ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 6th SESSION OF THE CODEX COMMITTEE ON SPICES AND CULINARY HERBS

26th – 30th September and 3rd October 2022 - Virtual Meeting

AGENDA ITEM 3.1

DRAFT STANDARD FOR DRIED SAFFRON

(At Step 7)

Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 6th session of the **Codex Committee on Spices and Culinary Herbs**, scheduled to take place virtually September 26th – 30th and 3rd October 2022. This document is intended for possible use by the Codex communities of practice, promoted by GFoRSS and PARERA, as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background, and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above (PARERA and GFoRSS), their membership, or their management. It provides a synthesis and analysis of the work currently under discussion by the CCSCH, which may be useful for delegations from Arab countries to prepare their positions considering the needs and specificity of the region and the potential impact of the proposed food standards.

This analysis is prepared as part of the **Codex Initiative for the Arab Region**: ***Arab Codex Initiative***, implemented by PARERA and GFoRSS, hosted and coordinated by the Arab Industrial Development, Standardization and Mining Organization (AIDSMO), and funded by the US Codex Office, US Department of Agriculture.

**It is important to note that experts – members of the Arab Expert Working Group – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the Arab Expert Working Group proceedings is based on each expert's own credentials and experience, which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

Documents

CX/SCH 22/6/3

CX/SCH 22/6/3 Add.1

Recommendations formulated by the EWG chaired by Iran and co-chaired by Greece

In its 6th session, CCSCH is invited to:

- Review the proposed standard draft for dried Saffron (at Step7) considering Codex members and observer's comments on sections "3.2.2 Chemical and physical characteristics", Annex I and Annex II, "3.2.3 Classification", and "8.3 Country of origin and country of the harvest".
- Finalize the standard draft Based on all comments received.

Background

CCSCH3 (2017) agreed to establish an EWG chaired by Iran and co-hosted by India to elaborate on the specific requirements for Saffron based on the concept of a group of standards i.e., category of "Dried Floral Parts".

The terms of reference indicated that the EWG (Saffron) will have to collaborate with the EWG (Cloves) to develop the overall standard for "Dried Floral Parts".

During **CCSCH4 (2019), t**he proposed draft standard was discussed, and an agreement was reached to forward it to CAC42 for adoption at step 5. The committee agreed also on the re-establishment of the EWG chaired by Iran to consider the outstanding issues.

CCSCH5 (2021) agreed to:

- hold the draft standard for dried saffron at Step 7 and return it for consideration at step 6, particularly regarding sections: 3.2.2 Chemical and physical characteristics, Annex I and Annex II, "3.2.3 Classification", and "8.3 Country of origin and country of the harvest" as the only provisions to be considered for comments and to re-examine the proposed standard at CCSCH5; and
- re-establish an EWG, chaired by Iran and co-chaired by Greece, to consider only the outstanding issues, namely sections "3.2.2 Chemical and physical characteristics", Annex I and Annex II, "3.2.3 Classification", and "8.3 Country of origin and country of the harvest".

CCSCH5 agreed that no further comments would be requested nor discussion on the standard would be held at its next session, apart from the sections highlighted above that were returned to Step 6 for comments and further consideration at its next session.

Analysis

For the first round of circulation, the EWG received comments from 5 members including: Morocco, Japan, Canada, Greece, and USA. All members' comments focused on Section "Chemical and physical characteristics", "Classification" and "Country of origin and country of harvest". A summary of those comments is presented in **Table 1**, attached as **appendix 1** to this document.

Upon the development of the updated draft, a new circular letter (CL) 2022/25/OCS-SCH was initiated, and its deadline was reached on 26/08/2022. More comments were received by the Codex Secretariat, and focused on the following sections, summarized in **Table 2**.

Table 2: Comments received as responses to the CL 2022/25/OCS-SCH.

Section	Comment
General comments	• Cuba, India, Peru, and Philippines supported the adoption of the proposed draft. • The United States of America submitted the following comments: The CCSCH must realize that the relevance of its work is not solely based on the standards being technically correct, but also the timeliness of the standards to stakeholders. Codex standards must reflect international trade practices, therefore, the inclusion of unwarranted provisions and those that cannot be verified must be avoided. For such inclusions reduce acceptance and application of the standard along with raising concerns about the of Codex and its activities.
Classification	• Canada suggested removal of 'extra class'. • Saudi Arabia suggested considering classifications and chemical and physical characteristics as mentioned within the ISO 3632-1:2011 SPICES — SAFFRON (CROCUS SATIVUS L.) — PART 1: SPECIFICATION standard. • The United States recommended deleting/omitting Extra Class from the standard.
Labelling	• Canada and India suggested that country of harvest should be optional. • The United States recommended CCSCH6 to adhere its decision taken at CCSCH5 (REP 21/SCH, para 19) based on advice of the CCFL 45 (REP21/FL para 40) that: - Country of origin is mandatory - Country of Harvest and region of harvest as optional

Considerations for the Arab Region

AIDSMO develops Unified Arab Standards and technical regulations through specialized Arab technical committees.

