICNCP, 2004), la denominación de un cultivar debe estar compuesta por el nombre correcto del género seguido del epíteto correspondiente, lo que garantiza uniformidad, precisión y claridad en la identificación.

#### En 8.2 País de origen y país de cosecha:

País de cosecha [por desarrollar].

#### Se presenta comentarios respecto al 8.2:

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 canela. 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.

#### **8.4 Peso neto (opcional).**

No se apoya que el peso neto sea opcional eliminando este texto del 8.4

#### **Justificación técnica sobre 8.4:**

De conformidad con lo establecido en la Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1995), en su numeral 4, relativo a los requisitos de etiquetado obligatorio, se señala en el apartado 4.3 que la declaración del contenido neto y, cuando corresponda, del peso escurrido, constituye un requisito de carácter obligatorio.

En este sentido, establecer en el proyecto de norma que dicho requisito sea de carácter opcional representaría una contradicción frente a la normativa internacional vigente, la cual dispone expresamente su obligatoriedad. Esta situación podría generar una ambigüedad normativa.

Lo anterior reviste especial importancia, ya que la declaración del contenido neto es un elemento esencial para la transparencia y veracidad del etiquetado, permitiendo al consumidor conocer con claridad la cantidad real de producto contenido en el envase. Su omisión o la posibilidad de consignarlo de manera opcional, podría dar lugar a prácticas de etiquetado que induzcan a error o dificulten la comparabilidad entre productos en el mercado.

#### **En el Anexo 1 [Opción 2 Cuadro A1: Características químicas de la canela.]**

En atención a la propuesta presentada por el copresidente de México, El Salvador manifiesta su respaldo, considerando que la opción 2 contempla la inclusión de cumarina en todas las formas de presentación del producto.

#### **The European Union**

#### **Mixed Competence**

#### **Member States Vote**

The European Union and its Member States (EUMS) would like to thank Brazil, Indonesia, Iran and Mexico for updating the draft **Standard for spices in the form of dried barks – requirements for cinnamon**, and would like to submit the following comments.

**For background information, please refer to CX/SCH 25/8/5.**

DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED BARK - CINNAMON

(at Step 3/4)

#### **1. SCOPE**

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.

#### **2. DESCRIPTION**

##### **2.1. Product definition**

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

The EUMS prefer option 2.

[Option 1: Table 1: Species of cinnamon covered by this standard]

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,	[True cinnamon]	[ <i>Cinnamomum zeylanicum</i> Syn.: <i>Cinnamomum verum</i> ]

Indian type and Madagascar type) [Cinnamon]		
[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 burmanii, [Indonesian cinnamon]	<i>Cinnamomum burmannii</i>
Vietnamese cinnamon [Cinnamon]	Saigon cassia	<i>Cinnamomum loureirii</i>

**[Option 2: Table 1: Species of cinnamon covered by this standard]**

*This option with a new format reflects the discussions about the content of Option 1, as presented by the cochair Mexico*

Product <u>name</u>	Common name	Trade name/type	Scientific name
CINNAMMON	Ceylan cinnammon	Indian type	<i>Cinnamomum zeylanicum</i> Syn.; <i>Cinnamomum verum</i>
		Madagascar type	
		Seychelles type	
		Sri Lanka type	
	Cassia cinnammon	Chinese type	<i>Cinnamomum cassia</i>
		Indonesia type,	<i>Cinnamomum burmannii</i>
		<u>Burmanii type</u>	
		<u>Korintje type</u>	
		<u>Padang Cassia type</u>	
		Saigon or Vietnamese type	<i>Cinnamomum loureirii</i>

## 2.2. Styles

The EUMS suggest adding the following definition to "**ground/powdered**": **powder obtained by grinding cinnamon of the types considered in this standard**".

Rationale:

This is based on the definitions given in ISO 6539 and in ISO 6538

Cinnamon may be:

- 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.
  - pieces/cut/cracked/broken: Pieces of bark of various shapes and sizes (they may be curled or uncurled).
  - ground/powdered (particle size to be determined by contractual agreement between buyer and seller).

Other styles distinctly different from those three are allowed, provided they are labelled accordingly.

## 2.3. Sizing (optional)

Whole/stick/quills cinnamon may be sized by count, per weight, a combination of length and diameter or in accordance with pre-existing trade practice. When sized, the methods used should be labelled on the package.

### 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

#### 3.1. Composition

Cinnamon as defined in Section 2.1 shall conform to the requirements contained in Annex.

#### 3.2. Quality Factors

##### 3.2.1. General

Cinnamon shall be safe and suitable for human consumption. It shall be free from live insects and practically free from extraneous and foreign matter.

