



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

Sixth Session

Virtual

26-30 September and 3 October 2022

Draft Standard for dried nutmeg

(Comments from Chile, Grenada, Malaysia, Morocco, Saudi Arabia, Syria, Tanzania and Uganda)

Chile

De acuerdo con los Principios para el establecimiento de métodos de análisis del Codex y Métodos de análisis y muestreo, se realizan comentarios a los métodos analíticos propuestos a los que se hace referencia en los anteproyectos de normas.

Parámetro	Método	Principio	Tipo	Comentario
Contenido de humedad	ISO 939	Destilación	I	Se propone además incluir como tipo II equivalente a ISO 939, al Método AOAC 986.21.
Cenizas totales	ISO 928	Gravimetría	I	Se sugiere mejorar el principio de medición, debería decir "Calcinación-Gravimetría".
Cenizas insolubles en ácido	ISO 930	Gravimetría	I	Se sugiere mejorar el principio de medición, debería decir "Calcinación-Gravimetría-Digestión ácida".
Cenizas insolubles en agua	ISO 929	Gravimetría	I	Se sugiere mejorar el principio de medición, debería decir "Calcinación-Gravimetría-Digestión ácida".
Contenido de aceites volátiles	ISO 6571	Destilación	I	Se sugiere incluir método AOAC 962.17 como tipo II.
Contenido de calcio expresado como CaO	ISO 1003	Titulación	I	Se recomienda tipificar como tipo III, y no como I, ya que su validación es para una matriz diferente. Es un método para raíz de jengibre.
Materia extraña	ISO 927	Examen visual/ Gravimetría	I	Mejorar descripción del principio más acorde a lo señalado en el método. Debería decir "Examen Visual".
Materia foránea	ISO 927	Examen visual/ Gravimetría	I	Mejorar descripción del principio más acorde a lo señalado en el método. Debería decir "Examen Visual".
Moho visible	ISO 927	Examen visual	IV	Para Nuez Moscada en polvo, se sugiere incluir el método AOAC 945.94 que se utiliza en especies molidas.

Grenada

Issue: CCSCH6 will discuss the Draft Standard for Nutmeg

Background: Grenada was invited to participate in discussion on CL 2021/51/OCS - SCH - Request for

Comments, at Step 5, on draft Standard for dried seeds – Nutmeg on October 6th, 2021. Since then there has been active participation on the proposed standard.

A Draft Standard for Dried Seed – 2nd Circulation was submitted for perusal and comments on February 26th 2022. Grenada also actively participated in this round of discussion. This document has now reached the stage for proposed adoption at Step 6.

We are in favour of the passing of a document that will guide the nutmeg industry. However, we are of the firm belief that in its current form, this document would prove prejudicial to the Grenada's nutmeg.

In light of this we hereby submit the following comments.

Grenada's Position:

Clause 1. SCOPE

Issue and Rationale: Scope is not specific enough in its coverage. Referring to the heading, it states **Dried Seeds – Nutmeg**. However the standard then included ground/powdered seed. It is our opinion that once in powdered form, the nutmeg is no longer a seed and hence it falls out of the scope of the document.

Suggestion from vWG: Table concerns to Codex Committee

Proposal: ***The Codex Committee redefines the Terms of Reference for the Scope of the draft proposal, taking into consideration that the document addresses Dried Seeds – Nutmeg and not seed and powder.***

***Rewording the scope:** This Standard applies to dried seeds, in their dried or dehydrated form as spices, whole or in pieces, 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 seeds for industrial processing and nutmeg in powdered/ground form.*

Clause 2 Section 2.1.1. Product definitions

Issue and Rationale: The phrase “**Appropriate degree of development**” is vague and can leave room for manipulation. Hence we propose a change of definition.

Proposal: ***Grenada recommends substituting the phrase with: Having the mature pericarp opened naturally (not opened manually or mechanically) and the red aril known as mace is clearly visible and formed.***

Clause 2 Section 2.1.2. Product definitions, Section 2.2. Styles and Section 2.3 Sizing

Issue and Rationale: The length and width of the standard proposed would eliminate all of Grenada's nutmeg. While it may fit length it would not fit in diameter.

