## EU reply to CL 2022/28/OCS-SCH

## PROPOSED DRAFT STANDARD FOR SMALL CARDAMOM (at Step 3)

## Mixed Competence Member States Vote

POINT			COMMENTS
2.2 Styles			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.
Annex I Table 2. (	Chemical Ch	aracteristics	s for Dried Small Cardamom
Total Ash %w/w (max)	Acid Insoluble Ash %w/w (max)	Volatile oil %v/w (min.)	Add the note "on dry basis" in the table header of total ash, acid insoluble ash and volatile oil. <i>Rationale:</i> In table 4 Method of analysis these parameters are presented on dry basis. 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".
Annex I	Table 3. Ph	nysical Cha	racteristics for Dried Small Cardamom
2nd column: Product Name			Delete "Product Name" and replace with "Style" in the table header.
3rd colun capsules		nd malformed	Delete "by count)" and replace with "count/100 g (max)" in the table header.

POINT	COMMENTS
8 <sup>th</sup> column: Whole insects dead (By	Delete "(By count)" and replace with "count/100 g (max)" in the table header.
count)	Leave the value 4 (not N/A) for Seeds.
	Rationale: 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 <u>almost</u> free from moulds, dead insects, insect fragments and rodent contamination…" so in our opinion we should determine the acceptable level also for seeds.
9th column: Excreta Mammalian (mg/kg)	Add "(max)" at the end in the table header.
10th column: Excreta Others (mg/kg)	Add "(max)" at the end in the table header.
11th column: Mold Visible % w/w	Add "(max)" at the end in the table header.
	Leave the value 1 for Seeds.
	Rationale: 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.
New column	We suggest to add a new parameter "live insects count/100 g: 0".
	Rationale: Such requirement is in other Codex standards, for example: CXS 345-2021, CXS 347-2019, CXS 344-2021 the value is always "O". In this draft standard we have the requirement only for dead insects. 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".
Table 4. Method of analysis	There is no designated method for determination of "light seeds" or "whole insects, dead" and "whole insects, live" (if the last parameter is added).