##### 3.2.2. Odour, flavour, and colour

Cinnamon indicated in section 2.1 shall be free from any foreign odour or flavor, especially from mustiness. It shall have the individual characteristic odour and flavor considering the geo-climatic factor / conditions, types and the main chemical components of the volatile oil indicated in Annex 1, Table A1: Chemical characteristics of cinnamon. Cinnamon colour ranges from reddish, light brown, brown or dark brown.

##### 3.2.3. Classification (optional)

When cinnamon as described in Section 2.1 are traded as classified/graded, the provisions in Annex 1 (Table 1 – Chemical Characteristics and Table A2: Physical characteristics of cinnamon) shall apply as the minimum requirements.

##### 3.2.4. Chemical and physical characteristics

Cinnamon as described in Section 2.1 shall comply with the requirements specified in Annex 1, Table A1: Chemical characteristics of cinnamon and Table A2: Physical characteristics of cinnamon). The defects allowed must not affect the general appearance of the product as regards its quality, keeping quality and presentation in the package.

### 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 cinnamon.

The EUMS are not aware that anticaking agents are used for ground/powdered form of cinnamon. Furthermore, according to ISO 6539, ground cinnamon reads as follows: "Powder obtained by grinding cinnamon of the types considered in this International Standard, excluding all additives." Thus, the EU would suggest justifying why anticaking agents are needed. It should be considered to include a provision that "**no food additives are permitted in the products covered by this standard.**"

### 5. CONTAMINANTS

The products covered by this standard shall comply with the maximum levels of the *General standard for contaminants and toxins in food and feed* (CXS 193-1995), 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. FOOD 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 III, and other relevant Codex Alimentarius texts.

The products should comply with any microbiological criteria established in accordance with the *Principles and guidelines for the establishment and application of microbiological criteria related to 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: Product definition.

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

E.g. “The name of the product shall be the **‘common name’**, as described in Section 2.1: ~~Product definition.~~

### Rationale:

Paragraph 8.1.1 is not clear as is.

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: Styles.

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: Styles”:

### 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. The scientific name of the product is optional.

The EUMS suggest the following wording for 8.1.3:

**“The scientific name may be indicated”.**

### Rational:

To be consistent with other standards.

8.1.4. Trade name, type or cultivar may be listed on the label.

The EUMS suggest the following wording for 8.1.4:

**“The trade name may be indicated”.**

However, we would rather suggest merging paragraphs 8.1.3 and 8.1.4 (as in the other proposed draft standards) as follows:

**“The trade name and the scientific name, as described in Section 2.1, may be indicated.”**

### Rationale:

The terms used here e.g. type or cultivar are not mentioned on table 1 of Section 2.1. To prevent confusion and misunderstandings, the terminology should be consistent throughout the standard.

“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.

## 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 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 [to be developed].

The EUMS suggest the following wording:

Country of harvest (optional).

**8.2.3.** Region of harvest and year of harvest **may be declared** (optional).

The EUMS suggest the following wording:

Region of harvest and year of harvest (optional).

Rational: to be consistent with the 2 latest standards adopted (turmeric and all spices)

**8.3. Commercial identification**

Commercial identification shall be based on:

style;

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

**8.4. Net weight (optional).****8.5. 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****9.1.. Methods of analysis**

The methods of analysis highlighted under Annex II will be included in CXS 234-1999 after endorsement by CCMAS and the following text will replace the table and will be inserted.

“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)<sup>9</sup> relevant to the provisions in this standard, shall be used.”

**9.2. Sampling plan**

To be developed.

[Option 1: Table A1: Chemical characteristics of cinnamon.]

The EUMS prefer option 1, as it clearly distinguishes between the different types, however it should be adapted to 2.1 Table 1.

The EUMS note that ISO 6538 and 6539 break down the cinnamon species into different varieties, whereas option 1 Table is less granular and lists only genus and species.

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	[Cinnamaldehyde content ml/100 g (min) on dry basis]	[Coumarin content (% max) [mg/g]] [on dry basis]
<b><i>Cinnamomum zeylanicum</i></b>	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]
<b>“Cassia types”: <i>Cinnamomum cassia</i>; [<i>Cinnamomum burmannii</i>]; <i>Cinnamomum loureirii</i>)</b>	Whole/ Stick/ Quills	15.0 [14.0] [13.0]	5.0 [6.0]	1.5 [2.0]	1.0		
	Pieces/ Cut/ Cracked/ Broken	15.0 [14.0] [13.0]	5.0 [6.0]	1.5 [2.0]	1.0		
	Ground/ Powdered	14.0 [13.0]	5.0 [6.0]	1.5 [2.0]	[1.0]		
<b>[“Cassia types”: <i>Cinnamomum burmannii</i> ]</b>	[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]		

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.]



