

**European Union comments**  
**CODEX COMMITTEE ON SPICES AND CULINARY HERBS**  
**Codex Circular Letter CL 2019/98/OCS-CCSCH:**  
**"Proposed draft standard for dried oregano"**  
**Comments at step 6**

*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 will limit their comments to the sections of the standard identified by the Committee in the REP19/SCH, notably section 2, 8 and sections/wording into square brackets.

**2. Specific comments**

**2.1 Section 2.1 – Product definition**

As Table 1 plays a crucial role in the standard for oregano, the EUMS are in favor of retaining Table 1, with the indication of “generic name”, “trade name” and “scientific name”.

It is the understanding of the EUMS that the inclusion of the different species/varieties of oregano in Table 1 is based on the chemotype of the essential oil(s).

The EUMS note that during CCSC 4 the wording "...including but not limited to..." was added to paragraph 2.1 “Product definition”. This implies that the list provided for in Table 1 is not exhaustive and gives the possibility to classify as oregano species/varieties not previously discussed by the EWG and/or the Committee, and which may not have the chemical characteristics of oregano listed in Table 1. Therefore, the EUMS would favour the deletion of the sentence "...including but not limited to...".

**2.2 Section 3.2.2 - Odour, flavour and colour**

The EUMS would suggest retaining a reference regarding the need to guarantee the commodity is free from any form of adulteration.

**2.3 Section 5.1 – Contaminants**

The EUMS consider that the reference to the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014) should be retained. The dietary exposure to PAs should be as low as possible due to the potential health-threatening effects that can be caused by ingestion of these toxins via feed or food. To

achieve this, and in consideration of the high level of contamination with PAs found in oregano, management practices aimed at the prevention and reduction of contamination of food and feed with PAs must be undertaken.

## **2.4 Section 8.2 –Name of the product and section 8.3 - Country of harvest/origin**

**2.4.1 Section 8.2.2** - The EUMS support the inclusion of the scientific name of the products traded. In addition, the Committee should clarify what is intended by “varietal type”.

**2.4.2 Section 8.3.1** – The EUMS consider that it should be clarified whether both the country of origin and the country of harvest are to be indicated on the label, or whether the indication of either the country of origin or the country of harvest could suffice.

The EUMS support maintaining the indication of the region of production as optional.

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