

EU reply

CL 2023/81/OCS-SCH

Request for Comments on the Updated Template for Spices and Culinary Herbs (SCH) Standards

Member States Competence Member States Vote

The Member States of the European Union (MSEU) would like to thank the United States of America for updating the Template for Spices and Culinary Herbs (SCH).

The MSEU would like to submit the following comments:

2.3 Sizing (optional)

The provision "When sized, the methods used should be labelled on the package" requires additional clarification. It is not clear whether this is an explicit requirement for the producer to put such information on the packaging. For example, if a producer labels its product "vanilla pods that it is 15 cm length and above", is it necessary to indicate on the package how it was determined?

3.2 Quality criteria

It should be considered which term to use: "Quality criteria" or "Quality factors". In existing Codex standards (amended in 2022), e.g. standard for dried basil (CXS 345-2021) or standard for dried oregano (CXS 342-2021), this point is named "Quality factors". Furthermore, in the heading of that paragraph (point 3) of this template and of the above-mentioned standards the term "ESSENTIAL COMPOSITION AND QUALITY FACTORS" is used. Therefore, the MSEU suggest to use the same terms and follow a consistent approach. Having regard to the above, in point 3.2 it should be consequently "quality factors" and not "quality criteria".

4. Food Additives

The MSEU would suggest to include the option of prohibition, in order to emphasise that other standard may not permit the use of food additives (e.g. draft saffron standard) and modify the provision accordingly:

"Anticaking agents listed in Table 3 of the *General Standard for Food Additives* (CXS 192-1995) are acceptable for use in ground/powdered form of {SCH group name} or no food additives are permitted (as specified in other standards)".

8.1 Name of the product

The MSEU suggest to follow the same approach as in existing standards and in the draft standard for saffron, i.e. to divide the “Name of the product” in sub-points (in this case in 8.1.1, 8.1.2 and 8.1.3).

Annex I - General comment:

Annex I - Table 1: Chemical characteristics

The MSEU consider that adding a note could clarify that the volatile oils values are related to natural spices, not to heat treated or subjected to other processes, that may reduce the natural content of volatile oil (this note should be included in all the standards as a generic remark).

Furthermore, the MSEU propose to move the terms “(max)” or “(min)” always at the end of the name of the parameters. The term “(max)” should be added at the end of the “non-volatile ether extract” column.

Annex I - Table 2: Physical characteristics

It is not clear why the different physical characteristics listed in this table differ from other existing and draft standards.

It would be worth considering adding definitions of terms extraneous matter and foreign matter, which would be the same for all spices and herbs. A good example is the standard for oregano: “Extraneous matter - vegetative matter associated with the plant from which the product originates but not accepted as part of the final product, such as stems/sticks, etc.”; “Foreign matter – any visible/detectable objectionable foreign matter or material not usually associated with the natural components of the spice plant, such as stones, burlap bagging, metal, foreign leaves, etc.”