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

In case option 2 is kept, it should be considered to review the coumarin content, as for cassia type the coumarin content is higher than 0.3.

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/100g (min) on dry basis	[Cinnamaldehyde content ml/100g (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
	Ground/ Powdered	14.0	7.0 [5.0]	2.0 [1.5]	0.5 [1.2]	1.0	0.3

Table A2: Physical characteristics of Cinnamon.

The EUMS would suggest keeping the value at “0” for “Excreta mammalian” and for “Excreta, other”, as it was proposed by the first EWG consultation, and propose “0” for “Mould visible”.

Rationale:

This would be in line with the proposed point 3.2.1 “Cinnamon shall be safe and suitable for human consumption. It shall be free from live insects and practically free from extraneous and foreign matter.”, which the EU also agrees with. Furthermore, it would also be in line with point 6.3 “Freedom from moulds, insects, etc.” of ISO 6539 (Cinnamon, Sri Lankan type, Seychelles type and Madagascan type (*Cinnamomum zeylanicum* Blume) — Specification).

In addition, the EUMS propose the following:

Extraneous matter: 1.0 % w/w (in line with ISO 6538 and ISO 6539)

Foreign matter: 0.5 % w/w, excluding the ground/powdered form, for which it should be “N/A” for both extraneous matter and foreign matter consistent with other Codex standards (e.g., CXS 343-2021 on ginger, CXS 352-2022 on nutmeg, CXS 357-2024 on small cardamom)

Product	Form/ Style	Extraneous matter % w/w (max)	Foreign matter % w/w (max)	<del>[Mould damage]</del> [Mould visible] % w/w (max)	Dead whole in- sects count/100 g (max)	Insect damage % w/w (max)	Insect fragments count/10 g (max) - ground only	Live insects	Excreta mammalia n and /other mg/kg (max)	Excreta, other mg/kg (max)	Rodent filth count/ 25 g	[Off-size (when sized %]
<i>Cinnamomum spp.</i>	Whole/ Stick/ Quills	[0] [0.5] [1]	[0.5] [0]	[0] [1.0] [5.0]	[0] [2.0]	[0] [1.0]	NA	0	[0.0] [1.0] [2.0]	[0] [4.0]	NA	[10]
	Pieces/ Cut/ Cracked/ Broken	[0] [1.0] [0.5]	0 [0.5]	[0] [1.0] [5.0]	[0] [2.0] [3.0]	[0] [1.0]	NA	0	0 [2]	0 [NA]	NA	NA
	Ground/ Powdered	0 [1.0] [0.5] NA	0 [0.5] NA	[0] [1.0] [5.0]	NA [2]	NA	100/50 [20/10] [400/50]	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.]

## ANNEX II

Table A3. Methods of analysis for cinnamon (non-exhaustive list of provisions)

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

Provision	Method	Principle	Type
Moisture	<del>AOAC 986.24</del> ISO 939:2024	Distillation	I
Volatile oil (on dry basis)	AOAC 962.17 ASTA Method 16 ISO 939 and ISO 6571:2008	<u>Calculation from moisture and volatile oils,</u> <del>Distillation followed by volumetry</del> <u>distillation</u>	I
[Coumarin]	[Methanol extract]	[HPLC]	
Total ash (on dry basis)	<del>ISO 939:2024 and</del> ISO 928:1997	<del>[Distillation and gravimetry]</del> [Calculation from moisture and ash (at 550 °C), Distillation and gravimetry]	I
Acid insoluble ash (on dry basis)	<del>AOAC 941.12B [ISO 939:2024]</del> <del>ISO 928:1997 and ISO 930:1997</del>	<del>[Gravimetry]</del> [Calculation from moisture and ash (at 550 °C), Distillation and gravimetry]	I
Extraneous matter	<del>AOAC 968.38 b</del> ISO 927:2009 ASTA 14.1	Visual examination followed by <u>Gravimetry</u> <del>flotation</del>	I
Foreign matter	<del>AOAC 968.38 b</del> ISO 927:2009	Visual examination followed by <u>Gravimetry</u> <del>flotation</del>	I
Insect fragments, whole dead insects	AOAC 968.38 b [ISO 927:2009]	Visual examination followed by flotation	I
Whole dead insects	ISO 927	<u>Visual examination (counting)</u>	I
Mammalian and/or other excreta	MPM: V-8. Spices, Condiments, Flavors, and Crude Drugs (Macroanalytical Procedure Manual, FDA) <a href="http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm084394.htm#v-32">http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm084394.htm#v-32</a> <del>A. General Method for Spices, Herbs, and Botanicals (V 32)</del> <del>Version 1 May 1998</del>	Visual examination followed by gravimetry	IV
Visible mould	<del>MPM: V-8. Spices, Condiments, Flavors, and Crude Drugs A. General Method for Spices, Herbs, and Botanicals (V 32)</del> <del>Version 1 May 1998</del> [ISO 927:2009]	Visual examination followed by gravimetry	IV
Rodent filth	<del>AOAC 968.38 b [ISO 927:2009]</del>	<u>Visual examination followed by gravimetry</u> <del>Flotation</del>	I

