

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
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Agenda Item 7.3

SCH08/CRD15  
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON SPICES AND CULINARY HERBS  
Eighth Session  
UPDATE TO THE TEMPLATES FOR SCH STANDARDS  
(Comments of the European Union, Kenya, Thailand)

The European Union

*Member States Competence*

*Member States Vote*

The Member States of the European Union (MSEU) would like to thank the United States of America for updating the Template for Spices and Culinary Herbs (SCH).

The MSEU would like to submit the following comments:

**1. SCOPE**

The wording of "A: Group standard" and "B: Individual standard" should be aligned as much as possible:

**A: Group standard:**

*This standard applies to spices or culinary herbs derived from dried or dehydrated {name of the group} as defined in Section 2.1 below, offered for direct human consumption, or as a food processing ingredient or for repackaging if required. The exact species bought/sold may be defined by contractual specifications. This standard does not apply to these products when intended for industrial processing.*

**B: Individual standard:**

*This standard applies to dried or dehydrated (SCH common or trade name) defined in Section 2.1 below, offered for direct human consumption, or as an **food processing** ingredient ~~in food processing~~ or for repackaging if required. This standard does not apply to [name of product] when intended for industrial processing.*

**2.2 Styles**

The typical colour characteristics should be described in 3.2.2 "Odour, flavour and colour". (e.g. the draft standards for large cardamon and coriander contain specific colour characteristics in 2.2, which should be considered to be moved to 3.2.2).

**2.3 Sizing (optional)**

The MSEU would like to seek for clarification, as to whether this requirement of adding the method is totally justified: "When sized, the methods used should be labelled on the package".

For example, if a producer labels its product "vanilla pods that it is 15 cm length and above", is it really necessary to indicate on the package how it was determined?

**3.2.1 General**

The MSEU suggest that the first sentence: "{Individual named SCH or SCH group named in Section 2.1.1} shall be safe and suitable for human consumption." should always be inserted in the standards, independently whether physical characteristic limits exist or not in Annex 1, Table 2.

**3.2.2 Odour, flavour and colour**

It should be made clear, that any individual colour characteristics should be described under this point.

**3.2.3 Classification (optional)**

It seems there is a misinterpretation in this point. If the physical/chemical characteristic tables list classes or grades, and the product is traded as classified, then the corresponding requirements for each grade shown in

those tables must be applied. If the product is traded as 'unclassified,' the chemical and physical requirements for the lowest class/grade shall apply as the minimum requirement.

It seems, there is an inconsistency in the existing spice standards: while standards (cumin, oregano, saffron, chilli pepper and paprika), where different grades/classes exist, correctly indicate "When XX is traded as unclassified/ungraded, the chemical and physical characteristics of class/grade YY apply as the minimum requirements".

There are standards (ginger, basil, garlic) where there are no classes/grades and correctly, there is no provision on classification.

However, there are standards (cardamom, turmeric, cloves, nutmeg), in which no different classes/grades exist, but contain the following provision: "If traded as classified, the provisions in Annex I shall apply as minimum requirements." This begs the question as to how these can be traded as classified, if there are no classes indicated.

#### 4. FOOD ADDITIVES

The MSEU would suggest including the option of prohibition in order to emphasise that other standard may not permit the use of food additives (e.g. draft saffron standard) and modify the provision accordingly:

"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 group name} or no food additives are permitted (as specified in other standards)".

#### 8. LABELLING

**8.1.1** The name of the product shall be ***the individual dried [SCH name] or {names of SCH within a group}*** as described in Section 2.1 if the omission of the word dried would not mislead or confuse the consumer.

The MSEU would like to note that 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. Therefore, 8.1.1 would be redundant

If 8.1.1 is kept, the MSEU suggest the following wording for 8.1.1 **"The name of the product shall be the 'common name', as described in Section 2.1."**

**8.1.3** The **trade name or the** scientific name **may (shall) be indicated** ~~of the product is optional.~~

The MSEU suggest merging 8.1.3 and 8.1.4 with the following wording 8.1.3 "The trade name or the scientific name may (shall) be indicated". And thus 8.1.4 would be redundant. However, it is acknowledged that specific standards may require the indication of the trade name to be mandatory.

**8.2.1** Country of origin shall be ~~declared~~ **indicated**

The MSEU suggest "The country of origin shall be indicated". The term "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 ~~may be declared~~ (optional)

The MSEU suggest the following wording: 8.2.2 "Country of harvest (optional)." However, in certain cases, in which further clarification might be needed in the standard, the country of harvest should be mandatory.

