

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

CX/SCH 24/7/6 Add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Seventh Session

Kochi, Kerala, India

29 January – 2 February 2024

PROPOSED DRAFT STANDARD FOR TURMERIC

Comments in reply to CL 2023/56/OCS-SCH

Comments of Brazil, Canada, Chile, Egypt, Indonesia, Iraq, Jamaica, Madagascar, Malaysia, Peru, Saudi Arabia, Thailand, Uganda, USA and American Herbal Products Association

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/56/OCS-SCH issued in October 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX I**General comments**

COMMENT	MEMBER / OBSERVER
<p>The United States of America in support of the work of Codex Alimentarius and the Codex Committee on Spices and Culinary Herbs submits the following comments in response to the Proposed draft Standard for Turmeric (at Step 3)</p> <p>Codex standards should reflect (i) existing global trading practices and consumer concerns, (ii) the unique characteristics of the individual FFV being standardized and (iii) should not impose unwarranted restrictions and/or requirements. It is highly beneficial to include Turmeric with the rest of the Group Standard on Dried Roots, Rhizomes, and Bulbs.</p>	USA
<p>Indonesia thanks The Islamic Republic of Iran and India for preparing this draft. We continue to support the standard development as well using the standard template approach for group standards.</p>	Indonesia
<p>Regarding the 'CL 2023/56/OCS-SCH: Request for Comments, at Step 3, on the Proposed draft Standard for dried roots, rhizomes and bulbs – Turmeric (ref. CX/SCH 24/7/6),' we would like to suggest a modification in the TOTAL ASH column and an inclusion of a column for VOLATILE OIL in the 'Table 2 - Chemical Characteristics for Dried or Dehydrated Turmeric' (indicated in red), reflecting the ESA values that are used as a parameter for international trade. As it is not possible to alter the document's spreadsheet in the OCS system, we will submit a CRD with the comments.</p>	Brazil
<p>Agree. Regards</p>	Iraq

Specific comments

TITLE	
<p>PROPOSED DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES-<u>RHIZOMES</u>, AND BULBES-<u>BULB-S</u>- TURMERIC</p> <p>There are many inconsistencies in formatting and spacing throughout this document.</p>	USA
<p>PROPOSED DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBES-<u>BULBS</u>- TURMERIC</p>	Canada
<p>PROPOSED DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBES-<u>BULBS</u>- TURMERIC</p> <p>Minor misspelling.</p>	American Herbal Products Association
2. DESCRIPTION	
2.1 Product Definition	
<p>2.1 Product Definition</p> <p>Egypt suggests to include the primary (bulbs) or secondary rhizomes</p> <p>Product Definition:</p> <p>Dried or dehydrated turmeric is the product obtained from drying primary (bulbs) or secondary rhizomes (fingers) of the of plants <i>Curcuma longa</i> L. of Zingiberaceae family as described in Table1.</p> <p>Rationale:</p> <p>Turmeric may be found as primary (bulbs) or secondary rhizomes (fingers) of the plants of <i>Curcuma long a</i> Linn and <i>Curcuma domestic a</i> Veleton.</p> <p>Reference:</p> <p>Indian Standard; SPICES AND CONDIMENTS — TURMERIC, WHOLE AND GROUND — SPECIFICATION</p>	Egypt
<p>2.1 Product-<u>d</u>Definition<u>efinition</u></p>	Canada

