

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5.2

CX/SCH 22/6/6 Add.1

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

Sixth Session

Virtual

26-30 September and 3 October 2022

PROPOSED DRAFT STANDARD FOR SMALL CARDAMOM

Comments in reply to CL 2022/28/OCS-SCH

Comments of Canada, Cuba, Egypt, European Union, Guatemala, India, Philippines, Saudi Arabia, Syrian Arab Republic, Uganda, United Kingdom, USA, Venezuela (Bolivarian Republic of) and IOSTA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/28/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 observations on the Circular Letter CL 2022/28/OCS-SCH of the proposed draft standard for small cardamom. We support this document, as small cardamom is not produced in Cuba. It is a product that is imported and the quality specifications in the standards established by CODEX are accepted. Having analyzed the report of the previous Codex Committee meeting, we are in agreement with the three recommendations proposed.	Cuba
Guatemala requests for inclusion of the open capsule presentation and its characteristics in the proposed draft standard.	Guatemala
India supports the Proposed Draft Standard for Small Cardamom.	India
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 method of analysis and sampling. However, we are proposing minor revision to section 9.2 Sampling Plan.	Philippines
We generally accept the proposed document	Syrian Arab Republic

2. DESCRIPTION

Table 1. Common and scientific name of dried small cardamom It is suggested to delete Table 1 , merging it in the definition item 2.1 and adding family name of plant. It is to be as follows: Dried Small Cardamom is a product obtained from the dried fruits of <i>Elettaria cardamomum</i> L. Maton , Matonof the (Zingiberaceae) family.	Egypt
2.1 Product definition Saudi Arabia suggests a comprehensive definition for small cardamom. Therefore, a better understanding for small cardamom can be reached.	Saudi Arabia
<i>Elettaria cardamomum</i> L. (L.) Maton Addition of brackets	United Kingdom
2.1 Product definition Issue and Rationale: Because the draft standard only covers small cardamon, it is prudent to have a maximum size/dimension. This is very important to differentiate between the two sizes and/or types of cardamom in trade. i.e., Small /green cardamom and Large/Black cardamom. Proposal: The United States recommend including the maximum size/dimension as a second sentence in section 2.1 Product Definition as follows: 2.1 Product definition Dried Small Cardamom is a product obtained from the dried fruits of the plant as described in Table 1, having a maximum length ofmm measured from the pedicel to the blossom end of the pod/capsule. Or Insert "Green Cardamom" in brackets next to Small Cardamon in the Common name column of Table 1.	USA
Table 1 <i>Elettaria cardamomum</i> L. Maton <i>Elettaria cardamomum</i> (L.) Maton is the proper annotation.	IOSTA

2.2 Styles

Dried small cardamom may be: It is suggested to add "powdered whole pods / capsules " to the styles of small cardamom because this is style available in trade markets.	Egypt
2.2 Styles	European Union

We support the requirement that small cardamom powder is obtained (exclusively) from seeds and not from whole pods (capsules included). Verification is carried out by microscopic analysis and this makes it possible to clearly distinguish the cells of the seeds from those of the capsules thus allowing the detection of non-compliance.	
Whole (unopened pods/capsules) Guatemala requests for addition of the open capsule presentation and its characteristics in tables 2 and 3	Guatemala

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.2.3 Classification (optional) Saudi Arabia suggests providing a classification for cardamom that includes the size, colour, and defects.	Saudi Arabia
3.2.1 Odour, flavour and color: Uganda recommends For consistency in spelling of the word “color” ver “colour	Uganda

4. FOOD ADDITIVES

4.1 The anticaking agents listed in Table 3 of the <i>General Standard for Food Additives</i> (CXS192-1995) may be permitted for use in ground/powdered small cardamom. We recommend that the following sentence be added: "Any permitted additives that are used should be declared."	IOSTA
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5. CONTAMINANTS

5.1 The products covered by this Standard shall comply with the maximum levels of the <i>General Standard for Contaminants and Toxins in Food and Feed</i> (CXS 193-1995) and any other relevant Codex texts. Noting some inconsistency with respect to other standards which read: The products covered by this Standard shall comply with the maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995), {Code of Practice for the Prevention and Reduction of Mycotoxins in Spices (CXC 78 - 2017)} and other relevant Codex texts. The text between { } is missing here.	Canada
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6. HYGIENE

6.1 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) the <i>Code of Hygienic Practice for low moisture foods</i> (CXC 75-2015) Annex III Spices and Aromatic-Dried Culinary Herbs and other relevant Codex texts. Suggested edit for consistency with other draft standards.	Canada
6.1 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) the <i>Code of Hygienic Practice for low moisture foods</i> (CXC 75-2015) Annex III Spices and Aromatic Herbs and other relevant Codex texts. Uganda recommends that the statement “...Annex III Spices and dried culinary herbs and other relevant Codex texts...” is put in brackets JUSTIFICATION Because 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”. PROPOSED CHANGES The proposed changes to read as “ CXC 75-2015, Annex III Spices and dried culinary herbs and other relevant Codex texts”.	Uganda

8. LABELLING

<p>8.4 Labelling of Non-Retail Containers</p> <p>There is some inconsistency- In some draft standards such as 'nutmeg', 'chilli peppers and paprika', and 'saffron'- 8.4 is Commercial Identification section and Labelling of non-retail containers is 8.5.</p>	Canada
<p>8.2.2 The name of the product may include an indication of the style as described in Section 2.2.</p> <p>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>	Uganda

