



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5.2

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

Seventh Session

Kochi, Kerala, India

29 January – 2 February 2024

**UPDATE TO THE TEMPLATE FOR SCH STANDARDS
Comments in reply to CL 2023/81/OCS-SCH**

Comments of Brazil, Chile, Egypt, European Union, Guatemala, Iran, Iraq, Mexico, Venezuela (Bolivarian Republic of) and ICUMSA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/81/OCS-SCH issued in October 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX I**General comments**

COMMENT	MEMBER/OBSERVER
Guatemala approves updating of the template.	Guatemala
Agree with no comments	Iraq
Font and alignment seems correct only in the French version. The English version needs to be reviewed and re-formatted accordingly. There appears to only be one error in alignment in the Spanish version.	ICUMSA

Specific comments

1. SCOPE	
<p>This standard is applicable to all <u>all dried and dehydrated spices and culinary herbs</u> and plant products that are regularly sold in trade, as defined in Section 2.1 below and are offered for direct human consumption, for commercial food processing and for repackaging if required. The exact species that are bought or sold can be defined in contractual specifications. This standard is not applicable to the said products when they are meant for industrial processing.</p> <p>SCOPE OF APPLICATION: We are of the opinion that, although the specific names of products are not mentioned, the category that is being standardized must be stated explicitly, like it is clearly stated in the title of the template. The following underlined change is proposed in the text below.</p>	Venezuela (Bolivarian Republic of)
2. DESCRIPTION	
<p>PRODUCT DEFINITION</p> <p>In accordance with the structure of Table 1. Name of the SCH group regulated by this standard. To expand understanding and knowledge of spices, we could submit the inclusion of a last column indicating the part of the plant that is being traded (Part of the plant used) for consideration.</p>	Venezuela (Bolivarian Republic of)
Table 1: {SCH group name} covered by this standard	

				Mexico
	Common name]name by which the product is popularly known	Trade name/s (Non-exhaustive list of name/s under which the product/s as traded)	Scientific name	
1	- <u>Vanilla</u>	<u>Tahitian Vanilla/</u>	<u>Vanilla xtahitensis J.W. Moore (Orchidaceae)</u>	
2		<u>Maya vanilla</u>	<u>Vanilla cribbiana Soto Arenas (Orchidaceae)</u>	
				Venezuela (Bolivarian Republic of)
	Common name]name by which the product is popularly known	Trade name/s (Non-exhaustive list of name/s under which the product/s as traded)	Scientific name	
1	- <u>Dill</u>		Anethumgraveolens L. <u>Column:</u> Part of the plant used: Leaves and tops, seeds	
<p>{SCH group name} may be:</p> <p>Add split beans and specify style pieces, or</p> <p>- [split beans]</p> <p>Other styles distinctly different from those [four five] are allowed, provided they are labeled accordingly.</p>				Mexico
<p>2.3 Sizing (optional)</p> <p>The provision "When sized, the methods used should be labelled on the package" requires additional clarification. It is not clear whether this is an explicit requirement for the producer to put such information on the packaging. For example, if a producer labels its product "vanilla pods that it is 15 cm length and above", is it necessary to indicate on the package how it was determined?</p>				European Union
3. ESSENTIAL COMPOSITION AND QUALITY FACTORS				

We recommend adding a General quality criteria. The following paragraph is proposed: The addition of adulterants and artificial coloring is not acceptable.	Venezuela Republic of) (Bolivarian
3.2 Quality criteria	
It should be considered which term to use: “Quality criteria” or “Quality factors”. In existing Codex standards (amended in 2022), e.g. standard for dried basil (CXS 345-2021) or standard for dried oregano (CXS 342-2021), this point is named “Quality factors”. Furthermore, in the heading of that paragraph (point 3) of this template and of the above-mentioned standards the term “ESSENTIAL COMPOSITION AND QUALITY FACTORS” is used. Therefore, we suggest to use the same terms and follow a consistent approach. Having regard to the above, in point 3.2 it should be consequently “quality factors” and not “quality criteria”.	European Union
3.2.2 Odour, flavour, and colour:	
3.2.2 Odour, flavour, and referring colour: <u>{SCH group name}</u> The product shall have a characteristic odour, flavour and colour, which can vary depending on geo-climatic factors/conditions, and shall be free from any foreign odour, flavour and colour especially from rancidity and mustiness. The colour of vanilla beans range from reddish to dark brown.	Mexico
<u>{SCH group name}</u> 3.2.2 Odour, flavour, and colour: {SCH group name} shall be free from any foreign odour or flavor, especially from mustiness. Each specific herb/spice in the {SCH group name} shall has its characteristic odour and flavor considering the in the {SCH group name} considering the geo-climatic factor/conditions, varieties and the main chemical components of the volatile oil indicated in Annex I, Table 1 – Chemical Characteristic. Rational: The SCH group doesn't has a characteristic odour and flavor, but each herb /spice in the same SCH group has its characteristic odour and flavour. Remarks to Section 3.2.2 Classification: Correct the section's numbering to be 3.2.3	Egypt
Comments on Section 3.2.2 “Classification”: - We agree that the classes Extra, Class I and Class 2 should be omitted.	Venezuela Republic of) (Bolivarian
3.2.3 Classification (optional)	

