

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 3.1, 4.1, 5.1, 5.2, 6.1, 7.1 and 8.1

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS
Fifth Session
Virtual, 20 - 29 April 2021**

Comments from India

I. Agenda item 2: Matters referred by the Codex Alimentarius Commission and Its subsidiary bodies

B: Matters for action

i) 51st session of the Codex Committee on Food Additives¹¹ (CCFA51)

Comment: Calcium oxide is used for liming in ginger, as a processing aid. Liming make ginger less susceptible to the attack of insect pests during storage and shipping and gives it a better appearance. Therefore, usage of CaO should be covered as 'processing aid' and not food additive.

SO₂ is also used as a colour retention agent in processing of ginger, hence its use should also be covered as a 'processing aid' and not a food additive.

ii) 45th Session of the Codex Committee on Food Labelling (CCFL45),

- Paragraph 18 pertaining to Section 8.3 and 8.3.1 "Country of Origin/Country of Harvest"

We support mandatory declaration of only country of origin on the label, in line with the provisions of General Standard for Labelling of Prepackaged foods, wherein the country of origin of the food shall be declared if its omission would mislead or deceive the consumer. We also suggest that the provisions related to country of origin should be consistently used in all standards being developed by CCSCH.

- Inspection mark (optional)- We suggest deleting this sub-section, as it is neither defined in any Codex text, nor required in the CCSCH standards. This is a matter of agreement between the buyer and seller and need not be specified in a Codex standard.

II. Agenda item 3.1: Draft Standard for Dried Oregano

Section 3.2 Quality factors

- i) The parameter 'Moisture' should be mentioned under the Table 3: Chemical requirements, as per the format of other draft standards.

Table 2. Physical requirements for whole/crushed/rubbed and ground/powdered oregano

- i) Parameter "Insect fragments" may be deleted, as these are not applicable in this standard

Table 3. Chemical requirements

- i) Acid-insoluble ash, % mass fraction (dry basis), maximum- In case of ground/powdered oregano should be '2' in place of '2.5'.

- ii) Volatile oils, ml/100 g (dry basis), minimum- In Whole/crushed/Rubbed Oregano should be 1.8 in place of 1.5.

Sub-section 8.3: Country of origin

Comment: The title of the section is 'Country of origin', while the content specifies provision for 'country of harvest'. This needs to be aligned with other draft and proposed draft standards, and only 'country of origin' should be made mandatory, in line with the provisions of General Standard for Labelling of Prepackaged foods, wherein the country of origin of the food shall be declared if its omission would mislead or deceive the consumer.

III. Agenda item 4.1: Draft Standard for Dried or Dehydrated Ginger

Table 1. Common and scientific names of plants used as dried or dehydrated ginger

Editorial correction: comma to be removed from the scientific name, as follows:

Zingiber officinale Roscoe

Annex I, Table 2- Chemical characteristics

- i) Total Ash on dry basis %w/w (max) in case of Ground/powdered- value for bleached ginger as '12' should be added;
- ii) Acid insoluble ash value should be NMT 1 % in case of whole and ground ginger.
- iii) Calcium (as oxide) on dry basis – should be specified as not more than 2% by weight for both Bleached and unbleached dried Ginger whole and ground/powdered;
- iv) We propose to remove 'optional for bleaching', parameters for bleached ginger should be retained in the table as such, without referring to the process as optional. We believe there is no requirement for it to be mentioned explicitly in the standard. Moreover, CaO is used as a processing aid, and the usage of food additives and processing aids is always optional, not mandatory. Therefore, the mention of 'bleaching as optional' does not add any value to the standard and should be removed.
- v) SO₂ is used as a colour retention agent in processing of ginger, hence its use should be covered as a 'processing aid' and not a food additive.

We also propose that in Table 2 in draft standard of dried and dehydrated ginger, under 'Notes', the phrase "SO₂ shall not be detected" may be removed, and a limit of 150 mg/kg for SO₂ may be included.