**8.2.3** Region of harvest and year of harvest ~~may be declared/indicated~~ (optional)

The MSEU suggest the following wording: 8.2.3 "Region of harvest and year of harvest (optional)."

#### Annex I - General comment:

##### Annex I - Table 1: Chemical characteristics

The MSEU propose to move the terms "(max)" or "(min)" always at the end of the name of the parameters. The term "(max)" should be added at the end of the "non-volatile ether extract" column.

##### Annex I - Table 2: Physical characteristics

It is not clear why the different physical characteristics listed in this table differ from other existing and draft standards.

It would be worth considering adding definitions of terms extraneous matter and foreign matter, which would be the same for all spices and herbs. A good example is the standard for oregano: "Extraneous matter - vegetative matter associated with the plant from which the product originates but not accepted as part of the final product, such as stems/sticks, etc."; "Foreign matter - any visible/detectable objectionable foreign matter

or material not usually associated with the natural components of the spice plant, such as stones, burlap bagging, metal, foreign leaves, etc.”

In the existing standards the provision “visible mould” in some instances; in others, “mould damage” is used. Consequently, the tables on “Methods of analysis” contain those different provisions and list different methods. The reason for this distinction should be clarified, as well as whether ISO 927 could be used for both provisions.

## Kenya

### General Comments

Kenya appreciates the leadership of the United States of America in coordinating the revision and update of the template for Codex standards for spices and culinary herbs (SCH). The proposed updates will help to ensure that SCH standards are consistent, technically sound, and easier to apply across both individual and group standards.

Kenya recognizes the importance of maintaining a harmonized and flexible standard layout that can accommodate the diversity of SCH commodities, including differences in physical, chemical, and organoleptic characteristics. Kenya supports the intention to make the template dynamic and adaptable, as stated in paragraph 5 of the document, to reflect the unique nature of each SCH.

Kenya further supports the proposal to make the updated template publicly available through the Codex website and to require alignment of all new and ongoing work by electronic working groups (EWGs) to this revised format. This will enhance uniformity, reduce duplication, and improve the quality and comparability of Codex SCH standards globally.

Kenya proposes that any future revisions of the template should continue to be conducted through inclusive consultations, allowing sufficient time for Member input, particularly from developing countries that are major producers and exporters of SCH.

### Specific Comments:

#### Recommendation (a) – Endorsing the revised/updated template

**Comment:** Kenya supports endorsement of the revised template and requests CCSCH to provide a short guidance note summarizing the key changes made from the previous version to facilitate its application by EWGs and Member Countries.

**Rationale:** A summarized guidance note will help members quickly understand and apply the changes, especially for ongoing work.

#### Recommendation (b) – Uploading the template on Codex website

**Comment:** Kenya strongly supports this recommendation and proposes that the Codex Secretariat upload both the editable and non-editable formats of the template for easy access and use by Members.

**Rationale:** Public accessibility will promote consistent application and encourage greater participation from developing countries and observers.

#### Recommendation (c) – Alignment of existing standards with the updated template

**Comment:** Kenya supports this proposal and recommends that CCSCH consider a phased approach to align existing standards, prioritizing those most traded or under review. Kenya also proposes that group standards be prioritized for alignment to maximize harmonization across related SCH.

**Rationale:** A phased alignment approach will allow manageable transition and efficient resource utilization, ensuring that high-impact standards are updated first.

### Additional Observations

- Kenya encourages the inclusion of examples or guidance text within the template to aid EWGs in the consistent drafting of sections such as Description, Essential Composition and Quality Factors, and Contaminants.
- Kenya further suggests that the scientific and analytical terminology used in the template be harmonized with Codex Committee on Methods of Analysis and Sampling (CCMAS) documents to avoid duplication or inconsistency.
- For developing countries, Kenya recommends that capacity-building initiatives be supported through FAO/WHO to enhance understanding and application of the SCH standard template in national standard-setting and Codex participation.

**Thailand**

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

1We would like to propose that the product name should be prefixed with “Dried or Dehydrated” for consistency throughout the draft standard."

2. We propose adding the text "(non-exhaustive list of name/s under which the product/s is traded)" alongside the trade name(s) in Table 1 of each draft standard, similar to the template, to indicate that the use of trade names is not limited to those listed in the table.