



JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON SPICES AND CULINARY HERBS  
2<sup>nd</sup> Session

Goa, India, 14- 18 September 2015

PROPOSED DRAFT STANDARD FOR BLACK, WHITE, GREEN PEPPER (BWG PEPPER)

Comments at Step 3

Comments of Cameroon, Costa Rica, Japan, Nigeria, Sudan and Thailand

**CAMEROON**

Section 2: Description

2.1: Product Definition

2.5.1 Extraneous matter.

All materials from the specific plant other than Pepper berries, ~~irrespective of vegetative parts...~~ Light berries, pinheads or broken berries are no considered as extraneous matter.

**Rationale:** It is important to make it well understood that other materials than Pepper berries from plants other than *Piper nigrum* are not considered as extraneous matter.

Section 10: Methods of Analysis and Sampling

Table 5:

Piperine content % (m/m) Principle: Spectrophotometry ~~Spectrophotometric.~~

**COSTA RICA**

We support the advancing of proposed draft standard on BWG Pepper.

**JAPAN**

**(1) General Comments**

First of all, Japan appreciates India's dedicated work as the chair of the electronic working group on the proposed draft for BWG pepper and also having the opportunity to provide specific comments on the draft standard.

In general, Japan supports the development of this standard in view of protecting consumer's profit and ensuring fair food trade, but we would like to express our concern about quality factors as presented in underlined/bold font for new texts and ~~strike through font~~ for deletion below.

**(2) Specific Comments**

Japan suggests replacing values in section 3.2 Quality Factors as follows.

3.2 Quality Factors

The Quality factors for whole Black, White and Green Peppers are given below in Table shown as 1, 2 and 3.

Table 2. Physical Characteristics of BWG whole Peppers

Physical Characteristics	REQUIREMENTS								
	Black			White			Green		
	Class/Grade I	Class/Grade II	Class/Grade III	Class/Grade I	Class/Grade II	Class/Grade III	Class/Grade I	Class/Grade II	Class/Grade III
Bulk density, (g/l), min.	<del>570</del> <sup>550</sup>	<del>550</del> <sup>500</sup>	<del>500</del> <sup>450</sup>	600	600	600	NA	NA	NA
Light berries, % (m/m) max.	<del>0.5</del> <sup>2</sup>	<del>2</del> <sup>5</sup>	<del>5</del> <sup>10</sup>	1	2	2	NA	NA	NA
Extraneous matter, % (m/m) max.	<del>Nil</del> <sup>1</sup>	<del>1</del> <sup>2</sup>	2	<del>0.25</del> <sup>1</sup>	<del>0.25</del> <sup>1.5</sup>	<del>0.5</del> <sup>2</sup>	0.5	1	1.2
Black berries/corns % (by wt), max	NA	NA	NA	<del>Nil</del> <sup>5</sup>	<del>17.5</del> <sup>2</sup>	<del>2</del> <sup>10</sup>	Nil	Nil	5
Broken berries, % (by wt.), max.	NA	NA	NA	<del>1</del> <sup>2</sup>	<del>2</del> <sup>3</sup>	3	1	7	10
Mouldy Berries /Corns % (by wt), max.	<del>Nil</del> <sup>1</sup>	<del>1</del> <sup>3</sup>	3	<del>Nil</del> <sup>1</sup>	<del>1</del> <sup>3</sup>	<del>1</del> <sup>3</sup>	Nil	1	2
Insect defiled berries /Corns % (by wt), max.	<del>0.5</del> <sup>1</sup>	<del>1</del> <sup>2</sup>	2	<del>Nil</del> <sup>1</sup>	<del>1</del> <sup>2</sup>	2	Nil	1	2
Pinheads or broken berries, % (m/m), max.	<del>Nil</del> <sup>1</sup>	2	3	NA	NA	NA	NA	NA	NA

Table 3. Chemical Characteristics of BWG whole Peppers

Chemical Characteristics	REQUIREMENTS						
	Black			White			Green
	Class/Grade I	Class/Grade II	Class/Grade III	Class/Grade I	Class/Grade II	Class/Grade III	
Volatile oils, % (ml/100 g) min, on dry basis.	2.0	<del>2.0</del> <sup>1.5</sup>	<del>2.0</del> <sup>1.0</sup>	1.5	1.5	1.0	NA
Piperine content, % (m/m), min on dry basis	<del>5.0</del> <sup>3.5</sup>	<del>5.0</del> <sup>3.0</sup>	<del>5.0</del> <sup>2.0</sup>	4.0	<del>4.0</del> <sup>3.5</sup>	3.0	NA

Table 4. Chemical Characteristics of BW Ground Peppers

Chemical Characteristics	Ground Black pepper	Ground White pepper
Volatile oil % (ml/100g), on dry basis, min.	<del>1.5</del> <sup>1.0</sup>	0.7
Piperine % (m/m), on dry basis, min	<del>4.0</del> <sup>3.5</sup>	4.0

Japan is not of the view of establishing too strict standards which lead to prevent the trade, but believes it is not appropriate to establish too lax standard from the point of view of protecting consumer's profit. Japan thinks the requirement in the proposed draft standard should set stricter values as presented above from the point of view of protecting consumer's profit. We believe our modification would be consistent with preexisting regulatory practices of some member countries including Japan.

## NIGERIA

We support the work to develop a standard for Black, white, Green Pepper taking into consideration, the comments on scope and styles as outlined below.