Table 1: Common and scientific name of dried Turmeric.	
Egypt suggests to add scientific name as follows: <ul style="list-style-type: none"> • Curcuma longa L. of Zingiberaceae family • Synonyms:(Curcuma domestica Valetton) 	Egypt
Table 1: Common and scientific name of dried <u>or dehydrated</u> Turmeric.	
Scientific Name	Thailand
<p><i>Curcuma longa</i> L. of Zingiberaceae family</p> <p>The family name in table 1 should be deleted because they duplicate the text in Section 2.1.</p>	
2.2 Styles	
<p>Turmeric is identical to ginger in having whole single or branched rhizomes, they are also cut into pieces not crushed cracked and broken. Therefore, the US recommends copying the said text from the Standard for dried and dehydrated ginger (CXS 343-2021) applicable to the whole and pieces styles. These changes should be made where necessary in the draft standard.</p> <p>- Whole: <u>single or branched rhizomes of varying sizes, which may be cut at both ends with the flattened circular shape intact</u></p> <p>Pieces - comprising various cut, diced, or sliced styles Crushed/Cracked/Broken; and</p> <p>Crushed/Cracked/BrokenCrushed/Cracked/Broken/Sliced; and</p>	USA
<p>Indonesia proposes to add "Sliced" as part of Styles and be incorporated as follows:</p> <p>- "Crushed/ Cracked/Broken/Sliced".</p> <p><i>Rationale:</i> Dried turmeric generally is also traded in sliced form.</p>	Indonesia
<p>Pieces: comprising various cut, diced or sliced styles; and Crushed/Cracked/Broken; and</p> <p>Thailand propose to revised the style of crushed/cracked/broken. By using the same text as standard for dried or dehydrated Ginger.</p> <p>- Other styles distinctly different for those three are allowed, provided they are labeled accordingly.</p>	Thailand
ESSENTIAL COMPOSITION AND QUALITY FACTORS	
3.1 Composition	
Egypt suggests to delet "Annex II" from the Composition	Egypt
Dried or dehydrated turmeric as described in Section 2 above shall conform to the requirements specified in Annexes I and II.	Thailand
<p>Dried or dehydrated turmeric as described in Section 2 above shall conform to the requirements specified in Annexes I and II<u>Annex I</u></p> <p>Since Annex II is methods of analysis, composition should meet requirements specified in Annex I only.</p>	Canada
Quality Criteria criteria	
Quality Criteria factors	Thailand
3.2.2 Chemical and physical characteristics	
<p>Chemical and physical characteristics</p> <p>Please consider the inclusion of comment below as footnote</p> <p>Volatile oil content may vary with different varieties that are currently in trade</p>	Jamaica
Chemical and physical characteristics <u>Classification (optional)</u>	Malaysia

Chemical and physical characteristics Egypt suggests to delete Annex II	Egypt
Dried When dried turmeric shall comply with the requirements specified in Annex I (Chemical Characteristics - Table 2) and Annex II (Physical Characteristics - Table 3). The defects allowed must not affect the general appearance of the product as regards to its quality classified, keeping quality the chemical and presentation physical characteristics in Annexes I apply as the package- minimum requirements. - To align with the information in the Annex I. - To align the arrangement of essential composition and quality factors with the template for the spices and culinary herbs standards.	Malaysia
Dried or dehydrated turmeric shall comply with the requirements specified in Annex I (Chemical Characteristics - Table 2) and Annex II (Physical Characteristics - Table 3). The defects allowed must not affect the general appearance of the product as regards to its quality, keeping quality and presentation in the package.	Thailand
Classification (optional) Chemical and physical characteristics	Malaysia
Classification (optional) Egypt suggests to delete Annex II	Egypt
When dried Dried turmeric is traded as classified, shall comply with the chemical and physical characteristics requirements specified in Annexes Annex I (Chemical Characteristics - Table 2) and II apply (Physical Characteristics - Table 3). The defects allowed must not affect the general appearance of the product as regards to its quality, keeping quality and presentation in the minimum requirements package. - To align with the information in the Annex I. - To align the arrangement of essential composition and quality factors with the template for the spices and culinary herbs standards.	Malaysia
When dried turmeric is traded as classified classified/graded, the chemical and physical characteristics in Annexes I and II shall apply as the minimum requirements.	Thailand
When dried or dehydrated turmeric is traded as classified, the chemical and physical characteristics in Annexes I and II apply as the minimum requirements.	
4. FOOD ADDITIVES	
4.1 Anticaking agents listed in Table 3 of the <i>General Standard for Food Additives</i> (CXS192-1995) are acceptable for use in the ground/powdered form of product conforming to this standard.	USA
5. CONTAMINANTS	
CONTAMINANTS Jamaica proposes the inclusion of specification for presence of Mycotoxin (Aflatoxin, Ochratoxin). Total mycotoxin ≤10ppb; Aflatoxin ≤5ppb.	Jamaica
The products covered by this Standard shall comply with the maximum levels of the <i>General Standard for Contaminants and Toxins in Food and Feed</i> (CXS 193-1995) and any other relevant 193-1995), <i>Code of Practice for the Prevention and Reduction of Mycotoxins in Spices</i> (CXC 78-2017) and other relevant Codex texts.	USA
6. HYGIENE	
It is recommended that the products covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the <i>General Principles of Food Hygiene</i> (CXC 1-1969) the <i>Code of Hygienic Practice for low moisture foods</i> - <i>Low Moisture Foods</i> (CXC 75-2015) Annex III Spices and Aromatic Herbs and other relevant Codex texts.	USA
It is recommended that the products covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the <i>General Principles of Food Hygiene</i> (CXC 1-1969) the <i>Code of Hygienic Practice for low</i>	Canada

