

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 2.1, 3.1, 3.2, 4.1, 5.1, 6.1

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

AGENDA 2: MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND ITS SUBSIDIARY BODIES

Matters for Action arising from Subsidiary Bodies:

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

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

India supports option *(b) change the name of the provision to make it clear that the provision is “colouring power expressed as curcuminoids”*.

Accordingly Revise the name of the provision in CXS 359-2024 i). Annex I Table A1- ‘Curcuminoids content (colouring power) and ii) Table 4.1 Method of analysis ‘Colouring power (curcuminoids content) to “colouring power expressed as curcuminoids”

Rationale: ISO 5566: Turmeric — Determination of colouring power — Spectrophotometric measures the curcumin content based on the absorption of light at 425 nm, hence, it is more directly related to the measurement of the colour of turmeric.

54th and 55th Sessions of the Codex Committee on Food Additives (CCFA54 and CCFA55)

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

India would like to highlight that, spices industry generally uses INS 220 (Sulfur dioxide) as a bleaching agent under the listed functional classes, **in the dried or dehydrated Ginger (CXS 343-2021)**.

GSFA Table 3 related questions

India proposes to retain table-3 additives for spices and culinary herbs as lot of spices and culinary herbs standards are still required to be developed by this committee and table-3 additives other than anticaking agents may be required to be used in those standards.

In addition, there are non-standardised foods in which table-3 additives are required to be used by the industries manufacturing these products.

iii) Clarification regarding non-standardized spice products

Food category 12.2.1 should not be included in Annex to table-3 of GSFA as it may contain non-standardized foods like spices pastes (Red chilli paste, ginger garlic paste etc) in which organic acids like citric acid, acetic acid, preservatives etc from table-3 of GSFA may be used in these standardized foods.

Further antioxidants from table-3 shall be required in high oil containing spices pastes.

AGENDA 2.1: Request for information on the use of “country of harvest” in the labelling of spices

India supports the mandatory declaration of the country of harvest.

Rationale: Country of Harvest & country of origin are part of ‘Format of Standard’ adopted by CCSCH since beginning and the term “Harvest” has already been defined in the glossary of terms under the CCSCH. Keeping both the labelling provisions of country of origin and country of harvest as mandatory in the standard of high value spices like saffron & vanilla is warranted, being a specific case and is also consistent with the decision taken in CCSCH5 about assessing the need for these provision based on specific needs of SCH standards.

Mandating the declaration of the “country of harvest” is expected to have a positive influence on trade. Rather than acting as a barrier, this requirement can enhance the global trade of premium and authentic spices such

as saffron and vanilla by reinforcing their provenance and quality. It would empower consumers to make informed choices and foster greater trust in the products they purchase

AGENDA 3: DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED FRUITS AND BERRIES

AGENDA 3.1: Requirements for vanilla (Step 6/7)

2.2 Styles

India supports the proposal to separate “ground” and “powdered” vanilla into distinct styles as mentioned in bullet 6 and 7, as moisture content of the both the styles as different during the grinding process and it is in alignment with existing trade practices.

3.2.3 Classification (Optional)

India Proposes to remove the section 3.2.3 Since there is no classification of grades/classes in the Annex-1 (Chemical and Physical Characteristics for Vanilla).

4. FOOD ADDITIVES

India proposes to retain “*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*”

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

India proposes to retain the word ‘may’ thereby keeping the provision optional in alignment with standard layout for spices and with existing trade practices.

8.2.2 Country of harvest (optional) [mandatory]

India proposes support the mandatory declaration of the country of harvest.

Rationale: Country of Harvest & country of origin are part of ‘Format of Standard’ adopted by CCSCH since beginning and the term “Harvest” has already been defined in the glossary of terms under the CCSCH. Keeping both the labelling provisions of country of origin and country of harvest as mandatory in the standard of high value spices like saffron & vanilla is warranted, being a specific case and is also consistent with the decision taken in CCSCH5 about assessing the need for these provision based on specific needs of SCH standards.

Mandating the declaration of the “country of harvest” is expected to have a positive influence on trade. Rather than acting as a barrier, this requirement can enhance the global trade of premium and authentic spices such as saffron and vanilla by reinforcing their provenance and quality. It would empower consumers to make informed choices and foster greater trust in the products they purchase.

Annex-1 Chemical and physical characteristics for vanilla

India proposed to support proposed, **Option 3 Table A1. A new proposal for the Committee’s consideration from the EWG.**

India proposes to revise the moisture content to (30% max.) for Whole, (20% max.) for powder and vanillin content on wet basis (2% min.) for all styles.

Further India proposes to include total ash (5% max.) and acid insoluble ash (1% max.) in the chemical characteristics of Vanilla.

Table A2. Physical characteristics of vanilla

India proposes **[NA]** for Extraneous matter in ground /powdered* products.