The Arab EWG reviewed the chemical and physical characteristics for Saffron required by the proposed Codex standard in comparison with the Arab Standard 1455-2002.

Tables 3 and 4 offer this comparative representation.

Table 3: Comparative study between the Chemical Requirements of the Codex standard and the Arab Standard 1455-2002.

	Class	Moisture content %w/w (max)		Total ash on dry basis % w/w(max)	Acid insoluble ash on dry basis %w/w	Water soluble extract cold on dry matter % max	Taste strength	Aroma strength		Colouring strength
		Filament and cut filament style	Powdered style				(Picrocrocin)	(Safranal)		(Crocin)
							Min	Min	Max	Min
Codex standard	**Extra class**	12.0	10.0	8.0	1.0	65	80	20	50	230
	I	12.0	10.0	8.0	1.0	65	70	20	50	200
	II	12.0	10.0	8.0	1.0	65	55	20	50	170
	III	12.0	10.0	8.0	1.0	65	40	20	50	120
Arab Standard	**Extra class**	12.0	10.0	8.0	1.0	65	70	20	50	190
	I	12.0	10.0	8.0	1.0	65	55	20	50	150
	II	12.0	10.0	8.0	1.5	65	40	20	50	110
	III	12.0	10.0	8.0	1.5	65	30	20	50	80

Table 4: Comparative representation of the Physical Requirements of the Codex standard and the Arab Standard 1455-2002.

Codex standard

Product	Class/Grad	Extraneous Matter (Floral waste) % w/w (max)[1]	Foreign Matter % w/w (max)[2]
Saffron Filament and Cut Filament	Extra Class	0.1	0.1
	I	0.5	0.1
	II	3	0.5
	III	5	1.0

[1] *Extraneous matter: Vegetative matter associated with the plant from which the product originates but not accepted as part of the final product (i.e., **floral and plant waste**).*
[2] *Foreign Matter: Any visible/detectable objectionable foreign matter or material not usually associated with the natural components of the spice plant, such as sticks, stones, burlap bagging, metal, etc.*

Arab standard

Product	Class/Grad	Floral waste % m/m max	Extraneous Matter % m/m max
Saffron Filament and Cut Filament	Extra Class	0.5	0.1
	I	4	0.5
	II	7	1.0
	III	10	1.0

Analysis / Conclusion and recommendations

In some instances, the Codex requirements would bring what could be perceived as more restrictive requirements than what is being applied through the Arab standard.

It is not clear from the information available, to what extent the Arab standard is being applied and followed by Arab food regulatory jurisdictions for the characteristics of Saffron.

Given that the proposed Codex requirements are for the most part, meant to align with the relevant ISO standard, it may be suggested that the Arab standard be revised, upon adoption of the Codex standard, to align it with international requirements.

- Saffron is one of the important commodities in the Arab region, mainly in the field of food, medicine, perfumes, and cosmetics. Being highly produced in some Arab countries (such as Morocco) as well as being exported from it, therefore any development of Codex standard related to this commodity should be closely followed, considered, and implemented in the region.
- Morocco's Codex team was part of the electronic Working Group and contributed significantly to the drafting of the standard, which therefore is deemed to reflect the current realities of Saffron production in the Arab region.
- Given the level of development of this standard and its importance, it is recommended that Arab Codex delegations support its advancement to its final adoption by CAC45 (2022). It will support the trade interests of countries of the region as producers, exporters, and importers of this commodity.

Appendix 1

Table 1 : Summary of Comments received during the first round of circulation.