<p>3.2.3 Classification (optional) we are of the opinion that its inclusion does not bring any value as, more than a classification, it is to do with style - whole, pieces or ground/powdered, which is already covered in Section 2.2 Style.</p> <p>3.2.4 Physical and Chemical Characteristics</p> <p>With respect to Table 1. Chemical characteristics: In the table delete the column referring to Water insoluble Ash (%w/w) max. Keep the column Total Ash % weight/weight (max.) on dried basis, as the latter is insoluble in water.</p> <p>With respect to the column referring to Volatile oil markers % (min.) on dried basis, what is the reference methodology?</p> <p>If it is a methodology that is an alternative to Volatile oils, we would like to know if you have the data or values for different spices?</p> <p>With respect to Table 2. Physical characteristics: characteristics corresponding to:</p> <ul style="list-style-type: none"> • Mammalian excreta or other excreta mg/kg (max.) • Other excreta mg/kg (max.) <p>We recommend that this be combined into one, as 'other excreta' is mentioned in both.</p>	<p>Venezuela Republic of) (Bolivarian Republic of)</p>
<p>4. FOOD ADDITIVES</p>	
<p>Anticaking agents listed in Table 3 of the <i>General Standard for Food Additives</i> (CXS 192-1995) are acceptable for use in ground/powdered form of <u>{SCH group name}</u> or no food additives are permitted (as specified in other standards).</p> <p>The MSEU would suggest to include the option of prohibition, in order to emphasise that other standards may not permit the use of food additives (e.g. draft saffron standard) and modify the provision accordingly.</p>	<p>European Union</p>
<p>8 LABELLING</p>	
<p>8.1 Name of the product</p>	
<p>The MSEU suggest to follow the same approach as in existing standards and in the draft standard for saffron, i.e. to divide the "Name of the product" in sub-points (in this case in 8.1.1, 8.1.2 and 8.1.3).</p>	<p>European Union</p>
<p>8.2 Country of origin and country of harvest</p>	
<p>Please add the following sentence According to REP21/SCH- Paragraph 19:</p> <p>These provisions would be reconsidered in individual standards, should the need arise.</p>	<p>Iran</p>

Meanwhile, the country of harvest of some products shall be declared if its omission would mislead or deceive the consumer.	
Country of harvest (mandatory)	Mexico
8.3 Commercial identification	
<p>particle-size-size (optional)-. -Weight, if applicable</p> <p>To not delete in the specification for weight, that should be optional. It is commonly used in the commercialization of whole vanilla style.</p>	Mexico
9 METHODS OF ANALYSIS AND SAMPLING	
Annex I – Table 1: Chemical characteristics for {SCH group name}³	
<p>The MSEU consider that adding a note could clarify that the volatile oils values are related to natural spices, not to heat treated or subjected to other processes, that may reduce the natural content of volatile oil (this note should be included in all the standards as a generic remark).</p> <p>Furthermore, we 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.</p>	European Union
<p>Rearranging the properties of the head of table (1) Chemical characteristics to be as follows:</p> <ul style="list-style-type: none"> • Moisture content % w/w(max) • Total ash % w/w(max) on dry basis • Water insoluble 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 • Markers volatile oil % (min) on dry basis • Non-volatile ether extract % w/won dry basis. • Other factors <p><u>Rationale</u></p> <p>The columns should be arranged, grouping similar types next to each other for ease of use.</p>	Egypt
Mx. Editorial and technical comment to table 2, in accordance also with 2.2 Styles and with the information proposed by the countries that review the 1st Draft we suggest to add splits to form/style and delete the column in other factors.	Mexico

Annex I - Table [2]: Physical characteristics for {SCH group name}	
<ul style="list-style-type: none"> - “Live insects” Column - “Excreta mammalian and/other mg/kg (max)” Column <p>Rational: Those parameters should be acceptable only for raw materials that will be submitted for further processing. According with the brazilian regulation (RDC N° 623, MARCH 9 2022): “Art. 8 The tolerance limits for foreign matter in this Resolution are established for foods, including raw materials and ingredients, that will not undergo treatment to reduce or eliminate foreign matter”.</p> <p>There are two important considerations to be mentioned:</p> <ul style="list-style-type: none"> • We consider that the presence of “live insects” can compromise other foods around it. • The acceptance of a limit for “excreta mammalian” is not in accordance with the GENERAL PRINCIPLES OF FOOD HYGIENE CXC 1-1969 described in the “Section 6 Food Hygiene” of the document. The general principles established the necessity to control the source of hazard such as “faecal contamination – minimizes the potential for contamination with many foodborne pathogens such as Salmonella, Campylobacter, Yersinia, pathogenic strains of E. coli”. The presence of the excretas is an indication that the GHP is not being effective in managing the hazards along the food chain and no quantitative limit should be accepted. If mammalian excreta are found, it should be an obligation to carry out microbiological analyzes and propose a standard. <p>Brazil already discussed this position at previous CCSC sessions and understand to be of importance to discuss this recurring matter with the experts from Codex Committee of Food Hygiene, the SCH trade industry and national regulatory bodies.</p>	Brazil
<p>Rearranging the properties of the head of table (2) Physical characteristics to be as follows:</p> <ul style="list-style-type: none"> • -Extraneous matter % w/w (max) • -Foreign matter % w/w (max) • -Mould damage % w/w (max) • -Insect damage% w/w (max) whole only • Live insects • -Dead whole insects count/100 g (max) • -Insect fragments count/10 g • -Excreta mammalian mg/kg (max) • -Excreta, other mg/kg (max) • -Rodent filth count/25 g • -Broken (among whole style only) 	Egypt

<ul style="list-style-type: none"> • -Off-size (when sized) • -Other comments <p><u>Rationale :</u></p> <p>The columns should be arranged, grouping similar defect types next to each other for ease of use.</p> <p>Extraneous matter</p> <p>Adding the definition of Extraneous matter and foreign matter below the table (2) for clarification and to be align with the SCH standards.</p> <p>Excreta mammalian and /other mg/kg (max)</p> <p>Deleting "and/other" to be Excreta Mammalian mg/Kg Max</p>	
<p>It is not clear why the different physical characteristics listed in this table differ from other existing and draft standards.</p> <p>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.”</p>	<p>European Union</p>