

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
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Agenda Item 3.1 CX/SCH 19/4/3 Add.1

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

FourthSession

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### PROPOSED DRAFT STANDARD FOR DRIED OREGANO Comments at Step 3 (Replies to CL 2018/54/OCS-SCH)

*Comments of Colombia, European Union, India, Japan, Kenya, Mexico, Philippines, United States of America and Zambia*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2018/54/OCS-SCH issued in July 2018. 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 appendix

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

## APPENDIX I

## Proposed Draft Standard for Dried Oregano, - Comments at Step 3 (Replies to CL 2018/54/OCS-SCH)

GENERAL COMMENT	MEMBER/OBSERVER
<p>The EUMS considers that the proposed draft standard for dried oregano could be a good basis for discussion in CCSCH4. The three rounds of consultation gave the opportunity to discuss divergent views and find a compromise for a stand-alone standard for oregano.</p> <p>The EUMS are in favour of a stand-alone standard for oregano. The EUMS believe that a stand-alone standard for oregano has the advantage of being more detailed, whereas a group standard would provide only for minimum requirements for all oregano varieties leaving quality specifications open to different interpretations.</p>	<p><b>European Union</b></p>
<p>The United States of America would like to remind the committee that CCSCH and all of its working groups should make greater use of the grouping method for development of its standards- approved at 3rd CCSCH Session in February 2017 in Chennai, India. CCSCH must undertake standard development in a timely manner that yields relevance to its stakeholders. The standard development process is not solely an academic exercise, these standards affect impact the livelihood of masses worldwide. Developing CCSCH standards in the current manner is not efficient by any measure, nor is it responsive to needs of governments, trade and consumers.</p> <p>In this regard, CCSCH must be more efficient in its standard development, it must utilize the economic resources of member countries, and as well as being more responsive to the needs of its stakeholders in its operations bearing in mind: (i) CCSCH members identified one hundred and thirteen (113) generic named spices and culinary herbs for standardization. (ii) With a work load of four (4) standards per session, completion of a standard for every Spice and Culinary Herb identified would take the CCSCH a minimum of 20 sessions over 36-40 years to complete; Which raises the issue of relevance of CCSCH standards the stakeholders.</p> <p>The Grouping format agreed upon is almost identical to that of the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005)- This standard is for ninety-four different fruit juices and nectars was developed in less than ten years; one of the most successful standardization undertaking of Codex Alimentarius. Therefore, the committee is encouraged to be more efficient in this era of limited resources and act in a manner that demonstrate its relevance to stake holders. The CCSCH must decide either to embrace the grouping standardization format agreed to or find another more efficient method to address the timely delivery of standards to member countries. It must handle the development of its standards to meet the needs of its stakeholders as a priority rather than an academic exercise.</p>	<p><b>USA</b></p>
<p>Zambia does not have a standard for Oregano, however, as a country, Zambia normally adopts the codex standards and domesticates them into National Food safety standards. The country is in the process of reviewing the food safety laws which will include regulations which has standards for various foods. There is need to widen the foods and additives to be covered in the regulations. Therefore, this standard for Oregano is fine as long as chemical, pesticides, heavy metals , microbiology parameters are considered in the standard</p>	<p><b>Zambia</b></p>