9 METHODS OF ANALYSIS AND SAMPLING

<p>9.2 SAMPLING PLAN</p> <p>The Philippines proposes that the sampling plan should be included to the draft standard.</p> <p>Reason:</p> <p>This will establish the guideline of the sampling of small cardamom for inspection.</p>	Philippines
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Table 2. Chemical Characteristics for Dried Small Cardamom

<p><u>Whole</u> Acid-insoluble ash 2</p> <p><u>Powdered</u> volatile oil 3</p>	Egypt
<p>Add the note "on dry basis" in the table header of total ash, acid insoluble ash and volatile oil.</p> <p>Rationale: In table 4 Method of analysis these parameters are presented on dry basis.</p> <p>In ISO 882-1:1993 Cardamom [Elettaria cardamomum (Linnaeus) Maton var. minuscula Burkill] - Specification - Part 1: Whole capsules and in ISO 882-2:1993 Cardamom [Elettaria cardamomum (Linnaeus) Maton var. minuscula Burkill] - Specification - Part 2: Seeds - the unit is "on dry basis".</p>	European Union
<p>India proposes value of 9.5% w/w (max) for Total Ash in Small Cardamom (Seeds).</p> <p>Rationale: The reference document viz ISO 882-2 mentions the requirement of Total Ash for Cardamom (Seeds) as 9.5.</p> <p>India proposes value of 2.5% w/w (max) for Acid Insoluble Ash in Small Cardamom (Whole).</p> <p>Rationale: This is basis the European Spice Association Quality Minima Document (Rev. 5).</p> <p>India proposes value of 1% v/w (min.) for Volatile Oil in Small Cardamom (Powdered seeds).</p> <p>Rationale: India being the major exporter for cardamom, support value "1".</p>	India
<p>- For the acid insoluble ash % w/w (max) for seeds, we recommend a value of 2-3%.</p> <p>- We would like to note that there can technical challenges associated with a 3% volatile oil content for powdered seeds. A product with an oil content of 3% is too high to keep throughout the shelf life of the product, however 3% is feasible for untreated product. In contrast, powdered seeds treated with steam would require a lower volatile oil content such as 1%.</p> <p>- For whole cardamom, was there consideration for different grades (green, brown, etc.)?</p>	IOSTA

Table 3. Physical Characteristics for Dried Small Cardamom

<p><u>2nd column:</u> Product Name</p> <p>Delete "Product Name" and replace with "Style" in the table header.</p> <p><u>3rd column:</u> Empty and malformed capsules by count</p> <p>Delete "by count)" and replace with "count/100 g (max)" in the table header.</p>	European Union
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<p><u>8th column:</u> Whole insects dead (By count)</p> <p>Delete "(By count)" and replace with "count/100 g (max)" in the table header.</p> <p>Leave the value 4 (not N/A) for Seeds.</p> <p>Rationale:</p> <p>In ISO 882-1:1993 (whole capsules) and ISO 882-2:1993 (seeds) it is said that it "shall be free from live insects and shall be almost free from moulds, dead insects, insect fragments and rodent contamination..." so in our opinion we should determine the acceptable level also for seeds.</p> <p><u>9th column:</u> Excreta Mammalian (mg/kg)</p> <p>Add "(max)" at the end in the table header.</p> <p><u>10th column:</u> Excreta Others (mg/kg)</p> <p>Add "(max)" at the end in the table header.</p> <p><u>11th column:</u> Mold Visible % w/w</p> <p>Add "(max)" at the end in the table header.</p> <p>Leave the value 1 for Seeds.</p> <p>Rationale:</p> <p>In ISO 882-1:1993 (whole capsules) and ISO 882-2:1993 (seeds) it is said that it "shall be free from live insects and shall be almost free from moulds, dead insects, insect fragments and rodent contamination...". Therefore, the acceptable level should also be determined for seeds.</p> <p>New column</p> <p>We suggest to add a new parameter "live insects count/100 g: 0".</p> <p>Rationale:</p> <p>Such requirement is in other Codex standards, for example: CXS 345-2021, CXS 347-2019, CXS 344-2021 the value is always "0". In this draft standard we have the requirement only for dead insects.</p> <p>In ISO 882-1:1993 concerning the whole capsules of cardamom and in ISO 881-2:1993 concerning the seeds it is required that the cardamom "shall be free from live insects".</p>	
<p>India proposes NA for Whole insects, dead; Excreta Mammalian; Excreta Others and Mold Visible in Small Cardamom (Seeds).</p> <p>Rationale: As per discussions during previous sessions of CCSCCH, Not applicable (NA) means that this form of the above product has not been evaluated for this provision, and currently there are no values. N/A does not refer to zero.</p>	India
<p>It is proposed to modify the title to Table 3: Limits for extraneous matter established for small cardamom</p>	(Bolivarian Republic of) Venezuela

Table 4. Method of analysis¹

<p>There is no designated method for determination of "light seeds" or "whole insects, dead" and "whole insects, live" (if the last parameter is added).</p>	European Union
<p>- After the final adoption of the standard by the Commission, the above identified methods will be transferred to the standard for Recommended methods of testing and sampling (CXS 234-1999) and the text in the Procedural Manual will be inserted</p> <p>Rationale: It seems more of an instruction rather an explanation in footnote.</p>	India