Proposal: Eliminate sizes. Trading practices would govern the sizes required. A nutmeg is a nutmeg irrespective of size. The intrinsic qualities (chemical and physical characteristics etc) should be the key factor. The intrinsic qualities are the same regardless of size. Size as a delimiting factor is therefore, in our opinion irrelevant and should be removed from this proposed standard.

Proposed paragraph: Nutmeg has a variety of shapes from ovoid to broadly ovoid. Nutmeg kernels have a slightly wrinkled like surface. Inshell nutmeg seeds may rattle due to the seed's shrinkage within the shell in the drying process.

Clause 2 Section 2.2.4. Grounded/powdered seed

Issue and Rationale: Grenada considers nutmeg to be a raw Agricultural product, a seed in its truest form. Grounded/powdered seed is considered industrially processed. Standard refers to DRIED SEEDS which is solid. Whether whole or broken, it isn't a powder. It does not include powder.

Proposal: Clause 2.2.4 Grounded/powdered seed should not be included as a style of Dried seeds – Nutmeg.

Clause 4. Food Additives

Issue and Rationale: This standard is for Dried Seeds – Nutmeg. Seeds or broken seeds do not cake and as such there is no need for anti-caking agents. Whilst inclusion of food additives may be standard requirements as per the template, there is no justification for inclusion.

Proposal: No additives shall be applied to dried seeds as proposed.

Clause 8 Section 8.5. Labelling of non-retail containers

Issue and Rationale: Net quantity (weight/amount) should be included as guided by current trade practices

Proposal: **Proposed paragraph:** *Information for non-retail containers shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, net quantity (weight/amount) and the name and address of the manufacturer, packer, distributor or importer, as well as storage instructions, shall appear on the container. However, lot identification, and the name and address of the manufacturer, packer, distributor or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.*

Annex I. Table 2. Chemical Characteristics for Whole, Broken and Ground/Powdered Nutmeg

Issue and Rationale: As it relates to the specification for Calcium Oxide, Grenada acknowledges the recommendation of 0.35%, as it is also stated in our Grenada National Standard GDS 60:2001. However, it should be noted that the world is becoming more health conscious and demand food containing the least amount of additives and preservatives as possible. The use of CaO can have deleterious effects to the consumer <https://nj.gov/health/eoh/rtkweb/documents/fs/0325.pdf>

Proposal: We therefore propose that the limit should be lowered to 0.05 (% mass fraction).

Annex I. Table 3. Physical characteristics for Nutmeg

Issue and Rationale: In terms of “Mould visible” we recommend the values stated in the previously circulated, Grenada National Standard GDS 60:2001 of not more than 5 (% w/w) for broken nutmeg. It is known of the correlation between the presence of mould and the likelihood of the development of aflatoxins, which by nature are carcinogenic. It is also very evident that allowances for the presence of aflatoxins are becoming more restrictive, especially from buyers/clients globally. We would therefore recommend that we adopt a more restrictive allowance for mould in order to satisfy the expectations of clients and other stakeholders.

Proposal: Grenada maintains our stance of not more than 5 (% w/w) for broken nutmeg in keeping with the National Standard for Dried Nutmeg and Mace.

We wish to place on record that the comments emanating from Grenada are informed by the Grenada Co-operative Nutmeg Association, the sole authority on the production and exportation of Nutmeg. These comments are based on lived experience and evidence of over seven decades working in the Nutmeg Industry.

Referring to previous explanations, we firmly believe that the clauses, specifically relating to the scope and the definition for styles, in this standard are in fact irrelevant and not reflective of the realities that producers, exporters and traders currently face.

As it relates to maturity of crop, (Appropriate degree of development), use of Calcium oxide and the presence of mould in nutmeg, it is our grave concern that we may in fact be providing an opening on the market, for a product that is of lower quality, to become the gold standard of this vital and noble nutmeg industry. We must also remember that a greater allowance for mould would imply a greater proliferation in the final product. Aflatoxins are resistant to heat and other forms of industrial processes.

We are conscious of the fact that our clients and by extension consumers are becoming more proactive in their approach to leading healthier lifestyles. Based on this, we dread to think of the bad consequences the entire nutmeg industry can face, once it is known that as a body we would have allowed substandard products to become available for consumption.

It is therefore our humble recommendation that the parameters for mould visible and Calcium oxide be revisited.