Table 2. Chemical requirements for dried or dehydrated ginger

Product	Style	Chemical properties			
		Ash on dry basis %w/w (max)	Acid Insoluble Ash on dry basis %w/w (max)	Calcium (asoxide) on dry basis bymass, % (max)	Notes
Dried or	Whole	8.0 (unbleached)	2.0 1.0	1.1(unbleached)–	Sulphur-dioxide shall

dehydrated Ginger	/pieces	12.0 (bleached)		2.5 (bleached)	not be
	Ground /powdered	8.0 (unbleached) <u>12.0 (bleached)</u>	1.0 1.0	2	detected 150

*Bleaching is optional

Annex I, Table 3. Physical requirements

- i) Mould visible for ground/powdered should be '0'
- ii) Extraneous matter %w/w (max)- should be '1' for Whole style and 'N/A' for ground/powdered style;
- iii) Foreign matter %w/w (max)- should be 'N/A' for ground/powdered style;

Table 3. Physical requirements for dried or dehydrated ginger

Product	Style	Physical properties		
		Mould visible/Insect defiled/infested %w/w (max)	Extraneous matter ¹ %w/w (max)	Foreign matter ² %w/w (max)
Dried or dehydrated Ginger	Whole	3.0	2.0 1.0	0.5
	pieces	3.0	2.0 1.0	0.5
	Ground/powdered	{1} NA	1.0 NA	0.5 NA

IV. Agenda item 5.1: Draft Standard for Dried Cloves

Table 1 of Product definition

- i) Editorial correction to replace comma with a dot, should be made in the scientific name and it should read as follows:

Syzygium aromaticum (L). Merrill & Perry

Annex I, Table 2- Chemical characteristics

- i) Annex 1 Table 2 and Table 3, headings to be amended as follows:
Table 2: Chemical requirements **for Dried cloves**
Table 3: Physical requirements **for Dried cloves**
- ii) Add 'dry basis' with the parameter 'Total Ash' %w/w (max) for consistency with the method of analysis;
- iii) Volatile Oilsml/100g (min)- should be '16' in case of ground style;
- iv) Column on "Notes" to be removed, as it does not add any value to the standard

v) Changes in the table are as shown below:

Product	Style	Total Ash %w/w dry basis (max)	Volatile Oils ml/100g (min)	Notes
Dried Clove	Whole	7	17	
	Ground	7	14 16	

Annex I, Table 3. Physical requirements

- i) Mold visible and insect defiled/infested should be 'NA' in both styles;
- ii) Extraneous matter should be '0' in case of ground/powdered style;
- iii) Defects (Headless/ Mother/ Khoker) % (max) should be 2/2/2
- iv) Footnotes 1 and 2 correspond to Defects (Headless/ Mother/), however these are also mistakenly superscripted on extraneous matter and foreign matter. Separate footnotes corresponding to extraneous matter and foreign matter shall be given, as is done in other draft and proposed draft standards.
- v) Changes in the table are as shown below:

Product	Style	Mold visible and %w/w (max)	Insect defiled/infested %w/w (max)	Extraneous matter ¹	Defects (Headless ¹³ / Mother ²⁴ /Khoker ³⁵) % (max)
Dried Clove	Whole	1 NA	17	1	5/6/5 2/2/2
	Ground	1 NA	14 16	1 0	NA

Footnotes:

1Vegetative matter associated with the plant from which the product originates but not accepted as part of the final product.

2Any visible/detectable objectionable foreign matter or material not usually associated with the natural components of the spice plant, such as sticks, stones, burlapbagging, metal, etc.

13Headless Clove: Clove consisting of only the receptacle and sepals and which has lost the dome-shaped head.

24 Mother Clove: Fruit of the clove tree (*Syzygium aromaticum*) in the form of an ovoid brown berry surmounted by four incurved sepals.

35Khoker Clove: Clove having undergone fermentation as a result of incomplete drying, as evidenced by its pale

brown colour, whitish mealy appearance and often wrinkled surface.

