

European Union comments
CODEX COMMITTEE ON SPICES AND CULINARY HERBS
Codex Circular Letter CL 2018/54/OCS-CCSCH:
"Proposed draft standard for dried oregano"

Mixed Competence.
Member States Vote.

The European Union and its Member States (EUMS) would like to submit the following comments:

1. General comments

The EUMS appreciate the work done in the eWG and 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.

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.

2. Specific comments

2.1 Section 2 – Description

- 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.
- 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:
 1. Oikea oregano: this name appears in Mansfeld's database as the common name for *Origanum onites* L.. However, no other scientific sources can be found to substantiate this common name.

2. *Origanum x majoricum* Cambess is a hybrid of *O. majorana* L. x *O. vulgare* L. ssp *virens*, which is linked to "Italian oregano" in Mansfeld's database. It seems that CCSCH2 decided to exclude *Oregano majoranum* from the draft standard for oregano. We wonder whether *Oregano majoranum* should be included in Table 1.
3. According to the Euro+Med plant database¹, *Origanum vulgare* subsp. *virens* grows on the Iberian peninsula and Marocco². Thus we wonder whether a different common name should be used for it.

In addition, the EUMS consider that in Table 1, should read as follows:

Turkish oregano (?)	<i>Origanum vulgare</i> subsp. <i>virens</i>
Greek oregano	<i>Origanum vulgare</i> subsp. <i>hirtum</i>

4. The full scientific name of *Origanum vulgare* subsp. *hirtum* is *Origanum vulgare* subsp. *hirtum* (Link) Ietsw¹.

2.2 Section 3 - Essential composition and quality factors

- 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).

2.3 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.

2.4 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. 22 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.

¹ <https://npgsweb.ars-grin.gov/gringlobal/taxonomydetail.aspx?id=430877>

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 502004). It was unclear whether the sampling plan provided were being applied to attributes or variable characteristics and requested CCSCH to reconsider the values in line with GL50. The Committee also agreed to 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.