



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS**

3rd Session

Chennai, India, 6 -10 February 2017

COIMMENTS ON DRAFT STANDARD FOR CUMIN

Comments at Step 6 (Replies to [CL 2016/23-SCH](#))

(Comments of the United States of America)

General Comments

The United States generally supports the development of a standard for Cumin in the Codex Committee on Spices and Culinary Herbs (CCSCH) and is pleased to submit the following specific comments in response to CL 2016/23 -SCH, Request for Comments at Step 6 on the Draft Standard for Cumin.

The specific U.S. comments below are guided by the fact that the standard should (i) include measurable parameters that are already accepted and therefore verified by the inspectors, established recognized regulations and/or trade thereby facilitating its uniform international application and (ii) reflect international trade practices.

Specific Comments

1. Scope

Issues and Rationale for change

Part of the plant being used: A consistent identification and mention as to which part of the plant (fruit or seed) is being standardized by the electronic Working Group (eWG) and the CCSCH is needed. The current draft document being developed by the eWG on Grouping identifies cumin within the seed group; whereas, the Scope of this draft standard identifies Cumin as a fruit. The United States recommends the identification as a seed and as such, “seed” is used where necessary throughout the U.S. comments.

Consistent terminology and format of the Scope with other Codex commodity standards: The term “Further Processing” is customarily used for exclusions in fresh fruits and vegetables standards, and sometimes jointly with industrial processing in some processed fruit and vegetable standards. The use of this phrase is largely dependent on what is most appropriate and accepted within international trade. Our research in preparing the Discussion Paper on the term “Further Processing” as regards to CCSCH standards indicate – within the dried spices and culinary herbs industry “further processing” is used to describe the intermediary function such as of cleaning, sorting, and grading that is carried out before and/or after export in getting the product ready for sale or export, and not for transformation of the nature of the product for oils and flavor extraction.

Recommendation: Taking the preceding two points into consideration, the United States recommends the following revised Scope.

“This Standard applies to dried seeds of any cultivated varieties (cultivars) of *Cuminum cyminum* L. of the *Apiaceae* family offered as a condiment and for direct human consumption, commercial food processing or for repackaging if required. It excludes cumin intended for industrial processing.”

3.2.4 Physical Characteristics

Table 1. Physical Requirements for whole cumin

Issues and Rationale for change

Extraneous matter content: In the absence of a Total Tolerance for defects in each class, the tolerance levels for

“Extraneous matter” of 1, 2 and 3 percent are too high. The values indicated in the draft means that in Class I - 1.0 percent, Class II - 2.0 percent, and Class 3- 3.0 percent of the lot can comprise extraneous matter. We find these tolerances to be too high. Therefore the United States recommends tolerances of 0.5 percent in Class I, 1.0 percent in Class II, and 2.0 percent in Class III.

Foreign Matter Content: The requirement indicating that foreign matter content for Class I as “practically absent” is very subjective. “Practically absent” literally allows every inspector/country and/or trader to impose their interpretation. Therefore, the United States proposes that a numerical value of .5 is assigned to facilitate uniform interpretation.

Insect-damaged Matter: The comments here are identical to those for extraneous matter content (see above). The United States recommends lowering the tolerances to 0.5 percent in every class.

NEW ADDITION: Seeds with stalks attached: This common defect in whole cumin is recommended for inclusion in Table 1 along with maximum dimensions allowed, as permitted in trade practices.

Below please find the Proposed Revisions to the table with U.S. recommendations.

Table 1. Physical requirements for whole cumin

Parameter	Class/Grade		
	I	II	III
Extraneous matter ¹ content, maximum.% mass fraction	1 0.5	2 1	3 2
Foreign matter ² content, maximum.% mass fraction	practically absent 0.5	0.5	0.5
Proportion of damaged/defective fruits seeds ³ , maximum.% mass fraction	5	5	5
Insect-damaged matter ⁴ , maximum. % mass fraction	1 0.5	1 0.5	1 0.5
Seeds with stalks attached exceeding 7mm in length and 2mm in diameter	8	8	8

1. Contamination by objectionable valueless parts of the raw plant material and other foreign plant material may contaminate the product and require special attention for removal. This general category is intended to include all other miscellaneous objectionable matter not reported in the other specific categories.

2. Contamination by objectionable foreign matter such as sticks, stones, burlap bagging, or cigarette butts may enter the product at various points during its production, transit, and storage because of improper preparation or handling. This general category is intended to include all other miscellaneous objectionable matter not indicated in the other specific categories.

3. Blemished, cracked, worthless seeds.

4. Evidence of insect feeding, frass or insect fragments that detracts from product appearance, overall quality and/or safety.

3.2.5 Chemical Characteristics

Table 2. Chemical requirements for whole, cracked and ground cumin

Issues and Rationale for change

Moisture—The United States recommends the moisture content requirement to be consistent with trade practices of 9.0 percent in all classes and all styles of cumin.

Total ash— The United States recommends the total ash content requirement of 9.5 percent for Class I.

Below please find the Proposed Revisions to the table with U.S. recommendations.

Table 2. Chemical requirements for whole, cracked and ground cumin

Parameter	Requirement for grade, whole and cracked cumin			Requirement for ground cumin
	I	II	III	
Moisture, % mass fraction, maximum	10 9	10 9	10 9	10 9
Total ash, % mass fraction, (dry basis)	8.5 9.5	10	12	9.5
Acid-insoluble ash, % mass fraction (dry basis) maximum	1.5	3	4	1.5
Volatile oils, ml/100g (dry basis), minimum	2	1.5	1.5	1.3

The United States would like to clarify to the Cumin e-WG and the CCSCH of the following standardization practices:

- for parameters with maximum value levels, values below the maximum are accepted, and
- for parameters with minimum values, values greater than the minimum are acceptable