V. Agenda item 5.2: Draft Standard for Saffron – (Updated)

Annex I, Table 1: Chemical characteristics of Dried Floral Parts- Saffron

- i) Minimum values given for Taste strength and Colouring strength are too high and will be trade restrictive. Therefore, we propose to keep values of '30' and '80' respectively;
- ii) 'ND' as provided for various parameters under Tables 1 and 2, should not be part of the standard, there should be a value (0) in place of 'ND'

VI. Agenda item 6.1: Draft Standard for Dried Basil

Section 5: Contaminants

Comment: Delete reference to the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014), as it is not required in this standard, and is also not mentioned in other draft standards under consideration of the committee.

Annex II, Chemical characteristics

- i) Values for 'Acid-insoluble ash' should be '2' in case of crushed and ground styles as well.

A. Chemical Characteristics of Dried Basil

General Name	Style	Acid-insoluble ash'
Basil	Whole/intact	2
	Crushed/rubbed/flaked	2-5 <u>2</u>
	Ground/powdered	2-5 <u>2</u>

Annex II, Physical Characteristics

- i) Delete the parameter 'colour defects', as these are too subjective and also these are not mentioned in other standards as well as the template for group standard, as follows:

General Name	Style	Other defects	
		Name	Limit
Basil	Whole/intact	Color defects ¹⁺	5
	Crushed/rubbed/flaked	% w/w	5
	Ground/powdered		-

VII. Agenda item 7.1: Proposed Draft Standard for Dried or Dehydrated Chilli Pepper and Paprika

1. Scope

Comment: This Standard applies to chilli pepper and paprika in their dried or dehydrated form, defined in section 2.1, to be offered as such for the consumer **offered for direct consumption**, as an ingredient in food processing or for repackaging **repackaging** if required. It excludes products for industrial processing

Rationale: To align with the format of other CCSCH standards and group standard template.

2. Product definition

Comment: Delete 'without' within square bracket, so the sentence reads as follows:

Dried or dehydrated chilli pepper or/and paprika is the product obtained from drying the fruits/pods of plants mentioned in table 1, with or without seeds, stems/stalks and processed in an appropriate manner.

Rationale: We propose this since; chilli pepper or/and paprika can also be traded with stems/stalks.

3. Styles/forms

1. **Comment:** We propose deletion of the following:

~~Ground chilli pepper or/and ground paprika is the product obtained by grinding whole dried chilli pepper or paprika with or without the placenta, seeds, calyx and stalk without any other added matter~~

~~Ground chilli pepper may vary in colour from pale white to deep red according to the species/varieties. Ground paprika may vary in colour from orange to red according to the species/varieties~~

~~The ground product may be of any particle size, according to agreement between the trading parties concerned~~

Rationale: The text above is not required in the standard, the physical characteristics are already given in Annexes.

4. Section 3.2.3: Classification

Comment: We propose the following amendment:

When dried or dehydrated ~~chilli peppers and~~ paprika is unclassified, the provisions for physical and chemical characteristics applicable to class III apply as minimum requirements

Rationale: No classification is given for chilli peppers in the Chemical and Physical characteristics tables. Classes given in the tables apply to Paprika only and therefore deletion of chilli peppers is proposed from this sentence.

5. Section 3.2.4: Sizing

Comment: We propose to delete the section on Sizing, since it need not be mentioned specifically in the standard, as it may be agreed upon as per contractual agreement between trading partners. Moreover, it is also not a part of the template for group standards.

6. Section 3.3 and 3.4

Comment: Delete sections 3.3 and 3.4 to align with other standards and template for group standard.

7. Section 8.3: Country of origin/country of harvest

Comment: We propose the following revision:

Country of origin/country of harvest

~~Country of origin shall be indicated and the country of harvest, region of production may be indicated.~~

~~[8.3.1.1 If there is more than one country of harvest may be indicated using the legend and /or.]~~

~~8.3.2 Year of harvest (optional)~~

Country of origin shall be declared, as per the provisions given under section 4.5 of the General Standard for Labelling of Prepackaged foods (CXS 1-1985).

