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FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 3(b)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Fifteenth Session, Seoul, Republic of Korea, 21-24 November 2006

PROPOSED DRAFT STANDARD FOR GINSENG PRODUCTS

COMMENTS AT STEP 3 (IADSA)

IADSA

IADSA would like to provide the following comments on the Circular letter CL 2006/3-ASIA circulated by the Codex Secretariat following the decision of the Codex Alimentarius Commission to return the Proposed Draft Standard for Ginseng Products for comments at Step 3 and its request that the Codex Coordinating Committee for Asia address the issues raised at the 28th Session of the Codex Alimentarius Commission.

1. GENERAL COMMENT

As a first and general comment, IADSA would like to bring the attention of the Commission to the fact that taking into account its characteristics and the way it is being developed, this draft standard should focus on *Panax ginseng* and therefore the standard should only regulate this specific species of ginseng.

This would facilitate to advance in the development of this standard as integrating all species of ginseng in one standard would require scientific expertise that Codex does not have at this moment in time. Therefore it should be replaced the word "ginseng" with '*Panax ginseng*' every time it appears throughout the text. The title should then read Proposed Draft Standard for Panax ginseng Products.

2. SPECIFIC COMMENTS

In addition, IADSA provides the following comments addressing the different issues concerning the current draft standard for ginseng products.

A. Concerning Existing Standards for Ginseng

The draft standard at Step 3 has modified some of the standards set in the World Health Organisation (WHO) monograph for Panax ginseng. In particular, total ash (an indication of purity) is limited to 4.2% in the WHO document (which is consistent with the Japanese Pharmacopoeia) while the draft standard would allow 6.0%.

B. Clarity

Many of the issues identified as lacking clarity have now been resolved. Nevertheless, additional points made in the comments filed on the previous draft at Step 3 are still of concern:

- *Scientific names*. The species *Panax ginseng* C.A. Meyer was recorded in some older texts as *Panax schinseng* T. Nees and the plant is still occasionally referred to that older name. For greatest clarity, the first mention of the species should be written as "*Panax ginseng* C.A. Meyer, syn. *P. schinseng* T. Nees". On the other hand, the draft at Step 3 still excludes *Panax japonicus.*

- *Extraction solvents are narrowly defined*. The definition of “ginseng extract products” continues to be limited to those that are “manufactured by extracting soluble components of the dried ginseng root…using water and/or ethanol…” There are several other solvents that can be used in the processing of ginseng extracts and there is no reason to imply that those made with water and/or ethanol are superior, or that other solvents can not be used. No scientific rationale is presented to support this unnecessary limitation.

  Therefore IADSA would like to propose to replace in section 2.1.2 the words “using water and/or ethanol” by ‘using water and/or appropriate food-grade organic solvent’.

C. New concerns identified in the draft standards at Step 3

Several additional concerns should be addressed in relation to the draft proposed standard at Step 3. These include:

- Given current specific concerns on contamination of ginseng, it must be argued that the standard proposed for pesticides is not sufficiently specific. The use of illegal fungicides, especially pentachloronitrobenzene (PCNB, or quintozene) has been broadly reported for at least five years. If a standard is developed this should be meaningful, address known problems and should be flexible enough to account for newly emerging issues.

- The draft at Step 3 states that the minimum fill must be “not less than 97%.” This is not sufficient and it should be required 100% of the listed amount of all added ingredients to be present in the product.

- The “labelling” section of the current draft would require the name of a ginseng ingredient to be either “white ginseng;” “red ginseng;” “white ginseng extract;” or “red ginseng extract.” This standard would not be in conformity with many national labelling regulations for dietary supplements that contain ginseng. Section 7.1 should be modified as follows: ‘The name of the product types shall be “White Asian Ginseng”, “Red Asian Ginseng”, “White Asian Ginseng Extract Products”, or “Red Asian Ginseng Extract Product”’.

- There is almost certainly resistance to the precedent of “country-of-origin” labelling. If this becomes required for ginseng, when does it become required for the other ingredients in herbal dietary supplements? … and what does the label look like if a manufacturer of a dietary supplement (or a food for that matter) must disclose country-of-origin for all ingredients? Section 7.2 should be deleted.

- The same concern as above exists for the requirement for the inclusion of the scientific name on labels. In some countries the use of scientific names is required only if there is not a “standardised common name” established for a species in the reference that has been “incorporated by reference” in national regulations.

The requirement in section 7.4 that ginseng products must be labelled with clear markings that they are not intended for medicinal purposes (and are used for specified population groups) is redundant and unnecessary. Any requirement to include additional information on a small package is always cause for concern. Section 7.4 should be deleted.