Rationale: Extraneous matter in Ground/powdered vanilla cannot be detected as it will be in ground form.

Table A3. Methods of analysis for vanilla

India proposes to include test method for total ash (ISO 939 and ISO 928) and acid insoluble ash (ISO 939 and ISO 930).

AGENDA 3.2: Requirements for large cardamom (Step 3/4)

2.2 Styles

India suggest to remove the term **1/4th opened capsules** in the style whole as this is a defect which may be included as a parameter in the physical characteristics.

Further, India suggest to remove the sentence “*Other styles distinctly different from those four listed above are allowed, provided they are labelled accordingly*” Since all the styles are covered in the draft standard.

Table A1: Chemical characteristics for dried or dehydrated large cardamom

India suggests moisture content of 11% in ground/powdered form of large cardamom

Table [A2]: Physical characteristics for dried or dehydrated large cardamom

Whole

India suggest to revise the extraneous matter (1% Max), Empty and malformed capsules by count (2% Max), Immature and shrivelled capsules (2% Max).

Further India suggest to include the parameter **1/4th opened capsules (5%)**

AGENDA 4: DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED BARKS

AGENDA 4.1: Requirements for cinnamon

1. SCOPE

India reiterates that, separate standards to be specified for Cinnamon (Part-A) and Cassia (Part-B) under group “Standard for Spices Derived from Dried or Dehydrated Bark”

Rationale: The proposed standard is for cinnamon. Species such as *Cinnamomum cassia*, *Cinnamomum burmannii*, and *Cinnamomum loureirii* are considered as Cassia. It is to note that coumarin content in Cassia is more compared to true Cinnamon and it has health defects linked to liver damage. Further Cassia is used as a common adulterant for true Cinnamon. (i.e., *Cinnamomum zeylanicum*/*Cinnamomum verum*).

In addition, there are separate ISO standards for Cassia (ISO6538:1997) and Cinnamon (ISO6539:1997) as mentioned in the agenda item 2.2 (page number-07 &08) of CCSC8 and both the spices have separate HSN Code and traded separately.

2.1. Product definition

India proposes to change “[peeled or unpeeled]” to “peeled” for cinnamon and “peeled or unpeeled” for cassia in the product definition.

India again reiterates that separate standards to be specified for Cinnamon (Part-A) and Cassia (Part-B) with species as suggested below;

Part-A: Cinnamon

Common name	Trade name/type	Scientific name
Ceylon Cinnamon	Sri Lanka type Indian type Madagascar type Seychelles type	<i>Cinnamomum zeylanicum</i> Syn.; <i>Cinnamomum verum</i>

Part-B: Cassia

Common name	Trade name/type	Scientific name
Cassia	Chinese type Indonesia type Burmanii type Korintje type Padang Cassia type Saigon or Vietnamese type	<i>Cinnamomum cassia</i> <i>Cinnamomum burmannii</i> <i>Cinnamomum loureirii</i>

2.2 Styles

ground/powdered

India suggest to remove “particle size to be determined by contractual agreement between buyer and seller”

Further, India suggest to remove the sentence “Other styles distinctly different from those four listed above are allowed, provided they are labelled accordingly” Since all the styles of the cinnamon are covered in the draft standard as per existing trade practices.

3.2.3 Classification (Optional)

India Proposes to remove the section 3.2.3 Since there is no classification of grades/classes in the Annex-1 (Chemical and Physical Characteristics for Cinnamon).

Chemical characteristics of Cinnamon

India again reiterates that, separate chemical characteristics should be specified for Cinnamon and Cassia

Rationale: The proposed standard is for cinnamon. Species such as *Cinnamomum cassia*, *Cinnamomum burmannii*, and *Cinnamomum loureirii* are considered as Cassia. It is to note that coumarin content in Cassia is more compared to true Cinnamon and it has health defects linked to liver damage. Further Cassia is used as a common adulterant for true Cinnamon. (i.e., *Cinnamomum zeylanicum*/*Cinnamomum verum*).

In addition, there are separate ISO standards for Cassia (ISO6538:1997) and Cinnamon (ISO6539:1997) as mentioned in the agenda item 2.2 (page number-07 &08) of CCSC8 and both the spices have separate HSN Code and traded separately.

Further India suggest following chemical and physical characteristics for cinnamon and Cassia

Part-A: Cinnamon

(I) Chemical characteristics of Cinnamon

1. Whole/Sticks/Quills and Pieces/Cut/Cracked/Broken

India suggests the following values for style whole/quills: The moisture content (% w/w, max) 12; total ash (% w/w, max) on dry basis 7; acid insoluble ash (% w/w, max) on dry basis 2; volatile oils (ml/100 g, min) on dry basis 0.7; and coumarin content (% max) on dry basis 0.3.

