

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 3.1

CX/SCH 22/6/3 Add.1

**JOINT FAO/WHO FOOD STANDARDS PROGRAM**  
**CODEX COMMITTEE ON SPICES AND CULINARY HERBS**  
**Sixth Session**  
**Virtual**

**26-30 September and 3 October 2022**

**DRAFT STANDARD FOR DRIED SAFFRON**  
**Comments in reply to CL 2022/25/OCS-SCH**

*Comments of Canada, Colombia, Cuba, Egypt, India, Peru, Philippines, Saudi Arabia, Uganda, USA and IOSTA*

## **Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/25/OCS-SCH issued in June 2022. 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 **Annex I** and are presented in table format.

**Annex I****GENERAL COMMENTS**

COMMENT	MEMBER / OBSERVER
Cuba is grateful for the opportunity to submit its comments with respect to CL 2022/25/OCS-SCH on the draft standard for Dried Saffron and in principle, we support the document at step 7.	Cuba
India supports the Draft Standard for Saffron.	India
Peru does not have any comments, thank you.	Peru
The Philippines supports the adoption of the text of the proposed draft's scope, description, essential composition and quality factors, food additives, contaminants, hygiene, weights and measures, labelling, and the method of analysis and sampling.	Philippines
<p>The United States of America submits the following comments in support of the activities of the Codex Committee on Spices and Culinary Herbs proposed draft standards for Dried Saffron.</p> <p>The CCSCCH must realize that the relevance of its work is not solely based on the standards being technically correct, but also the timeliness of the standards to stakeholders. Codex standards must reflect international trade practices, therefore, the inclusion of unwarranted provisions and those that cannot be verified must be avoided. For such inclusions reduce acceptance and application of the standard along with raising concerns about the of Codex and its activities.</p>	USA
<b>2. DESCRIPTION</b>	
<p><b>2.1 Product Definition</b></p> <p>Issue and Rationale: This section introduces the word “filaments”; however, the word is absent from the preceding Section 2.1- Product Definition that defines the product. The word is defined in the succeeding paragraph. Hence the reader must read the four different styles two which include “filaments” before an explanation is given.</p> <p><b>2.2 Styles</b></p> <p>Issue and Rationale: This section introduces the word “filaments”; however, the word is absent from the preceding Section 2.1- Product Definition that defines the product. The word is defined in the succeeding paragraph. Hence the reader must read the four different styles two which include “filaments” before an explanation is given.</p> <p>Proposal: The U.S. recommends the following revised text for Section 2.1 and 2.2</p> <p>Introduce the word “filaments” at a relevant location within the text of Section 2.1 and rewrite Section 2.2 to include description of the styles next to each style. With this change the paragraph with the style descriptions can be deleted. The U.S. proposal is as follows:</p> <p><del>Filaments</del> <u>Filaments - dried stigmas with a part of style</u></p> <p><del>Cut filaments</del> <u>filaments - dried stigmas with styles removed and completely detached from each other</u></p> <p><del>Powdered</del> <u>- particles obtained by crushing filaments</u></p>	USA
<p>Powdered</p> <p>We recommend that the "powdered" style is updated to "Powdered/crushed" with the definition as follows: "Particles obtained by crushing or grinding the whole filaments or cut filaments"</p>	IOSTA
<b>3. ESSENTIAL COMPOSITION AND QUALITY FACTORS</b>	
Extra Class; We suggest removal of ‘extra class’. Rationale in comments on table 1.	Canada
<p><b>3.2.3 Classification</b> Saudi Arabia suggests considering classifications and chemical and physical characteristics as mentioned within the ISO 3632-1:2011 SPICES — SAFFRON (CROCUS SATIVUS L.) — PART 1: SPECIFICATION standard.</p>	Saudi Arabia

COMMENT	MEMBER / OBSERVER
<p><b>3.2.3 Classification Issue and Rationale:</b></p> <p>The inclusion of Extra Class in this standard does not have a basis or foundation in international trade, additionally, it is not found in any of the standards being applied in trade. Introducing a higher class than what is existing in global trade will be disruptive to the sector along with lower prices for Class I because this class will no longer viewed as the top quality.</p> <p>Based on discussions at CCSC5 and subsequent electronic working groups, the United States is very concerned that the parameters on which the proposed Extra Class is based: Picrocrocin (taste), Safranal (aroma) and Crocin (colour) appears to be is discriminatory. These minimum parameters can be attained by only a few countries. Therefore, in such a case, the standard is used to gain market advantages rather than to facilitate trade. Furthermore, the current ISO standard for Saffron (2011) list only three classes (I, II,III) and does not mention extra class. The United States is also concerned that if we add an extra class, it will not align with the ISO standards.</p> <p>Proposal: The United States recommends deleting/omitting Extra Class from the standard.</p>	USA
<b>6. HYGIENE</b>	
<p><b>6.1</b> It is recommended that the products covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the <i>General Principles of Food Hygiene</i> (CXC 1-1969), <i>Code of Hygienic Practice for low moisture foods</i> (CXC 75-2015), <b>Annex III, and other relevant Codex texts such as codes of hygienic practice and codes of practice.</b></p> <p>Uganda recommends that the statement “...Annex III Spices and dried culinary herbs and other relevant Codex texts...” is put in brackets</p> <p>JUSTIFICATION</p> <p>it was creating the impression that there was an Annex III attached which was on “Spices and dried culinary herbs and other relevant Codex texts”</p> <p>PROPOSED CHANGES</p> <p>The proposed changes to read as “ .... CXC 75-2015, Annex III Spices and dried culinary herbs and other relevant Codex texts)”.</p>	Uganda
<b>8. LABELLING</b>	
<p>8.3.2 Country of <del>harvest</del>harvest (optional)</p> <p>Country of harvest should be optional. This is in line with REP21/SCH (paragraph 19). This would also be in alignment with other standards adopted by CCSC and the advice from CCFL in the General Standard for the Labelling of Prepackaged Food (GSLPF).</p>	Canada
<p>8.3.3 Region of harvest and Year of harvest (mandatory)</p> <p>Making Region of Harvest mandatory creates a conflict with Canadian requirements. We suggest reverting to region of harvest declaration being optional.</p>	Canada
<p><del>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.</del>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).[SR1]</p> <p>This section is still using the old text. Should be updated to align with text used in other draft spice standards: 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).</p>	Canada
<p>8.3.2 Country of harvest</p>	Egypt