8. Section 8.4: Commercial Identification

Comment: We propose to delete "size", as follows:

- - **Class/Grade, if applicable**
- - **Size (optional)**

9. Annex I: Table 2. Chemical Properties for Dried or Dehydrated Chilli Pepper and Paprika

- i) We support Moisture % w/w- 11% for all styles of Chilli pepper and Paprika;
- ii) Total ash (dry basis) %w/w (max)- should be '8' for all styles of Chilli pepper;
- iii) Acid insoluble ash (dry basis) %w/w (max)- should be '1.3' for all styles of Chilli pepper;
- iv) We support Pungency scoville units more than 900 for chilli pepper and Less than 900 for Paprika;
- v) We propose to delete the parameter for 'Capsaicin content', since 'Pungency scoville units' is already specified which is a sufficient measure of pungency, thus capsaicin content is not required.
- vi) We support 'NA' for colour value in case of Chilli pepper, as these do not apply to Chilli pepper. These are only applicable to Paprika.
- vii) We support colour value of '80' and '120' respectively for Crushed and ground (Class I) Paprika.

Proposed values are as show in table below:

Product	Styles/ Form	Classes	Chemical Properties				
			Moisture % w/w (max)	Total ash (dry basis) %w/w (max)	Acid insoluble ash (dry basis) % w/w (max)	[Pungency Scoville units	Colour Value ASTA Colour Units (min)
Chilli pepper	Whole	NA	11 [12]	10 <u>8</u>	4.6 <u>1.3</u>	≥900 [≥ 450]	NA
	Crushed/ Cracked/ Broken	NA	11 [12]	10 <u>8</u>	4.6 <u>1.3</u>	≥900 [≥ 450]	NA <u>60</u>
	Ground	NA	11 [12]	10 <u>8</u>	4.6 <u>1.3</u>	≥900 [≥ 450]	NA <u>60</u>
Paprika	Whole	Class I	11	8	1.3	<900 [< 450]	120
		Class II	11	8	1.6	<900 [< 450]	100
		Class III	11 [12]	8.5 [10]	1.6	<900 [< 450]	80
	Crushed/Cracked/broken	NA	11	8 [10]	1.6 [3]	<900 [< 450]	80 [60] [70]
	Ground	Class I	11 [12]	8 [10]	1.6 [1.3] [3]	<900 [< 450]	[80] [60] 120
		Class II	11 12	8	1.6	<900 [< 450]	100
Class III		11 12	8 <u>8</u>	1.6	<900 [< 450]	80	

10. Table 3. Physical Properties for Dried or Dehydrated Chilli Pepper and Paprika

Comment:

- i. We propose to delete the parameters “Insect filth” and “Rodent filth hairs”, as these are not applicable in Chilli pepper and Paprika;
- ii. Extraneous Matter should not be more than 1% in case of whole style of both Chilli pepper and Paprika;

VIII. Agenda item 8.1: Proposed Draft Standard for Dried Seeds – Nutmeg

1. Scope

Comment: This standard applies to dried seeds, in their dried or dehydrated form as spices ~~or culinary herbs~~ as defined in Section 2.1 below, offered for direct consumption, as an ingredient in food processing, or for repackaging if required. It excludes dried seed for industrial processing.

Rationale: Term ‘Culinary herbs’ is not applicable.

2. Product definition

Sub-section 2.1.1 and 2.1.2

Comment: Text from sub-section 2.1.2 to be shifted to sub-section 2.1.1, as follows:

~~Dried seeds covered by this Standard (Table 1)~~ **Dried nutmeg is the product prepared from “Seeds” which are separated from fruits of *Myristica fragrans* of the *Myristicaceae* family having reached appropriate degree of development, harvested and post-harvest treated properly, by undergoing operations such as stripping, drying, sorting, cracking, grading, and/or grinding before the final packaging and storage, as mentioned in Table 1 and** are sold in styles as indicated in 2.2 (included)

Sub-section 2.1.3

Comment: Delete sub-section 2.1.3, as it is not required under the product definition as such. Physical requirements are separately given in Annex to the standard.