SPECIFIC COMMENTS	MEMBER / OBSERVER AND RATIONALE
<b>1 SCOPE</b>	
<p>This Standard applies to the <del>hojas secas/flores</del> dried leaves/flowers of oregano, defined in Section 2.1, below, which are offered for direct consumption, as an ingredient in food processing or <del>for repackaging, if necessary</del> <b>or for repackaging</b>, if necessary. Dry oregano is excluded intended for <b>an</b> industrial processing <b>different to what is indicated</b>.</p>	<p><b>Colombia</b></p> <p>Colombia considers it appropriate to adjust the translation to Spanish "dried leaves / flowers", with the correct ""hojas/flores secas".</p> <p>The change seeks to clarify and delimit the scope of application, because by only indicating that it is for "direct consumption", it could be understood that the food may or may not be packed or packaged. Thus, it is considered that the expression "or for repackaging, if necessary", does not establish a specific criterion to determine the specific situation in which the product is located. Likewise, it is considered pertinent to adjust the wording of the last paragraph in order to give greater clarity to determine the specific situation in which the rule is not applicable.</p>
<p>This Standard applies to dried leaves/flowers of oregano defined in Section 2.1 below offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes dried oregano intended for industrial processing.</p>	<p><b>Philippines</b></p> <p>We would like to seek clarification on the definition of industrial processing used in the sentence of the proposed draft.</p>
<b>2 DESCRIPTION</b>	
<p><b>2.1 Product Definition</b></p>	<p><b>European Union</b></p> <p>Section 2 – Description</p> <p>In Table 1, the first column titled "Specific name" should be renamed to "Commonly used specific name" to clearly indicate that it corresponds to names commonly used in trade.</p> <p>Table 1 plays a pivotal role in the standard for oregano, thus all entries should be checked thoroughly. The EUMS are concerned about a few common names, which do not seem to be adequately substantiated. Clarifications are therefore sought on the issues below:</p> <ol style="list-style-type: none"> <li>1. Oikea oregano: this name appears in Mansfeld's database as the common name for <i>Origanum onites</i> L.. However, no other scientific sources can be found to substantiate this common name.</li> <li>2. <i>Origanum x majoricum</i> Cambess is a hybrid of <i>O. majorana</i> L. x <i>O. vulgare</i> L. ssp <i>virens</i>, which is linked to "Italian oregano" in Mansfeld's database. It seems that CCSC2 decided to exclude <i>Oregano majoranum</i> from the draft standard for oregano. We wonder whether <i>Oregano majoranum</i> should be included in Table 1.</li> <li>3. According to the Euro+Med plant database<sup>1)</sup>, <i>Origanum vulgare</i> subsp. <i>virens</i> grows on the Iberian peninsula and Marocco<sup>2)</sup>. Thus we wonder whether a different common name should be used for it.</li> </ol> <p>In addition, the EUMS consider that in Table 1, should read as follows:</p> <p>Turkish oregano (?)      <i>Origanum vulgare</i> subsp. <i>Virens</i></p> <p>Greek oregano      <i>Origanum vulgare</i> subsp. <i>Hirtum</i></p> <ol style="list-style-type: none"> <li>4. The full scientific name of <i>Origanum vulgare</i> subsp. <i>hirtum</i> is <i>Origanum vulgare</i> subsp. <i>hirtum</i> (Link) letsw .</li> </ol> <p>1) <a href="https://npgsweb.ars-grin.gov/gringlobal/taxonomydetail.aspx?id=430877">https://npgsweb.ars-grin.gov/gringlobal/taxonomydetail.aspx?id=430877</a></p> <p>2) § 24 The Committee did not endorse the sampling plans since the values in the table did not correspond to those recommended in the General Guidelines on Sampling (CAC/GL 50-2004). It was unclear whether the sampling plan provided were being applied to attributes or variable characteristics and requested CCSC2 to reconsider the values in line with GL50. The Committee also agreed to</p>