We also recognise that many of our comments have been explained referring to the standard template of the current Codex format. We wish to reiterate that these requirements – styles, sizing, are not a true representation of current practices in Grenada.

Grenada thanks you for the progress you have made thus far in trying to formulate a standard that will be beneficial to all and do trust that our comments and recommendations would be duly considered.

Malaysia

MALAYSIA PROPOSAL	
<p>8.5 Labelling of non-retail Containers</p> <p>Information for non-retail containers shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer, country of origin, packer, distributor or importer, as well as storage instructions, shall appear on the container. However, lot identification, and the name and address of the manufacturer, country of origin, packer, distributor or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.</p> <p><u>The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021)</i>.</u></p>	<p>To consider the request from CAC44 to update the provisions for labelling of non-retail containers in draft standard in light of the new standard for the labelling of non-retail containers.</p>

Morocco

Le Maroc n'a pas d'objection pour avancer les travaux de ce projet de norme.

Saudi Arabia

General Comment:

Saudi Arabia reiterates its concern regarding the safety of nutmeg and mace since this product contains "myristicin and methoxysafrole" which may have detrimental effect on health.

Saudi Arabia also suggests forwarding the mentioned components of nutmeg as well as nutmeg in whole to be evaluated for its safety as a flavor agent and / or to set maximum levels for its use through JECFA.

Syria

GENERAL COMMENT:

Unfortunately, Syria Arab Republic could not be able to share its comments on agenda 4.1 (step 3, Step 4..etc) with Codex Alimentarius Commission, but Syria Arab Republic Would like now to provide its comments on agenda 4.1, and hope to put its comments in consideration, especially that Syria Arab Republic import this spice.

SPECIFIC COMMENT:ANNEX II /Table 3: Physical characteristics:

For dead whole insects count/ 100g (max) it could not be 4, we found this high, also it could not be NA.

For insect fragments, count/10 g(max) it could not be NA for any style of nutmeg, and could not be 100 like in (shelled seed. without shell, broken), that is too high for human consumption.

For rodent contamination (hair) count/10g (max), it should be specific value and more close to zero not NA, also for mammalian and or other excreta, mg/kg (max). If any spices have rodent contamination that indicates poor hygiene and sanitation practices.

Syria Arab Republic propose the WG to review the physical characteristics.

Tanzania

Scope

Comment: Introduce the scientific name of the Nutmeg seed under the scope.

Rationale:

For its relevance.

2.1.1

Comment: Delete Table 1.

Rationale: The information will be captured under the scope and under the definition of term thus considered as a repetition.

3.1, 3.2.2 and 3.2.3

Comment: Delete the referenced annexes within the statement that implies the tables and introduce the tables for chemical and physical characteristics subsequently after the sub clause.

Rationale: For clarity and easy of implementation to standards user since the annexes might be considered as informative.

Uganda

Uganda appreciates and takes note of the report provided by the EWG that worked on the draft standard for nutmeg.

Uganda deliberated on the standard and generated the following comments:

1. under clause 2.1, Uganda suggests that table 1 is deleted and rather add the scientific name to the definition
2. Uganda also agrees that the word "...table 1..." is deleted.

Proposed changes:

The clause without table 1

"...of *Myristica fragrans* of the Myristicaceae family,.....";

Justification:

The common and scientific names are better represented in the text other than the table. 2.1.1.

3. Uganda recommends that the word "...Houtt..." is added to the scientific name under sub clause 2.1.1 having recommended that the table 1 be deleted.

Justification

The word is part of the scientific name for nutmeg

Proposed change

"...of *Myristica fragrans* Houtt of the Myristicaceae family,.....";

4. Uganda recommended earlier that the table 1 is deleted thus the need to renumber the remaining tables as tables "1 and 2" respectively.
5. Uganda recommends that the statement "...Annex III Spices and Aromatic Herbs..." is added to the existing brackets

Justification

The statement is hanging therefore confusing whether it is part of the statement or on its own

Proposed changes

“...(CXC 75-2015 Annex III Spices and Aromatic Herbs)....”

6. For clause 8.5, Uganda recommends that the standard for labelling of non-retail containers be referenced to rather than extracting statements from the said standard.

Justification

To be consistent with the language in the guidelines for non-retail containers.

The proposed changes to read as

The proposed changes to read as “The labelling of non-retail containers should be in accordance with the General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021)...”