COMMENT	MEMBER / OBSERVER
Deleting this item because it repeated in section 8.3.2	
<p>8.3.3 Region of harvest and Year of harvest (<del>mandatory</del>)(optional)-</p> <p>Rationale: This seems to be a typographical error. This issue was discussed in the previous plenary session that the requirement 'Year of harvest' is to be considered as optional provision.</p>	India
<p><del>Information for</del> "The labelling of non-retail containers shall should be given either on the container or in accompanying documents, except that accordance with the name of General Standard for the product, lot identification, and the name and address Labelling of the manufacturer, country Non-Retail Containers 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 Foods (CXS 346-2021)."</p> <p>Rationale: The revised provision for Non-Retail Containers (NRC) is as per the latest guidelines on NRC and consequential amendment in codex procedural manual which was approved in CAC44.</p>	India
<p>8.2.2 Uganda Recommends using "shall" in place of "may" in the statement "The name of the product may include an indication....".</p> <p>The justification is that "the different styles are distinct and might affect trade</p> <p>PROPOSED CHANGES</p> <p>The proposed changes to read, as "....The name of the product shall include an indication ....."</p> <p><b>8.5 Labelling of non-retail Containers</b></p> <p>Uganda recommends that the "labelling of non-retail containers clause " is made uniform like in the previous draft standards which give reference to the standard on non-retail containers and not the statement.</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, 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"</p> <p>PROPOSED CHANGES</p> <p>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)..."</p>	Uganda
<p><b>8.3 Country of Origin and Country of Harvest</b></p> <p>Issue and Rationale: The requirement that Country of Harvest shall be declared is contrary to the most recent decisions of the forty-fifth Session of Codex Committee on Food Labeling (CCFL45) which was discussed at CCSCH5. While it is understandable that some countries want to protect the unique status of their SCH, it is not fair and respectful to the CCSCH and for these to raise issues that were previously settled by the CCSCH and other Codex scientific committees.</p> <p>U.S. Proposal:</p> <p>The United States recommends CCSCH6 to adhere its decision taken at CCSCH5 (REP 21/SCH, para 19) based on advice of the CCFL 45 (REP21/FL para 40) that:</p> <ul style="list-style-type: none"> <li>- Country of origin is mandatory</li> <li>- Country of Harvest and region of harvest as optional</li> </ul>	USA

COMMENT	MEMBER / OBSERVER
8.3.2 We recommend that "country of harvest" is defined or a reference is cited that defines "country of harvest" versus "country of origin" for additional clarification. While country of harvest is not commonly used for labeling, we do support its use as it can be used to combat provenance fraud.	IOSTA
<b>TABLE 1</b>	
Canada proposes that "Extra Class" be removed from this Standard. Canada agrees that the 'colouring strength for Crocin' in Table 1 of the draft standard be consistent with the ISO standard, which is 200 (minimum) for Class I.	Canada
<p><u>Crocin</u> It is proposed that the classification parameters in the ISO standard 3632 on coloring strength (crocin) for the categories I (200), II (170) y III (120) be taken into account.</p> <p>Based on the data from the same standard ISO 3632, it is established that a value above 257 can result in a bitter flavour. Therefore, it is necessary to review the commercial aspect for Saffron extra class with a value of 260.</p>	Colombia
<p>India proposes to remove parameter "Artificial colorants" from table.</p> <p>Rationale: No values mentioned for the parameter in the table rather it is a general provision and the same has already been addressed in the section of Food Additives.</p> <p>India proposes value of 1.5% w/w (max) for Acid Insoluble Ash on dry basis in Saffron (Class/Grade-III).</p> <p>Rationale: India proposes value '1.5' based on the availability of trade data and European Spice Association Quality Minima Document (Rev. 5). Further, the requirement "Max." to be mentioned for the parameter.</p> <p>India proposes value of Min 30 for Safranal (Aroma Strength) in Saffron (Class/Grade-Extra Class).</p> <p>Rationale: The aroma strength is main component in saffron which impart flavour and so as to distinguish from the other classes it should have increased aroma strength of Min 30 and Max 50 compared to other classes otherwise keeping Extra Class is redundant.</p>	India
<b>TABLE 2</b>	
<p>It is proposed that the following forms be included in the physical characteristics:</p> <p>a) strands (whole filaments and cut filaments);</p> <p>b) powdered (ground)</p> <p>In accordance with the ISO Standard 3632, which establishes the specifications for dried saffron obtained from the pistils of the <i>Crocus sativus</i> L flower.</p>	Colombia
<p>India proposes value of 0.25% w/w (max) for Extraneous Matter in Saffron Filament and Cut Filament (Extra Class).</p> <p>Rationale: Based on availability of trade data.</p>	India
NA should be amended to N/A. Per Annex II, Table 2 (point 13), the EWG discussed the replacement of "NA" with "N/A".	IOSTA