	inform CCSCH that it would be providing commodity committees with a template for developing sampling plans in case the Committee would like to await developing sampling plans until such time CCMAS would provide the aforesaid template.
Dried oregano is the product obtained from the leaves and the <del>flowering tops</del> flowers of plants listed in <del>chart (cuadro)</del> Table 1 and processed in an appropriate manner, undergoing operations such as cleaning, drying, rubbing, and sifting. <b>Table 1.</b> Dried Culinary Herbs covered by this standard	<b>Colombia</b> Colombia considers it appropriate to adjust the translation to Spanish, replacing the text "sumidades floridas" with "flores". Also, delete the text "Cuadro 2" and replace it with "Table 2"; in order to give a better interpretation and clarity to the document.
Dried oregano is the product obtained from the leaves and the <del>flowering tops</del> flowers of plants listed in Table 1 and processed in an appropriate manner, undergoing operations such as cleaning, drying, rubbing, and sifting. <b>Table 1.</b> Dried Culinary Herbs covered by this standard	<b>Philippines</b> We suggest that for consistency from the scope, the term flowers should be used instead of flowering tops.
<b>Table 1.</b> Dried Culinary Herbs covered by this standard	<b>Philippines</b> The Philippines proposes the deletion of Italian oregano – Origanum x majoricum Cambes. Cretan oregano - Origanum onites L. Syrian oregano – Origanum syriacum L. Turkish sword oregano – Satureja Montana L. and Lippia in the table of the proposed draft. Rationale: In consideration that the proposal is mainly on the oregano (Origanum vulgare), it is recommended that the other species like Italian oregano, Cretan oregano, Syrian oregano, Turkish sword oregano and Lippia should be removed.
<del>General name</del> <b>It's suggested to eliminate the first column in the table 1</b>	<b>Mexico</b> It's suggested to eliminate the first column in the table 1. due the general name is oregano, and throughout the standard reference is made only to oregano (in wich Lippia it's included)
<i>Origanum vulgare</i> subs <i>hirtum</i> .	<b>Philippines</b> The Philippines supports the scientific name of Greek Oregano, Origanum vulgare subs. Hirtum. However, the scientific name has no author. Link was the first one who gave the scientific name of Greek oregano and was revised by letsw. Hence, the complete scientific name should be Origanum vulgare subs. Hirtum (Link) letsw. Rationale: Origanum vulgare subs. Hirtum (Link) letsw. was acceptable based on the website, Plant List.
Mexican oregano <i>Origanum vulgare</i> L. <i>Origanum mejorana</i> L.	<b>Mexico</b>
<i>Poliomintha longiflora</i>	<b>USA</b> Poliomintha longiflora from the table for it is not a member of the Lippia family. The table is revised using the correct binomial nomenclature (reference – Mansfield's World Database of Agricultural and Horticultural Crops)
<i>Poliomintha longiflora</i> <i>Poliomintha bustamanta</i> Turner	<b>Mexico</b>

<p><i>Poliomintha dendrítica Turner</i>  <i>Hyptis suaveolens (L.) Poit</i>  <i>Brickelia veronicaefolia H.B.K</i>  <i>Calamiuta potosina Schaff</i>  <i>Dalea greggi Gray</i>  <i>Gardoquia micomerioide Helmsl (Shaffner)</i>  <i>Hedeoma floribunda Standl</i>  <i>Lantana involucrata L</i>  <i>Lantana velutina Mart</i>  <i>Monarda austromontana Epl</i>  <i>Monarda citriodora Cerv</i>  <i>Paliomintha longiflora Gray</i></p>	
<i>Poliomintha longiflora longiflora Gray</i>	<b>Mexico</b>
<del>Whole</del> Whole/Intact	<b>Mexico</b> To maintain agreement with the standards issued by the committee.
<del>Picado/frotado</del> Picado/triturado: Crushed/Rubbed: processed into varying degrees ranging from a coarse to fine crush	<b>Colombia</b> Colombia considers it pertinent to change the term "frotado", to "triturado", in order to give greater clarity to the text.
Ground/Powdered: processed into <del>powders</del> powders The particle size of pieces and ground/powdered styles is determined by contractual agreement between buyer and seller.	<b>USA</b>
Ground/Powdered: processed into <del>powders</del> Powder	<b>Colombia</b> In point c) it is pertinent to eliminate the letter "s" at the end of the word "powder".
<b>3 ESSENTIAL COMPOSITION AND QUALITY FACTORS</b>	
<b>3 ESSENTIAL COMPOSITION AND QUALITY FACTORS</b>	<b>European Union</b> Section 3 - Essential composition and quality factors <ul style="list-style-type: none"> <li>In relation to the volatile oil content of oregano, the EUMS would like to express their preference to the following values, which allow a clear distinction between the different quality classes:  Class / grade I: min 2.0 ml/100 g (dry basis),  Class / Grade II: min 1.5 ml/100 g (dry base).</li> </ul>
Dried oregano <del>shall</del> <u>may</u> have a characteristic odour and flavor (fragrant, warm, unpungent and bitter flavor) varying according to the chemical strain of the main components of the volatile oil (carvacrol and/or thymol), which can vary depending on geo-climatic factors/conditions. Dried oregano shall be free from any foreign odour or flavor and especially from mustiness. Dried oregano shall have a characteristic colour varying from pale greyish yellow green to dark green.	<b>Mexico</b> Redaction proposed to give consistency between the text in other standards like in dried thyme. (CXS 328-2017)
Whole, Crushed/Rubbed oregano <del>are</del> <u>maybe</u> classified in three	<b>USA</b>

