

**Codex Committee on Spices and Culinary Herbs (CCSCH)
5th Session**

20-29 April 2021, virtual

European Union comments on

**Draft Standard for dried roots, rhizomes and bulbs–dried or dehydrated
ginger**

Agenda Item 4, CX/SCH 21/5/4

**Mixed competence
Member States vote**

The European Union and its Member States (EUMS) would like to thank Nigeria for leading the electronic working group on ginger.

The EUMS would like to provide the following comments:

Section 4:

The EUMS take note that CCSCH4 requested the Codex Committee on Food Additives (CCFA) to clarify how processing aids could be addressed under the Section 4 “Food additives” in accordance with relevant provisions in the Codex Procedural Manual (REP19/SCH, para. 39ii).

The EUMS observe that CCFA51, while considering the above request, noted that two substances (i.e. calcium oxide and sulphur dioxide) included in Chemical Requirements Section of the draft standard are associated with the functional class of bleaching agents and could potentially be considered as food additives rather than processing aids. Consequently, CCFA51 requested CCSCH to clarify this matter (REP19/FA, paras. 28-30).

Taking into account that “bleaching agents” is a recognised functional class within the Codex Alimentarius, the EUMS are of the view that INS 529 calcium oxide and INS 220-539 sulfites, if used for bleaching, are used as food additives and the draft standard should be amended accordingly.

Section 8.3 Country of origin/country of harvest

In line with our comments under item 2, the EUMS consider that the country of harvest should always be mentioned on the label, since the country of harvest is more relevant than the country of origin. Furthermore, the EUMS support the optional indication of the region of production.

Section 8.5 Inspection mark (optional)

In line with our comments under item 2, the EUMS suggest deleting this section as no information is available on what exactly “inspection mark” means.

Table 2

Since sulphites can be naturally occurring, the EUMS propose to delete the sentence '*Sulphur dioxide shall not be detected*' in **Table 2 (Notes)** and allow '*Sulphite SO₂ < 150 ppm*' instead. Depending on the method of analysis, even natural substances containing Sulphur may be titrated as SO₂. Therefore, a positive SO₂ result does not necessarily mean that the additive has been actively used.