

European Union reply to
CL 2023/03/OCS-SCH
DRAFT STANDARD FOR SPICES DERIVED FROM DRIED FRUITS AND BERRIES
PART A – REQUIREMENTS FOR ALLSPICE, JUNIPER BERRY AND STAR ANISE
(At Step 6/7)

Mixed Competence
Member States Vote

The European Union and its Member States (EUMS) would like to thank the United States of America, Madagascar, Mexico and India for revising the draft standard. The EUMS would like to submit the following comments:

POINT	COMMENTS
2.2 Styles	<p>It is proposed to divide 2.2. in the following two subpoints (similar to the basil standard):</p> <p>2.2.1. Dried fruits and berries may be:</p> <ul style="list-style-type: none"> - Whole - Cut/broken - Ground/powdered <p>Other styles distinctly different for those three are allowed, provided they are labeled accordingly.</p> <p>2.2.2 The particle size of ground/powdered style is determined by contractual agreement between buyer and seller.</p>
2.3 Sizing (optional)	<p>It should be modified as follows:</p> <p>“Dried fruits and berries may be sized whole, cut/<u>broken</u> or <u>ground/powdered</u> when appropriate in accordance with existing practices <u>and determined by contractual agreement between buyer and seller</u>. When sized, the size designation <u>and the method used</u> shall be indicated on the package”.</p>

	Remove the provision: "...and the method used shall be indicated on the package" as this raises doubts, and this requirement is unnecessary. It is more important for consumers to find information on the size designation and this requirement should be appropriately emphasized in the standard.
3.2 Quality criteria	For consistency with the template for SCH standards, with the heading of that paragraph (point 3) of this draft standard and with other standards, it is proposed to use "Quality factors" instead of "Quality criteria". In the "Template for SCH Standards", the term "ESSENTIAL COMPOSITION AND QUALITY FACTORS" is used. In addition, 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". Therefore, having regard to the above, in point 3.2 it should be consequently "quality factors" and not "quality criteria".
3.2.2. Classification (optional)	The following sentence should be modified: „When dried fruits and berries are traded as classified/graded, the provisions in Annex I shall apply as the minimum requirements for the lowest class/grade ". It should be strongly emphasized that the requirements presented in the table are the minimum requirements for any products.
8 Labelling	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):"
Annex I - Table 1: Allspice	<p>"<u>Total Ash on dry basis</u>": it is proposed to set the same requirement of 4.5% for all styles of allspice (also for ground/powdered), as no justification to have lower value for powdered (this would be in line with ISO 973).</p> <p>"<u>Acid Insoluble Ash on dry basis</u>": it should be considered to change from 1 to 0.4 for all styles in accordance with the provisions of the ISO 973 standard.</p> <p>"<u>Volatile Oil on dry basis</u>": to be in line with ESA and ISO 973, it is suggested:</p> <ul style="list-style-type: none"> - Whole: <ul style="list-style-type: none"> o 3% for Jamaican origin o 2% for other origins - Broken: 2% - Ground: 1% <p>"<u>Other factors</u>" – "<u>Non-volatile ether extract</u>": the term "on dry basis" should be added and the maximum value of 8.5 should be selected, in accordance with ISO 973, i.e. delete "min".</p>