classes/grades according physical and chemical requirements as specified in Table 2 and 3, respectively.	The mandatory classification of dried oregano into three classes is not practiced universally. Therefore, it is imperative that the standard incorporate the different existing trade practices.
- Class/Grade II <u>When Dried oregano unclassified/ungraded, the provisions for Class/Grade II requirements apply as the minimum requirements</u>	<b>USA</b>
<b>3.2.4 Physical Characteristics</b>	<b>USA</b> Some of the tolerances for Physical Characteristics in the Table are inconsistent with trade and regulatory practices.
Whole, Crushed/Rubbed <del>picado/frotado</del> <del>picado/triturado</del> and Ground oregano shall comply with the physical requirements specified in Table 2.	<b>Colombia</b>
<b>Table 2. Physical requirements for whole/crushed/rubbed and ground <del>oregano</del>oregano</b> <b>(Allowed tolerance for defects)</b>	<b>India</b> Rationale: To make the title of the Table consistent with that of the approved standards under CCSCH (Cumin, Thyme). (Paragraph 15, REP CCSCH3)
<del>Cuadro Table 2. Physical requirements for whole/crushed/rubbed (entero/picado/frotado</del> <del>entero/picado/triturado) and ground oregano</del>	<b>Colombia</b>
Extraneous vegetable matter (*) (maximum % mass fraction) Class /Grade I: <u>1</u> Class/Grade II: <u>2</u>	<b>India</b>
Extraneous vegetable matter (*) (maximum % mass fraction) Extra: <u>1</u> Class /Grade I: <u>1</u> Class/Grade II: <u>5</u>	<b>Kenya</b>
Extraneous vegetable matter (*) (maximum % mass fraction) Extra: <u>0.5</u> Class /Grade I: <u>0.5</u> Class/Grade II: <u>0.5</u>	<b>Mexico</b>
Extraneous vegetable matter (*) (maximum % mass fraction) Extra: <u>1</u> Class /Grade I: <u>1</u> Class/Grade II: <u>1</u>	<b>USA</b>
Oregano powder (smaller than 40 mesh/420 µm maximum %)	<b>USA</b> This should be added at the bottom of Table 2 * Particle size is evaluated only upon request accompanied by supporting documents: Whole dead insects are measured based on a count/units per 100 gm and not by mass. Insect fragments are measured by a number of pieces/fragments per 10gm and not by mass
Oregano powder smaller than the particle size indicated. <del>*(smaller than 40 mesh/420 µm maximum %)</del>	<b>USA</b>