## Ghana

### 2.1. Product definition

Ghana supports the retention of Peeled /Unpeeled in the product definition

#### Rationale:

Cinnamon is processed from the inner bark of the cinnamon tree by peeling and drying

**Table 1**

Ghana supports option 1 for the spices of cinnamon with the following modification:

Product	Common name	Trade name/s	Scientific name
Cinnamon	Chinese cinnamon	Chinese cassia	<i>Cinnamomum cassia</i> (Syn.: <i>Cinnamomum aromaticum</i> )
	Sri Lanka cinnamon	True cinnamon	<i>Cinnamomum zeylanicum</i>
	Seychelles cinnamon, Madagascar cinnamon and Indian cinnamon	Cinnamon	<i>Cinnamomum verum</i>
	Indonesian cinnamon	Koerintje	<i>Cinnamomum burmannii</i>
	Vietnamese cinnamon	Saigon cassia	<i>Cinnamomum loureirii</i>

### Chemical characteristics of cinnamon

Ghana supports option 2 for table A1 with stated figures as follows:

	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/100g (min) on dry basis	Cinnamaldehyde content ml/100g (min) on dry basis	Coumarin content basis] (% max)in mg/g) on dry basis
Cinnamon	Pieces/ Cut/ Cracked/ Broken	14	7	1.5	1	1.0	0.3
	Pieces/ Cut/ Cracked/ Broken	14	7	1.5	1	1.0	0.3
	Ground/ Powdered	14	7	1.5	0.5	1.0	0.3

### Physical characteristics of Cinnamon

Ghana supports Table A2 as follows:

Product	Form/style	Extraneous matter % w/w	Foreign matter % w/w	Mould visible % w/w	Dead whole insects count/100 g	Insect damage % w/w	Insect fragments count /10 g (max)	Live insects	Excreta mammalian and other	Excreta, other mg/kg (max)	Rodent filth count/ 25 g	Off-size (when sized)
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		(max)	(max)	(max)	(max)	(max)	ground only		mg/kg (max)			ed %
Cinnamon	Pieces/Cut/Cracked/Broken	0.5	0.5	1	0	1	N/A	0	0	0	N/A	10
	Pieces/Cut/Cracked/Broken	0.5	0.5	1	0	1	N/A	0	0	0	N/A	N/A
	Ground/Powdered	0.5	0.5	1	N/A	N/A	100/50	0	0	0	1/50	N/A

### Philippines

#### Comments at Step 3/4 in reply to CL 2025/53-SCH

Comment Type	Category	Proposed Change	Rationale/Comment
General	Substantiative	Retention of the cassia species in this standard.	More data regarding the chemical characteristics, composition especially coumarin and cinnamaldehyde levels should be considered to have a standardized/regulated consumption. This will also require a harmonized information about the chemical characteristics of the cinnamon across the species of interest.  Otherwise, specify in the title of the standard that this is only for the True Cinnamon or Ceylon Cinnamon.
Specific 8.2.2 Country of harvest [to be developed]	Substantiative	8.2.2 Country of harvest may be declared.	Voluntary declaration of 'Country of Harvest'.  The mandatory 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.

Reference: Carnibel, J.A.F and Samiano, F.B. (2017). Philippine Cinnamon: Important Lesser-Known Forest Resource. Forest Foundation Philippines and Department of Science and Technology – Forest Products Research and Development Institute (DOST-FPRDI), 8pp.

### Thailand

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

#### 1. Section 2.1 product definitions

We recommend using a standardized template for the SCH standard that only comprises the common name, trade name, and scientific name in the table. The suggestion for the table is as follows:

Common name	Trade name/Type	Scientific name
Cinnamon	Ceylon cinnamon Indian type Madagascar type Seychelles type Sri Lanka type	<i>Cinnamomum verum</i> (Syn: <i>Cinnamomum zeylanicum</i> )
	Cassia cinnamon Chinese type	<i>Cinnamomum aromaticum</i>
	Indonesian type Burmanii type Korintje type Padang Cassia type	<i>Cinnamomum burmannii</i>
	Saigon or Vietnamese type	<i>Cinnamomum loureiroi</i>

## 2. Annex 1 Table A1: Chemical characteristics

We would like to propose removing the Cinnamaldehyde and Coumarin parameters from table A1. This is because we believe that volatile oil analysis is sufficient for quality determination, preventing us from incurring unnecessary costs from additional analytical parameters.