2. Ground/Powdered

India suggests the following values for ground/powdered form: Moisture content (% w/w, max) 12; total ash (% w/w, max) on dry basis 7; acid insoluble ash (% w/w, max) on dry basis 2; and volatile oils (ml/100 g, min) on dry basis 0.5 and coumarin content (% max) on dry basis 0.3.

(II) Physical characteristics of Cinnamon

1. Whole/Sticks/Quills and Pieces/Cut/Cracked/Broken

India suggests the following values for style whole/quills: Extraneous matter (% w/w, max) 1; foreign matter (% w/w, max) 0; mould damage or mould visible (% w/w, max) 0; dead whole insects (count/100 g, max) 0; insect damage (% w/w, max) 1; excreta, mammalian and/or other (mg/kg, max) 0; and excreta, other (mg/kg, max) 0.

2. Ground/Powdered

India suggest Ground/powdered form of cinnamon shall be free from all the extraneous matter, foreign matter, mould/insect damage and mammalian excreta.

Part-B: Cassia

(I) Chemical characteristics of Cassia

1. Whole/Sticks/Quills and Pieces/Cut/Cracked/Broken

India suggests the following values for style whole/quills: The moisture content (% w/w, max) 12; total ash (% w/w, max) on dry basis 5; acid insoluble ash (% w/w, max) on dry basis 1; volatile oils (ml/100 g, min) on dry basis 2%.

2. Ground/Powdered

India suggests the following values for styles ground/powdered: Moisture content (% w/w, max) 12; total ash (% w/w, max) on dry basis 5; acid insoluble ash (% w/w, max) on dry basis 1; and volatile oils (ml/100 g, min) on dry basis 1.5.

(II) Physical characteristics of Cassia

1. Whole/Sticks/Quills and Pieces/Cut/Cracked/Broken

India suggests the following values for style whole/quills: Extraneous matter (% w/w, max) 1; foreign matter (% w/w, max) 0; mould damage or mould visible (% w/w, max) 0; dead whole insects (count/100 g, max) 0; excreta, mammalian and/or other (mg/kg, max) 0; and excreta, other (mg/kg, max) 0.

2. Ground/Powdered

India suggest Ground/powdered form of Cassia shall be free from all the extraneous matter, foreign matter, mould/insect damage and mammalian excreta.

TableA3: Method of Analysis for Cinnamon

India proposes to include the parameter “Cinnamaldehyde”

Rationale: Cinnamaldehyde is mentioned in the Table A1: Chemical characteristics of cinnamon, further Cinnamaldehyde is major essential quality parameter in the Cinnamon. Therefore, India proposes to include Cinnamaldehyde in the Methods of Analysis for Cinnamon

[Cinnamaldehyde Content]	[Methanol extracts]	[Chromatography] [HPLC] [GC-MS]
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AGENDA 5: DRAFT STANDARD FOR SPICES IN THE FORM OF DRIED SEEDS

Agenda 5.1: Requirements for coriander

2.1 Product definition

India supports to retain the term **seeds** in the product definition, since dried/dehydrated coriander is generally traded as seed spice.

2.2 Styles

India suggests to remove the style **cracked or broken**, since these styles are not traded as such but usually processed into powdered form.

Further, India suggest to remove the sentence “*Other styles distinctly different from those mentioned above are allowed, provided they are labelled accordingly*” Since all the styles of the coriander are covered in the draft standard as per existing trade practices.

3.2.4. Classification

India proposes to remove Group/Grade in the in Table-2, Table-3 of Annex-1 and Annex-2 respectively.

Rationale: Group/Grade referred in the chemical and physical characteristics are not mentioned in the proposed standard

Table A1: Chemical characteristics of dried or dehydrated coriander

India supports a maximum moisture content of 9% (w/w) for both whole and powdered coriander, and proposes volatile oil limits of 0.1% in whole coriander and 0.09% in coriander powder, considering that loss of volatile oil occurs during the grinding process.

Table A2: Physical characteristics of dried or dehydrated coriander

Whole

India suggest to revise the extraneous matter (1% Max), splits fruits (10%), Damaged or discoloured fruits (2%), Insect damaged matter (1%).

AGENDA 6: DRAFT STANDARD FOR HERBS

AGENDA 6.1: Requirements for sweet marjoram

2.2 Styles

India suggest to remove “*The particle size of ground/powdered styles is determined by contractual agreement between buyer and seller*”

Further, India suggest to remove the sentence “*Other styles distinctly different from those mentioned above are allowed, provided they are labelled accordingly*” Since all the styles of the coriander are covered in the draft standard as per existing trade practices.

3.2.4 Classification (optional)

India Proposes to remove the section 3.2.4

Rationale: Since there is no classification of Grades/class in the Annex-1 (Table-A1: Chemical characteristics for dried sweet marjoram and Table-A2: Physical characteristics for dried sweet marjoram), section 3.2.4 may be removed.