Oregano powder (smaller than 40 mesh/420 µm maximum %)	<b>Colombia</b> Clarify in granulometry if % of retention is according to No.of mesh Ground oregano should apply the same parameters as whole or crushed. Clarify in granulometry if % is of retention
Oregano powder (smaller than 40 mesh/420 µm maximum %) Extra: <b>20</b> Class /Grade I: <b>20</b> Ground Oregano: <b>80</b>	<b>USA</b>
Dead insects, insects fragments, maximum % mass fraction <del>fraction number/100 gm</del>	<b>USA</b> Add rows for insect fragments (number/ 10gm) 300 for whole, crushed/rubbed oregano and 1250 for powdered oregano. Rodent hair (number /10gm), 2 for or whole, crushed/rubbed oregano and 5 for powdered oregano mold damage 5w/w 5 (total with insect damaged) or whole, crushed/rubbed oregano and NA for powdered oregano and other excreta mg/Kg max 22 for whole, crushed/rubbed oregano and NA for powdered oregano
Dead insects, insects fragments, maximum % mass fraction	<b>Japan</b> Compared to the proposed foreign matter limit of 0.1%, we consider that proposed limit of 'Dead insects, Insects fragments' is too high. From a hygiene point of view, it should be as stringent as 0.1% or less.
Dead insects, insects fragments, maximum % mass fraction	<b>Colombia</b> No percentage of insect fragments should be allowed in any oregano species of any origin.
Dead insects, insects fragments, maximum % mass fraction Extra: <b>Null or 0</b> Class /Grade I: <b>Null or 0</b> Class/Grade II: <b>Null or 0</b>	<b>Colombia</b>
Dead insects, insects fragments, maximum % mass fraction Extra: <b>1</b> Class /Grade I: <b>1</b> Class/Grade II: <b>1</b>	<b>India</b> Rationale: Dead insects, insects fragments, should not be more than 1 % in all classes. 1% is also given in approved Standard for Thyme under CCSCH.
Dead insects, insects fragments, maximum % mass fraction Extra: <b>1</b> Class /Grade I: <b>1</b> Class/Grade II: <b>1</b>	<b>Mexico</b>
Dead insects, insects fragments, maximum % mass fraction Extra: <b>3</b> Class /Grade I: <b>3</b> Class/Grade II: <b>3</b>	<b>USA</b>
Live insects	<b>India</b> Unit for this parameter is missing. It should either be given a number or a footnote may be given as:

	"the product must be free from live insects".
Mammalian excreta maximum (mg/Kg)	<b>Colombia</b> No percentage of mammalian excreta should be allowed in any oregano species of any origin.
Mammalian excreta maximum (mg/Kg)	<b>Japan</b> Oregano belongs to the same family with thyme, and both oregano and thyme are produced similarly. Therefore, the limit of mammalian excreta should be, regardless of its grades, the same as thyme for consistency, such as 1.0 mg/kg w/w.
Mammalian excreta maximum (mg/Kg) Extra: <b>Null</b> Class /Grade I: <b>Null</b> Class/Grade II: <b>Null</b> Ground Oregano: <b>Null</b>	<b>Colombia</b>
Mammalian excreta maximum (mg/Kg) Ground Oregano: <b>1</b>	<b>India</b> Rationale: The maximum permissible limit shall not exceed 1 mg/Kg. This value has been accepted for approved standards for Thyme and Cumin.
Mammalian excreta maximum (mg/Kg) Extra: <b>1</b> Class /Grade I: <b>1</b> Class/Grade II: <b>1</b> Ground Oregano: <b>1</b>	<b>Mexico</b>
<b>3.2.5 Chemical Characteristics</b>	<b>USA</b> The chemical requirement values must be based on scientific study and trade acceptances. The U.S. reviewed the guidelines from the American Spice Trade Association (ASTA), the International Organization for Standardization (ISO) and the U.S. Food and Drug Administrations (FDA) regulations and submits the following amended table.
Whole/crushed/rubbed ( <del>entero/picado/frotado</del> <del>entero/picado/triturado</del> ) oregano and ground oregano shall comply with the chemical requirements specified in Table 3.	<b>Colombia</b>
Table 3. <del>Cuadro 3</del> . Chemical requirements for whole/crushed/rubbed ( <del>entero/picado/frotado</del> <del>entero/picado/triturado</del> ) oregano and ground oregano	<b>Colombia</b>
Parameter <u>Add another row for Moisture, % mass fraction, maximum. The value is 12 for Whole/Crushed/Rubbed oregano and 12 for Ground oregano.</u>	<b>USA</b> Add the values from 3.2.1 in the table.
Total ash, % mas fraction (dry basis), maximum Extra: <b>10</b> Class/Grade II: <b>10</b>	<b>USA</b>