<p>Juniper Berries</p>	<p><u>“Moisture content”</u></p> <ul style="list-style-type: none"> - whole: Natural juniper is a semi-dried product. 16% moisture can be obtained only after mechanical drying in oven. Natural dried juniper may have humidity up to 20-22% depending on the season. Therefore, it is suggested to add a note stating the 16% value is applicable only for machine dried juniper. Natural juniper moisture may be higher, up to 22%. - ground/powdered style the max. level 4 should be revisited whether it is correct. It seems it is a typo, because this value is impossible to be achieved in juniper ground. It is suggested to have 16%. <p><u>“Acid Insoluble Ash on dry basis”</u>: it should be considered to set the value “1” also for the ground/powdered style. This parameter is especially important for powdered style because of high fraud probability. The powdered style is more vulnerable to adulteration, so referring to a specific requirement is very important. In addition, there is no justification to set a lower value for powder.</p> <p><u>“Volatile Oil on dry basis”</u>: According to ISO 7377 the volatile oil content is divided according to 2 areas in 3 grades:</p> <ul style="list-style-type: none"> - Area 1: juniper berries having low volatile oil contents and for the lowest grade 3 it is min. 0.5 ml/100 g on dry basis; - Area 2 juniper berries having high volatile contents and for the lowest grade 3 grade it is min. 1.0 ml/100 g. <p>The proposed value in this draft standard (1.4) is close to the highest requirement for the highest class of juniper berries. According to point 3.2.2 the lowest level should rather be taken into account.</p> <p>Based on the provisions in the standard, the differences in the volatile oil contents based on the area where the spice comes from, should be taken into account, as it significantly affects the volatile oil content. It is proposed to have two different values for the 2 different area:</p> <p>Whole:</p> <ul style="list-style-type: none"> - Min. 0.5 ml/100g on dry basis for the area 1 (for Juniper from north EU and Russia has lower volatile oil content, as mentioned in the ISO standard) - min. 1.0 ml/100 g on dry basis for area 2. In the footnotes below the table could explain which origin each requirement applies to. <p>Cut/broken: Only dried berries can be cut: minimum 0.5% ml/100g.</p>
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	Ground/powdered: Only dried berries can be ground: minimum 0.5% ml/100g.
Star Anise	<p>“<u>Total Ash on dry basis</u>” and for “<u>Acid Insoluble Ash on dry basis</u>”: it is suggested to have for ground/broken “4” and “0.5” respectively, as proposed for the whole and cut/broken styles. This parameter is especially important for powdered style because of fraud probability. The powdered form is more vulnerable to adulteration, so referring to a specific requirement is very important. In addition there is no justification to set a lower level.</p> <p>“<u>Volatile Oil on dry basis</u>”: the draft standard sets the minimum at “7.0” ml/100g, while in ISO 11178 is “8”, therefore it is suggested to harmonize.</p> <p>“<u>Other Factors</u>” - “<u>Min. no fruit per 100g - 130 fruits/100g</u>” The EUMS would like to seek clarification as to why this parameter is presented in this table and not in table 2 for physical characteristics. If the parameter remains in this table, Annex II of the draft standard should be updated with a method for determining this parameter accordingly (as described in Annex A of ISO 11178).</p> <p>For abnormal and broken fruits is should be 25%/ max w/w.</p>
Annex I - Table 2: Allspice	<p>According to ISO standard 973 allspice “whole or ground shall be free from living insects and moulds”, so the “<u>Mould damage</u>” should be “0” for all styles.</p> <p>The value for “<u>Extraneous Matter</u>” and “<u>Foreign Matter</u>” should not be a combined value, as all the other spices have different values.</p> <p>Suggestion:</p> <p>For “whole”:</p> <ul style="list-style-type: none"> - Extraneous Matter: 0.5 % max - Foreign Matter: 0.5% (so that both combined make 1% as in ISO) <p>For cut/broken: to use the same value proposed for whole allspice (1% max)</p> <p><u>Other factors</u>: It is not clear why these filth requirements are mentioned only for allspice, and not for other spices in the standard, there for it is suggested to delete - similarly to all filth levels.</p> <p>Insects (live & dead) and mammalian excreta & hair (visible to naked eye, corrected if needed) should be practically absent as per ISO standard.</p>

	<p>This should replace all the numbers and requirements given in the table.</p>
Juniper Berries	<p><u>Extraneous Matter</u>: as ISO 7377 has a level 2.0 for third grade for extraneous matter, the same value is suggested also for cut/broken, as for whole.</p> <p>According to ISO 7377 “Juniper shall be free from living insects and moulds”, therefore we propose “0” for all styles in Table 2 for the “mould damage” parameter.</p> <p><u>Other factors</u>:</p> <ul style="list-style-type: none"> - Stalks are leaves or needles, the % varies on the grade and on the cleaning process, thus it should be covered under “Extraneous Matter %” (as indication for best grade). - Broken % w/w max 10 - it is suggested to use the ISO definition: <u>Damaged, discoloured, immature shriveled berries: 20% max w/w</u> - Off size: there is no definition what off-size means.
Star Anise	<p><u>Extraneous Matter</u>: the same value 2.0 is suggested also for cut/broken, as for whole.</p> <p>The ISO standard indicates that “For the purposes of this International Standard, all that does not belong to the star anise fruit and all other extraneous matter of animal, vegetable or mineral origin shall be considered as extraneous matter” and gives one requirement: “not be more than 2 % (m/m)” for such described requirement.</p> <p>It should be also considered to give the definitions of extraneous matter, foreign matter, immature, broken, shrivelled fruits below the table. For the broken and abnormal fruits, the definition presented in the ISO 11178 could be used: <i>“Broken fruits are classed as fruits which contain fewer than five follicles, while abnormal or undeveloped fruits are categorized as those containing three or more under-developed follicles”</i>.</p> <p><u>Other factors</u>:</p> <ul style="list-style-type: none"> - an additional clarification is required for the term „stalks 3%”, furthermore this could be covered under “Extraneous matter”, e.g.: 2% max w/w (with the exception of stalks, up to 3% max). - <u>The “Max. no fruit per 100g”</u>: the EUMS would like to seek clarification regarding what this parameter intends to achieve and what are the basis for choosing the given number (130). In case there is a method it should be referred to in Annex II of the draft standard.