

23 January 2024

CODEX COMMITTEE ON SPICES AND CULINARY HERBS

(Seventh Session)

Kochi, India, 29 January – 2 February 2024

European Union comments on

AGENDA ITEM 2 – QUESTIONS FROM CCMAS

**Matters arising from the Codex Alimentarius Commission
and its Subsidiary Bodies**

(CX/SCH 24/7/2 Rev.1)

*Mixed Competence
Member States Vote*

The EU and its Member States (EUMS) thank the Secretariat for the information on matters arising from Codex Alimentarius Commission and its subsidiary bodies. The EUMS would like to submit the following remarks and considerations.

42nd Session of the Codex Committee on Methods and Analyses and Sampling (CCMAS42) – Questions from CCMAS to CCSCH to assist in the endorsement of methods (Para 20 b. and Appendix of CX/SCH 24/7/2 Rev.1)

The EUMS would like to recall the previous recommendations of CCMAS40, that still apply (REP19/MAS):

13. CCMAS40 agreed that CCSCH should note:

- [...]
- *It was important to establish and utilize consistent provisions and terminology when possible.*
- [...]

14. *The Committee encouraged delegations to CCMAS to liaise with their counterparts to CCSCH on methods of analysis, India as the lead country on spices and culinary herbs in both Codex and ISO to better coordinate work on methods of analysis for these products, and that equally the Codex Secretariat should ensure that guidance is given to CCSCH on how to present methods of analysis for endorsement taking into account the guidance provided in the Procedural Manual.*

In addition, methods of analysis sent to CCMAS for endorsement should be checked against methods previously endorsed and enclosed in CXS 234-1999 to ensure consistency.

Regarding the terminology issues, the use of the template for SCH standards should also be encouraged as it could help significantly reducing such inconsistencies or errors.

The EUMS propose the following replies to the questions in the Appendix:

Questions from CCMAS to CCSCH to assist in the endorsement of methods¹³

Standard for dried roots, rhizomes, and bulbs – dried or dehydrated ginger (CXS 343-2021); the Standard for dried floral parts – cloves (CXS 344-2021) and Standard for dried basil (CXS 345-2021)

1. ISO 927 is identified as a Type I method for “whole dead insects”, but as a Type IV for ‘live insects’. Is there a reason for this difference in typing?

It is suggested to identify ISO 927 for both provisions as Type I.

2. MPM-V8 is listed as a Type IV for ‘mammalian/other excreta’, however ISO 927 appears to capture this category and is identified as a Type I at other parts of the table. Is there a reason for selecting a Type IV for this provision?

MPM-V8 method is suggested to be dropped.

Standard for dried floral parts – saffron

1. The taste strength, aroma strength, colouring strength provisions use the ISO 3632-2 and are listed as Type IV. As this ISO standard is specific to saffron, is there a reason it is listed as a Type IV and not a Type I?

ISO 3632-2 should be listed as Type I.

Standard for dried or dehydrated chilli pepper and paprika (CXS 353-2022)

1. For the provision ‘live insects’ there are two methods listed and both identified as Type I. Are these methods identical? If not, one must be endorsed as Type I method and the other removed.

ISO 927 should be kept. Only one can be the Type I method.

Draft Standard for dried small cardamom and draft Standard for spices derived from dried fruits and berries (Part A – allspice, juniper berry and star anise)

1. There are Type I and Type IV methods listed for the provisions “whole dead insects” and “insect fragments”. While listing both a Type I and Type IV is allowed, there should be a compelling reason for the listing. Would it be possible to explain the reasoning for this request?

ISO 927 should be kept.

2. There are parenthetical comments in the provision for ‘filth’ and ‘light filth’, which says list all the filth here – for example – mammalian excreta? It is unclear if this is text should have been removed.

Comparison between different CCSCH standards

1. In the *Standard for dried roots, rhizomes and bulbs – dried or dehydrated ginger* (CXS 343-2021) ISO 927 is a Type IV for ‘mammalian / other excreta’, but in the *Standard for dried seeds – nutmeg* (CXS 352-2022) ISO 927 is listed as a Type I for this same provision. Is there a reason for the different typing of the same method for the same provision?

ISO 927 as the Type I method is proposed for all the mentioned provisions.

2. In some standards the provision is listed as ‘mould visible’ and in others it is listed as ‘visible mould’, is there a significance to this difference or could a single name for the provision be used consistently across standards.

3. Across standards, there are some differences in provision groups. One example, in the draft Standard for dried small cardamom the provision is ‘whole insect live / dead’, while in the *Standard for dried roots, rhizomes and bulbs - dried or dehydrated ginger* (CXS 343-2021), the provisions are listed

separately as 'whole dead insects' and 'live insect'. Are these intentional?

Glossary of terms

Responding to a question whether there was a set of definitions/terminologies that could assist CCMAS when the methods are reviewed for endorsement, the Codex Secretariat clarified that CCSCCH had developed a glossary of terms for their internal use available in CX/SCH 17/3/10.

¹³ REP23/MAS paragraphs 23-25