



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

3rd Session

Chennai, India, 6 -10 February 2017

Discussion Paper on “Further Processing” within the Scope of in CCSCCH standards¹

(Prepared by the United States of America)

1. Introduction and Background

1.1 During plenary discussions at the second session of the Codex Committee on Spices and Culinary Herbs (CCSCH), there was no consensus on what is meant by “further processing” within the Scope section of its first four draft standards (Proposed Draft Standard on Dried Oregano, Proposed Draft Standard for Black, White and Green Pepper, Proposed Draft Standard on Dried Thyme and Proposed Draft Standard on Cumin). Within the CCSCCH 2 different views existed on the application of this phrase as it applies to Spices and Culinary Herbs (SCH). The CCSCCH accepted the offer by the United States to prepare a discussion paper on the “Further Processing” as it relates to SCH for discussion at the third CCSCCH Session.

1.2 At its first Session, “The Committee further agreed to use the “*Format of Commodity Standards*” (see Agenda Item 6) and to consider at its next session the need to develop specific standard layout for its work,” (REP14/SCH pg. 5. Para 40). This discussion did not occur at the second CCSCCH session prior to the plenary session elaboration of CCSCCH standards. In retrospect, a discussion of the Codex Format for Commodity Standards could have enabled the CCSCCH to make necessary standard wording adjustments that would have enabled the draft standards to reflect SCH trade practices.

1.3 During the plenary discussions at the 2nd CCSCCH, the Scope of two Codex Committees on agricultural commodities – the Codex Committee on Fresh Fruits and Vegetables (CCFFV) and the Codex Committee on Processed Fruits and Vegetables (CCPFV) were indicated as the precedent for excluding product for “further processing”. There were differing views within the CCSCCH on the interpretation of “Further Processing”; some delegations implied it meant the functions that prepare the product for sale to the consumer including cleaning, sorting, grinding and microbial reduction treatments; while others viewed it as the physical transformation of the product into a different form.

1.4 A main background for this document is the understanding that Codex standards are elaborated for application at shipping/export control point. As such the said commodity must undergo all the necessary preparatory functions in preparation for export. Therefore, this discussion paper seeks to address “further processing” by drawing on the nature and consumption method of spices and culinary herbs, scopes within existing Codex standards, trade practices, industry terminology and from the data used in the project documents submitted to develop CCSCCH standards.

2 Discussion

2.1 Nature and Consumption/ Use of Dried SCH: Dried spices and culinary herbs are not consumed singly or collectively in volumes that can be considered a meal for they have negligible caloric content. They are mainly used/consumed as ingredients/condiments in other foods for their aroma and flavoring (food enhancing) characteristics, i.e. dried thyme and parsley flakes in salads or on pasta. Individual consumers and the food processing industry use dried spices and culinary herbs for the same purposes (aroma and flavour). Hence, “Further Processing” should not apply to dried spices and culinary herbs traded for ingredients/condiments in their dried vegetative form.

¹ Please take note that this item 10(b) in the Agenda is titled: *Discussion paper on further processing (in the context of spices and culinary herbs)*.

In trade, dried spices and culinary herbs are sold at retail (direct to consumer), for food service use, as ingredients in commercial food production, or as industrial raw materials for essential oils and oleoresins. The definition of “further processing” applies to the first three user groups and does not apply to those materials intended to be made into essential oils or oleoresins. In many cases different spices or culinary herbs are imported and then mixed in their current state forming new products intended for direct consumption. Though such mixing of different dried culinary herbs or spices is not considered as processing, the standard only applies to an individual product prior to mixing and not to the mixture.

2.2 Scope of the Standard: The Scope of two existing Codex standards for dried produce- the Codex Standard for Dried Apricots (CODEX STAN 130-1981) and the Codex Standard for Raisins (CODEX STAN 67-1981) - indicate that the standards apply to products offered for “direct consumption” and “products which are packed in bulk containers and which are intended for repacking into consumer size containers or for direct sale to consumers”. Therefore, the CCSCH may consider using these relevant parts of the established Scopes as a precedent and apply them in its standards.

2.3 Actual Trade Practices: The majority of SCH are traded in bulk form due to economies of scale, physical nature of the product, food safety concerns and their end use. Intermediary functions which may include cleaning, sorting/grading, grinding and microbial reduction treatments are done prior to export and in many instances they are repeated at destination prior to packaging or re-packaging in consumer units, distribution or offering the product for sale. Therefore, the Scope of SCH standards should also include product traded in bulk intended for repacking into consumer size containers. And so, any exclusion of bulk packages from CCSCH standards excludes the majority of the dried spices and culinary herbs traded internationally.

2.4 Data within CCSCH project Proposals: Due to the absence of specifying trade data, the CCSCH project documents submitted to the CCSCH and the Codex Commission to justify elaboration of the standards did not differentiate between SCH traded for direct consumption, those traded in bulk for repacking into consumer size containers for direct sale to consumers and those for commercial food production or for industrial processing.

It is very important that the CCSCH discuss Codex Format for Commodity Standards to evaluate some of the appropriateness of pre-existing Codex standard texts/language for its.

3 Way Forward/ Recommendations

To address this issue the following solution is recommended:

- 3.1 The CCSCH’s third session should discuss the Codex “*Format of Commodity Standards*” along with a glossary of terms prior to further elaboration of the existing draft standards.
- 3.2 The CCSCH should clarify the functions/activities that are considered further processing and those that constitute industrial processing.
- 3.3 The Discussion Paper on the Glossary of Terms include the following definition of “further processing” and of “industrial processing”. The CCSCH may want to include from these definitions or other similar appropriate ones in its discussion; and also in its plenary discussion on the Glossary of Terms.
 - a. **Further Processing:** Activities necessary to transform spices and herbs from raw agricultural commodities into finished, ready-to-eat product for direct consumption by individuals or use by commercial enterprises including catering purposes or in formulated food products. These steps may include: cleaning, sorting, sifting, grinding, grading, packaging into consumer ready packaging and/or, bulk containers which are intended for repacking into consumer size containers.
 - b. **Industrial Processing:** The application of physical or chemical processes that substantially modifies or transforms a product from its original state into other products such as the extraction of essential oils or other usable component from the spice. It excludes the blending of spices.