Ground Oregano: <u>12</u>	
Total ash, % mas fraction (dry basis), maximum Class/Grade II: <u>10</u> Ground Oregano: <u>10</u>	<b>Mexico</b> According to the table 3, it's requested to establish the values. Based in European Spice Association European Spice Association (2011), Documentos minimos de calidad, Rev. 4,p.p 4 Link: <a href="http://www.fao.org/tempref/codex/Meetings/CCSCH/CCSCH1/sc01_03s.pdf">http://www.fao.org/tempref/codex/Meetings/CCSCH/CCSCH1/sc01_03s.pdf</a>
Total ash, % mas fraction (dry basis), maximum Ground Oregano: <u>12</u>	<b>India</b>
Total ash, % mas fraction (dry basis), maximum Ground Oregano: <u>12</u>	<b>Kenya</b>
Total ash, % mas fraction (dry basis), maximum Ground Oregano: <u>16</u>	<b>Colombia</b>
Acid-insoluble ash, %mass fraction (dry basis), maximum Ground Oregano: <u>1.5</u>	<b>Colombia</b>
Acid-insoluble ash, %mass fraction (dry basis), maximum Extra: <u>2</u> Ground Oregano: <u>2</u>	<b>USA</b>
Acid-insoluble ash, %mass fraction (dry basis), maximum Ground Oregano: <u>2</u>	<b>India</b> To align with the ISO Standard
Volatile oils (*), ml/100 g (dry basis), minimum Class /Grade I: <u>1.7</u> Class/Grade II: <u>1.5</u>	<b>Kenya</b>
Volatile oils (*), ml/100 g (dry basis), minimum Class/Grade II: <u>1.5</u>	<b>Mexico</b> 1.5 According to the table 3, it's requested to establish the values. Based in European Spice Association European Spice Association (2011), Documentos minimos de calidad, Rev. 4,p.p 4 Link: <a href="http://www.fao.org/tempref/codex/Meetings/CCSCH/CCSCH1/sc01_03s.pdf">http://www.fao.org/tempref/codex/Meetings/CCSCH/CCSCH1/sc01_03s.pdf</a>
Volatile oils (*), ml/100 g (dry basis), minimum Extra: <u>1.8</u> Class /Grade I: <u>1.8</u> Class/Grade II: <u>1.8</u>	<b>USA</b>
<b>3.4 Lot Acceptance</b>	<b>Colombia</b>
A lot should be considered as meeting the applicable quality requirements referred to in Section 3.2 when the number of "defectives", as defined in Section 3.3, does not exceed the acceptance number of the appropriate sampling plan. For factors evaluated on a sample average, <del>a lot</del> the lot will be considered acceptable if: the average complies with the	<b>Colombia</b> It is considered that for the acceptance of factors evaluated in average sample, the expression "excessively out of tolerance" is subjective and does not give clarity for the acceptance of lots. In view of this situation, Colombia recommends that a standard deviation outside the tolerance be allowed to accept the lot; or otherwise the term "excessively out of tolerance" be defined.

specified tolerance and no individual sample is excessively is found outside the tolerance mean +/- a standard deviation.	
<b>4 FOOD ADDITIVES</b>	
<b>4 FOOD ADDITIVES</b>	<b>USA</b> There is no uniform requirement or practice for the use of food additives in this product. Some countries prohibit their use while others do not. The use of food additives is largely dependent on its functional use, and market preferences. In this regard the U.S. recommends making this section optional by utilizing some of the text from the same section of the Codex General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005).
<del>No food additives, flavorings and processing aids are permitted in the products covered by this standard. Only the food additives listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) may be used in this product.</del> The additives allowed in the products covered (abarcado) by this standard are those indicated for this category of foods in the present standard General Standard for Food Additives (CODEX STAN 192-1995).	<b>Colombia</b> Colombia considers that according to the procedures established by the Codex Alimentarius Commission, the use of additives must comply with the provisions of CODEX STAN 192-1995, in order not to create inconsistencies between the standards.  In the General Standard for Food Additives (CODEX STAN 192-1995), additives are allowed such as: acesulfame potassium (flavour enhancer), butylhydroxytoluene (antioxidant), polysorbates (stabilizers), among others, which are authorized for the category "12.2.1 Aromatic herbs and spices".
<del>No food additives, flavorings and processing aids are permitted in the products covered by this standard. Only the food additives listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) may be used in this product.</del>	<b>USA</b>
<b>5</b>	
<b>5 CONTAMINANTS CONTAMINANTS</b> The control of contamination by mycotoxins should be considered. There are international (European) regulations where the preparation of the samples and the methods of analysis for the official control of the content of mycotoxins in food products, including spices, will meet the following criteria: Weight of the sample, method of sampling according to the lot weight and acceptance criteria.	<b>Colombia</b>
<b>6 FOOD HYGIENE</b>	
<u>add</u> <b>6.23</b> The products shall comply with any with microbiological criteria established in accordance with the ICMSF (microorganisms in food 2 sampling for microbiological analysis : principles and specific applications) book . <b>8- LABELLING</b> <u>Add</u> 8.4 shelf life for final products and production date for Non-Retail products  <del>Principles for the Establishment and Application of Microbiological Criteria for Foods (CXG 21-1997).</del>	<b>Iraq</b>