**Justification:** The standard will provide the quality characteristics and grading necessary to facilitate trade.

### Comments on Annex 1

<p><b>1. SCOPE</b> This standard applies to three commercial forms of Pepper (Black, White and Green – abbreviated as BWG) from harvested berries of <i>Piper nigrum</i> L of the Piperaceae family.* This standard applies to dried or dehydrated peppers intended for food processing and for direct human consumption, <del>including for catering purposes</del> or for retailing. It does not apply to the product when indicated as being intended for further processing.</p>
<p><b>Justification</b> Delete “catering purposes” as this is covered by direct human consumption.</p>
<p><b>2.2 Styles</b> <b>Bullet b</b> b. Cracked /crushed – cracked/crushed <b><i>in a</i></b> BW pepper berries that are retained sieve of a nominal aperture size of 500 µm.</p>
<p><b>2.4 Trade Classes/Grades:</b> In accordance with the Physical and Chemical Characteristics in sections 3.2.4– 3.2.6 BWG pepper are classified into the following three <del>classes</del>/grades: Class/Grade I Class/Grade II Class/Grade III</p>
<p><b>Justification</b> Alignment to practices in commodity gradings</p>

## SUDAN

### 1- Scope:

#### Comment:

Sudan would like to change the proposed scope to read as follows:

This Standards applies to different forms of dried whole pepper fruits (berries) (*Pepper nigrum* L.), of family Piperaceae ; employed for Culinary, food Seasoning and food processing purposes of uses. But does not apply to semi-processed, fully-processed and any other products based or derived from pepper.

#### Justification:

\* The phrase; Direct human consumption is not suitable because whole means crude unmanufactured, and the pepper usually used grounded ore processed in food before consumed in their whole fruit form.

\* The phrase; for catering purposes is not suitable because catering means delivery of food not preparation.

\*The fruits of pepper botanically called berries.

### 2- Description:

#### 2.1- Product Definition:

#### Comment:

We propose the following definitions:

*Black pepper:* is unripe pepper fruits (berries) dried under direct sun.

*White pepper:* is ripped fruits (berries) with the red skin removed and bleached and dried under direct sun.

*Green pepper:* is pickled or freeze dried fresh green fruits (berries).

**Justification:**

The specific process by which the pepper are produced is critical and important in defining the product although they are produced from the same origin

**2.2-Style****Comment:**

The word Style is not suitable; we propose instead the word Form.

**Justification:**

Word Style indicates distinctive characteristics of anything (product) but not different forms of the same product.

**2.5- Definitions (for terms used under 3.2.4 of Table 2)**

2.5.1-. Extraneous matter:

**Comment:**

It is proposed to define it as: All matters other than pepper berries and vegetative parts from the same plants.

**Justification:**

Because vegetative parts from the same plants are **impurities** not **extraneous matter**.

**THAILAND****General Comments on Agenda Item 4 -7: Proposed Draft Standard**

In general, Thailand has no objection on the proposed documents. However, we do consider that the format of the four proposed draft standards should be in accordance with Codex Procedural Manual and the consistency of all foresaid documents should be in concerned. In addition, we would like to provide some suggestions as described below:

1. The scope of the commodity standards for spices and culinary herbs should have similar writing style, by which covering the objectives of direct (human) consumption only and not applying to the product when indicated as being intended for further processing. The phrases “intended for food processing” or “catering purpose” are redundant due to the fact that the meanings of these phrases have already described by the term “direct consumption”. Moreover, the scope may only define the products that are prepackaged for sale. Therefore, the terms “for retailing” or “for repacking” are unnecessary.
2. We disagree with the existing of Section: Packaging and Storage (Section 9 of the Proposed Draft Standard for BWG Pepper) and Section: Packaging and Presentation (Section 8 of the Proposed Draft Standard for Oregano) because the packaging and storage practices have already been described in Code of Hygienic Practice for Spices and Dried Aromatic Herbs (CAC/RCP 42-1995) as defined in Section: Food Hygiene.
3. We disagree to use some of the physical or chemical characteristics that are slightly difference for the classification. Only some of the critical quality parameters that are clearly difference for classification should be considered and slightly different parameters may be used as the minimum, or maximum, or ranges of acceptance values.
4. We would like to propose that the definitions of extraneous matters and foreign matters for all of the proposed draft standard should be similar. Different meanings among the proposed draft standards may lead to confusion, for example, the extraneous matters in pepper include soils, while those in cumin and oregano are excluding. In addition, maximum % mass fraction of extraneous matters, foreign matters, or insect damage matters should not be used as the classification parameters. In fact, these parameters should be defined in Section: Defects that determine the required minimum acceptance.
5. We would like to propose to amend Section 4: Food Additives. The use of Food Additives in spices and culinary herbs should be conformed to GSFA. The text may be revised as follows:

“~~4.1 No food additives or~~ flavourings are permitted in the products covered by the standard.

**4.2 Food additives used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) for Food Category 12.2 Herbs, spices, seasonings, and condiments (e.g. seasoning for instant noodles) are acceptable for using in foods conforming to this Standard.”**

**Agenda Item 4:** Proposed Draft Standard for Black, White and Green Pepper

1. Red Pepper should not be included in the Product Definition as the trade volumes are too small.
2. We agree with the basic parameters of whole pepper's general size/shape as described by diameters due to the fact that black and white peppers produced in Thailand are in accordance with the defined ranges.
3. We would like to propose to remove Physical Characteristic: Whole insects, Dead or/and Alive, and Mammalian or/and Other excreta in Table 2 and reassign in the new heading described under Infestation, which is similar to other proposed draft standards. For example:

**“3.2.1 Infestation: BWG shall be free from live insects and practically free from dead insects, insect fragments and rodent contaminations visible to the naked eye (corrected, if necessary, for abnormal vision)”**

4. We would like to propose to amend the moisture content of ground black and white pepper in Table 4 to be in accordance with ISO 959, which is defined at 13% and 14%, respectively.
5. We would like to propose the working group to consider adding the analysis method for salt content in Table 5 as the salt content for green pepper has already been indicated in Table 3, but has not yet provided the analysis method.