

European Union reply to

CL 2023/2/OCS-SCH

REQUEST FOR COMMENTS, AT STEP 6/7, ON THE DRAFT STANDARD FOR DRIED SMALL CARDAMOM

**Mixed Competence
Member States Vote**

The European Union and its Member States (EUMS) would like to thank to the Electronic Working Group chaired by India and co-chaired by Guatemala and the Islamic republic of Iran for updating the draft **Standard for dried small cardamom**.

The EUMS would like to submit the following comments:

PARAGRAPH	COMMENTS
2.1 Product definition	It is suggested to use the following: “ Small Green cardamom”. The common and trade name of the spice is "Cardamom" or "Green Cardamom" - to make a difference with "Black Cardamom" (<i>Amomum</i> spp.) that is another spice, out of the scope of this standard.
2.2 Styles	The following amendments should be considered: <ul style="list-style-type: none"> - Seeds (seed obtained after opening of the pods/from the capsules); - Ground/powdered seeds (obtained by grinding and the seeds only, after separation from the capsules)
8.1	Editorial comment: The first sentence should be presented without indicating “8.1”: 8.1 “The products covered by the provisions of this Standard shall be labelled in accordance with the General Standard for the <i>Labelling of Prepackaged Foods</i> (CXS 1-1985).” This is a sentence that ends in colon and is followed by sub-bullet points, that need to be renumbered accordingly, i.e.: 8.1

	Name of product, 8.2 Country of origin, 8.3 Labelling (...).
8.3	The heading should be as follows: “Country of origin and country of harvest” instead of “Country of origin/country of harvest” – in accordance with the provisions of the “Template for SCH standard”. Having the slash could lead to confusion.
Annex I Table 1. Chemical characteristics	<p>We suggest the following changes:</p> <ul style="list-style-type: none"> - The values of “Total ash” column should be changed to 9.5% for all whole/powdered products and all values of “Acid insoluble ash” column to 3%. <p>Rationale: The values of total ash and acid insoluble ash should be the same in both whole and powdered forms, as grinding neither add nor remove mineral elements. The proposed value of total ash would be consistent with ISO 882 Standard (which gives such a value for whole capsules and seeds), and the proposed value of acid insoluble ash would be approximated to the European Spice Association (ESA) value - that is 2.5 % w/w max. on wet basis, taking into account a maximum acceptable moisture for this spice given in ISO 882 Standard i.e. 13 % w/w”.</p> <ul style="list-style-type: none"> - The proposed moisture and volatile oil values are consistent as grinding can lead to a drop in humidity and lower spice quality. - Volatile oil: it is suggested to have 2% for powdered capsules and powdered seeds. There is no need to mention a different value for steam treated seeds. - It might be considered adding a note saying that the volatile oil values are related to natural spice, not 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).
Table 2. Physical characteristics	<ul style="list-style-type: none"> - The last 5 columns related to light filth test should be removed and replaced by generic sentence: e.g., <u>Insects (live & dead) and mammalian excreta & hair, visible to the naked eye should aim to be zero.</u> - The values indicated are those proposed by ISO 882 for the lower cardamom grades in each category. This relates to the discussion on different grades. It is suggested to insert a footnote to indicate that these values relate to lower cardamom grade. - Including definitions as a footnote for the parameters: “Empty and malformed capsules”, “Immature and shrivelled capsules” and “Light seeds” should be considered. The ISO 882-1 and 882-2 definitions could be used:

	<ul style="list-style-type: none"> ○ Empty and malformed capsules: Capsules which have no seeds or are scantily filled with seeds. ○ Immature and shrivelled capsules: Capsules which are not fully developed”. ○ Light seeds include seeds that are brown or red in colour, and broken, immature and shrivelled seeds. [...]”. <p>- It should be considered to add a note clarifying “Insect defiled/infested” like in ISO 882-1: “<i>Thrip marks alone on cardamom capsules should not lead to the conclusion that the capsules have been infested with insects</i>”. This would be consistent with the ISO standard.</p>
<p>Table of method of analysis</p>	<p>- Regarding the parameter “empty and malformed capsules”, instead of IS 1907:1984, the ISO 882-1 should be followed, which says: “The proportion of empty and malformed capsules shall be not more than 5% by count”. This ISO standard is globally recognised, and its application seems appropriate. Furthermore, it would be also consistent with the physical characteristics described in table 2. Its third column (for “Empty and malformed capsules”) mentions “by count/100 capsules” and the limit provided is 5.</p>