Section	Comment
Classification	• Two members commented that 'extra class' should be deleted arguing that the minimum value of 230 as coloring strength (crocin) is difficult to achieve by the industry after the 2nd or 3rd year of storage of ground saffron. It was acknowledged that although the fresh cropped saffron has (indeed) a color strength of around 220-230, this is not sustainable after a few months, as the color degrades with time. It was pointed out that by setting such rigid standards, there may be an issue with keeping the color values throughout saffron's shelf life and might create opportunities for fraudulent practices in the supply chain. EWG didn't accept it because quality degradation is a common phenomenon for many non-processed categories of foods of plant origin depending on storage conditions and storage duration. • EWG decided to keep the 'extra' class because it promotes the competitive advantages of the highest quality of marketed saffron and serves as a trade requirement for differentiation compared to the saffron classes I, II, and III. 'Extra class' is achieved by applying good practices in the field and extra care by workers. The inclusion of 'extra class' is essential to ensure that good practices will continue to be effective, resulting in the commercialization of a top-quality product worldwide. In this way, a range of different quality products is available to consumers, with the cost being proportional to the quality. • EWG proposes to maintain 4 classes in the draft standard in line with the decision of CCSCH5 to keep the three Grades/Classes, as these are described in the relevant ISO standard 3632-1 for saffron (for reasons of consistency), and to add one more class (extra class) to highlight the high-quality characteristics of saffron.
Chemical characteristics	• One member asked the replacement of 'ND' (Not Detected) to 'NP' (Not Permitted), because the wording is not scientifically correct. If colorants are not permitted (as adulterants) it should be clearly stated otherwise the word 'not detected' might be erroneously interpreted that they are permitted if they are not detected. This was accepted by EWG.
Physical Characteristics	• One member noted that entries for physical characteristics for saffron powder were either 'NA' (Not Applicable) or 'zero values' when the corresponding physical characteristics for saffron filament and cut filament had either numerical values or 'NA'. This was questioned since the whole and cut filaments with defects are ground into powder, so defects are not expected to disappear in the powder form. EWG accepted to delete 'NA' (Not Applicable) for powder form and either: to be replaced by N/A ('Not applicable, means that this form of the above product has not been evaluated for this provision, and currently we do not have values. N/A does not refer to zero') or to introduce numerical values (if these are available). The EWG accepted to use (NA) - Not Accepted as in ISO Standard 3632-1:2011.
Country of origin and country of harvest'	• With respect to the country origin/country of harvest indications on product labels, it was agreed that there was a need to clarify both the country of origin and country of harvest as requested by CCFL. Two members proposed Country of Harvest to be optional and Country of Origin to be mandatory, as expressed at CCSCH5 and in-line with REP21/SCH (paragraph 19) as to be in alignment with

	other standards adopted by CCSCH and the advice from CCFL in the General Standard for the Labelling of Prepackaged Food (GSLPF) and WTO Rules. • Two members commented that country of harvest shall be mandatory, and shall be applied exceptionally for saffron, since this may serve as the only means or easy way to prevent fraudulent, adulteration practices in international trade. It was pointed out that the terms country of harvest and country of origin on product labels for culinary herbs are often confused by consumers and may also be misinterpreted by food business operators. Therefore, consumers will receive accurate information regarding the nature (where it is harvested) and would be allowed to make informed choices regarding the (high quality) organoleptic characteristics of the product linked to a higher price. • EWG would like to note that CCSCH5 concluded that should the need arises, the use of country of origin and country of harvest (mandatory or optional) indications on product labels would be reconsidered in individual standards (see CCSCH5 report, para 19, II). Exceptionally for the case of saffron standard, indication of country (and region) of harvest shall be mandatory, as a strong need to protect this delicate product from fraud phenomena. • One member submitted comments on two sections of the draft standard that fell out of TOR of this EWG. More specifically, one comment referred to 2.1 'Product Definition' that it should only indicate the scientific and common name of the plant and the name of the plant/floral part being used, since the name confuses and is congested. EWG noted that the product definition is extensively discussed and closed at CCSCH5. Besides, this is not an open point for discussion according to the mandate of this electronic working group, as established at CCSCH5 (see CCSCH5 report, 98, II). The second comment referred to 2.2 Styles that definitions should accompany next to the names of the three different styles. EWG noted that this is not necessary since the definition of different styles for saffron is already provided at the end of 2.2.
Methods of analysis and sampling'	• Codex secretariat commented that CCSCH5 agreed to align methods of analysis and sampling with those provided in CRD6 Rev. EWG would like to note that Table 9.1 could be deleted and be replaced by the sentence, which reads: "For checking the compliance with this standard, the methods of analysis and sampling contained in the ISO 3632-2 - Spices – Saffron (Crocus sativus L) – Part 2 Test methods relevant to the provisions in this standard, shall be used".