<b>8 LABELLING</b>	
<b>8 LABELLING</b>	<p><b>European Union</b> Section 8 – Labelling The EUMS support the mandatory indication of the species in the labeling of the products (para 8.2.2). Given that taxonomically different plants could be traded as "oregano", the EUMS consider that this provision is appropriate since it allows consumers to make informed choices and protects them from being misled.</p>
<p><b>8.1</b> The products covered by the provisions of this Standard shall <del>may</del> be labelled in accordance with the <i>General Standard for the Labelling of Pre-packaged Foods</i> (CXS 1-1985). In addition, the following specific provisions apply:</p>	<p><b>Mexico</b> To maintain agreement with the standards issued by the committee. (thyme)</p>
<p><b>8.2.3</b> Country of harvest/origin <b>8.4</b> Commercial identification -Class (grade)</p>	<p><b>India</b> Rationale: To align with the Codex Standard for Black, White and Green Pepper.</p>
<del><b>8.2.38.3</b></del> Country of harvest/origin	<b>India</b>
<del><b>8.2.48.5</b></del> Inspection mark (Optional)	<b>India</b>
<del><b>8.36</b></del> Labelling of Non-Retail Containers	<b>India</b>
<b>8.3 Labeling of Non-Retail Containers</b>	<p><b>Colombia</b> There are international regulations in which the safety and quality of packages and packaging for this class of products is required, which must be harmonized for free trade.</p>
<b>9. METHODS OF ANALYSIS AND SAMPLING</b>	
<p><b>9. METHODS OF ANALYSIS AND SAMPLING</b> <u>The U.S. poses adding the following to table 4</u> <u>Analyze whole insects, insect fragments rodent hair, by the AOAC 975.49 method and the principle of the method is, "extraction and visual examination"</u></p>	<p><b>USA</b> The U.S. realizes that all countries and traders do not possess or utilize identical levels of technology for in method of analysis. Hence, it is prudent to provide as many different recognized Methods of Analysis as possible in the standard.</p>
<b>9. METHODS OF ANALYSIS AND SAMPLING</b>	<p><b>European Union</b> Section 9 - Methods of analysis and sampling In relation to section 0.2 Sampling plan, the reference to the sampling plan for thyme and cumin does not seem to be appropriate since such plan has not been endorsed so far by CCMAS (par. 2 of REP 17/MAS). The issue of the development of specific sampling plans for spices and culinary herbs will be further discussed in CCSCH4. Thus, until any decision is taken on this issue, a reference to CAC/GL 50-2004 General Guidelines on Sampling could be considered.</p>
<p>Materia extranjera <u>extraña</u> <del>Foreign</del> Extraneous Matter</p>	<p><b>Colombia</b>  The parameter is better known as " Extraneous Matter" not as "Foreign Matter" In extraneous matter include the AOAC method 960.51. Determination of ashes Determination % moisture</p>

<p>ISO 927:<del>2009</del>2009 ISO 3632-2 ASTA 14 AOAC 960.51 AOAC 941.12 Gravimetry AOAC 986.21 Distillation</p>	<p><b>Colombia</b></p> <p>The parameter is better known as " Extraneous Matter" not as "Foreign Matter"</p> <p>In extraneous matter include the AOAC method 960.51.</p> <p>Determination of ashes</p> <p>Determination % moisture</p>
<p>Whole <u>live/</u> dead insect</p>	<p><b>India</b></p> <p>Rationale: Live insects is mentioned as a parameter under Table 2, therefore a method in this table should be given.</p>