3. Styles

Comment: We propose to delete “seeds” and remove the square bracket to retain “nutmeg”, and also rename the styles as follows:

Dried seeds **Nutmeg** may be offered in one of the following styles:

- ~~Whole Inshell Seed with shell~~
- ~~Whole shelled seed—seed without shell~~
- Broken **Cut** seeds and
- Ground/Powdered

4. Section 2.3 and 2.4: Varietal types and sizing

Comment: We propose to delete these sections, as follows:

~~2.3. Varietal Types~~

~~Varietal type is *Myristica fragrans* Houtt., and not applicable to other species of nutmeg.~~

~~2.4 Sizing (Optional)~~

~~Whole nutmegs (inshell and shelled) may be sized by count per weight, weight, diameter, or in accordance with pre-existing trade practice. When sized, the methods used should be labeled on the package.~~

Rationale: Varietal type mentioned here is already covered under section 2.1-Product definition. Sizing need not be mentioned specifically in the standard, as it may be agreed upon as per contractual agreement between trading partners. Moreover, it is also not a part of the template for group standards.

5. Section 3.2.2: Physical and Chemical Requirements

Comment: Change the title and the subsequent text as follows to align with other standards and template for group standard, as follows:

Physical and Chemical Requirements Chemical and Physical characteristics

Dried seeds nutmeg shall comply with the requirements specified in Annex I (~~physical requirements~~ Chemical Characteristics) and Annex II (~~chemical requirements~~ Physical Characteristics). The defects allowed must not affect the general requirements of the product as regards to its quality, keeping quality and presentation in the package

6. Section 3.3 and 3.4

Comment: Delete sections 3.3 and 3.4 to align with other standards and template for group standard.

7. Section 4: Food Additives

Comment: We suggest amending the statement as per format of commodity standards as given in Codex Procedural Manual, and in alignment with other standards as follows:

Anticaking agents listed in Table 3 of the General Standard for Food Additives (CXS 192- 1995) are acceptable for use in the powdered form of the foods conforming to this standard.

8. Section 8.3: Country of origin/country of harvest

Comment: We propose the following revision:

Country of origin/country of harvest

~~Country of origin/country of harvest shall be indicated, and optionally region of production—~~

~~Year of harvest (optional) _____~~

Country of origin shall be declared, as per the provisions given under section 4.5 of the General Standard for Labelling of Prepackaged foods (CXS 1-1985).

8. Section 9: Methods of Analysis

Comment: To align with other standards and template for group standard, add reference to Annex III, as follows:

As described in Annex III

9. Tables for Chemical and Physical characteristics: Annex I and II

Annex I should be Table for chemical characteristics for alignment purpose. Under Table for chemical characteristics, unit of measurement for Volatile Oils content should be **mL/ 100g (min)**, in place of % mass fraction, as follows:

Volatile Oils content ~~% mass fraction~~ mL/ 100g (min)

Annex II should be Table for Physical characteristics for alignment purpose, with following changes in the parameters given in the table:

- i. ~~Extraneous vegetable matter~~ Extraneous vegetable matter;
- ii. We propose to delete the parameters “Dead whole insects”, “Insect fragments” and “Rodent contamination”, as these are not applicable in Nutmeg;
- iii. We propose deletion of Quality criteria: Qualitative as well as Quantitative and related parameters, as these are not required in the Codex standard and may be as decided between the trading partners. This standard should contain minimum essential physical requirements, as are given in other standards also.
- iv. We propose values for foreign matter, mould visible and piece of mace as below:

Product	Style	Extraneous vegetables	Foreign matter ² ,	Mould visible ³	Piece of mace,
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		matter ¹ , %w/w (max)	%w/w (max)	-% w/w (max)	% w/w (max)
Nutmeg With Shell	Whole	0.5	0.5	0.5	3
Nutmeg Without shell	Whole	0.5	0.5	4 <u>5</u>	NA
	Broken/Cut	0.5	0.5	5 <u>10</u>	0.5
	Ground/ Powdered	NA	0.4 <u>NA</u>	NA	NA

10. **Methods of Analysis Table**

- i. Add method of analysis for "Piece of Mace" through visual examination;
- ii. Remove method for "Non-volatile ether extract", as this parameter is not specified in the Chemical characteristics table.