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

20-29 April 2021, virtual

European Union comments on

Draft Standard for Oregano

Agenda Item 3

CX/SCH 21/5/3

Mixed competence Member States vote

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

The EUMS would like make the following comments.

Section 2.1 – Product definition

As Table 1 plays a crucial role in the standard for oregano, the EUMS are in favor of simplifying Table 1 and keeping the indications of "generic name" and "scientific name", and deleting the "trade name".

General name	Scientific name
Oregano-Origanum	Origanum L. spp., except Origanum majorana L.
Oregano-Lippia	<i>Lippia L.</i> spp.

The reason we propose this deletion is that using oregano trade names which are derived from the geographical regions may confuse consumers and the market as to the country of origin and/or country of harvest. For instance, the Cretan oregano (*Origanum onites* L.) is grown/cultivated not only in the Cretan island of Greece but also in Aegean islands and in other parts of the mainland of Greece, as well as in other North-East Mediterranean countries, like Turkey. So if the trade name of 'Cretan oregano' were to be labelled on the product, when in fact the country of harvest is Turkey, the trade name may create a great deal of confusion for consumers.

Moreover, since in our understanding the inclusion of the different varieties/species of oregano in the standard is based on the chemotype of essential oils contained in it, the EUMS propose to delete Sword oregano (*Satureja spp. L.*) from table 1, since:

- all species of the genus *Satureja* fall under "Savory" according to the European Pharmacopoeia, the European Spice Association, the American Spice Association, the <u>Mansfeld's database</u> and the <u>GRIN-Global by the U.S. National Plant Germplast</u> <u>System;</u>
- a separate ISO standard exists for *Satureja*, which means that this is a totally different plant;
- the carvacrol content in *Satureja* is often below 50% of the total essential oil, and it does not smell and taste as oregano.

Therefore, *Satureja montana* and *Satureja hortensis* should not be included in the oregano standard and a different Codex standard is developed for them as "Savory".

In addition, a typo error in the Table 1 of CX/SCH 21/5/3 should be corrected. The letter L. (Linnaeus) should follow the scientific name Origanum and not appear after the abbreviation ssp. (meaning different species). So, in Table 1 of CX/SCH 21/5/3 it should be stated Origanum L. spp' instead of 'Origanum spp. L.'.

Section 8.2.2

The EUMS consider that the scientific name and style of the product should be mandatory only when the product is offered for direct consumption, and not when it is used as an ingredient in a compound food, for the following reasons:

- 1) the <u>size of labels</u> is limited. This fact is even more challenging as most of the labels are multilingual, making the space available for information to be reduced to a minimum;
- 2) <u>consumers' information</u>. Consumers do not buy a particular food for its oregano content (like in potato chips with oregano). In such a case, the scientific name of oregano in not the main driver for the consumer's food choice. However, if oregano is sold directly a herb, then the consumer may want to find the oregano species and quality standards on the label.

Therefore, the EUMS propose a new wording for section 8.2.2. as follows:

Section 8.2.2:

'The general name, scientific name and style of the product shall be noted when the product is offered for direct consumption. In all other cases, the general name is sufficient. Classification may be indicated as described in Table 1 and Sections 2.1 and 3.2.3. In case of products consisting of blends of different Oregano species, the name of the product may be followed by the Oregano species in order of descending quantity.'

Section 8.3 Country of origin

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