moisture foods <u>Low Moisture Foods</u> (CXC 75-2015) Annex III Spices and Aromatic Herbs and other relevant Codex texts.	
The products should comply with any microbiological criteria established in accordance with the <i>Principles and Guidelines for the Establishment and Application of Microbiological Criteria for Related to Foods</i> (CXG 21-1997).	
The products should comply with any microbiological criteria established in accordance with the <i>Principles for the Establishment and Application of Microbiological Criteria for Related to Foods</i> (CXG 21-1997).	Thailand
8. LABELLING	
Uganda recommends that sub clauses on the net weight and company name be included in the standard	Uganda
The products covered by the provisions of this Standard shall be labelled in accordance with the <i>General Standard for the Labelling of Pre-packaged Prepackaged Foods</i> (CXS 1-1985). In addition, the following specific provisions apply:	Canada
8.2 Name of the Product product	
8.3 Country of Origin origin and country of harvest.	
Country of Origin and country of harvest-	USA
Country of harvest (optional). Country of harvest shall be declared	Saudi Arabia
Labelling of Non-Retail non-retail Containers containers	Canada
9. METHODS OF ANALYSIS AND SAMPLING	
Jamaica suggests that the same provision governing ginger could serve as a guide.	Jamaica
Egypt suggests to correct the number of table (1) instead of (4) As described in Annex II, Table 1	Egypt
9.1 Methods of Analysis analysis ¹	Canada
9.2 SAMPLING PLAN	
Sampling plan SAMPLING PLAN	Canada
ANNEX I	
Table 2. Chemical Characteristics for Dried or Dehydrated Turmeric Jamaica proposes that Total ash is 8% max (according to ISO 928), but may be lowered to 7% as put forward.	Jamaica
Table 2. Chemical Characteristics for Dried or Dehydrated Turmeric Change Crushed/Cracked/Broken in column 2 to Pieces - Whole Total Ash – 8 - Acid Insoluble Ash – 2 Powdered/Ground Total Ash - 9 (According to ISO, Jamika, and Agmark India the Value is 9)	USA
Table 2. Chemical Characteristics for Dried or Dehydrated Turmeric Indonesia proposes the value of total curcuminoids % (colouring power) on dry basis (min) to be 3% for all dried or dehydrated turmeric styles <i>Rationale:</i> Considering the total curcuminoids amount from dried or dehydrated turmeric generally may exceed 2%. Indonesia proposes the value of total ash % (max) to be 9% for all dried or dehydrated turmeric styles	Indonesia

<p><i>Rationale:</i> In line with ISO 5562-1983 (E) and general condition: total ash content for dried or dehydrated turmeric is around 9%.</p>	
<p>Table 3. Physical Characteristics for Dried or Dehydrated Turmeric</p> <p>3rd column heading - change to Insect Damage</p> <p>4th column - change to Mould Damage</p> <p>2nd column/2nd row - change to Pieces</p> <p><u>Whole</u></p> <ul style="list-style-type: none"> • Mould Damage – 3 • insects Dead – 3 • Extraneous Matter - 0.5 • Whole Foreign Matter – 2 • Whole Mammalian Excreta – 11 • Whole Other Excreta – 11 • Powdered/Ground Extraneous Matter - 1 	USA
<p>Table 3. Physical Characteristics for Dried or Dehydrated Turmeric</p> <p>1-In column 9 where Mammalian excreta % mg/kg(max) is defined: Chile recommends removing the % sign. And only leaving it as mg/kg</p> <p>2-Mould Visible /Insect defiled / infested.% w/w (max) //// Whole: Chile agrees with the proposed value</p> <p>3-Live insects(By count)/100 g (max) //// Whole: Chile agrees with the proposed value</p> <p>4-Other Excreta3, % mg/kg, (max) ///Crushed/Cracked/Broken: Chile agrees with the proposed value.</p> <p>5-[Damaged Rhizomes % w/w (max)]/// Powdered /Ground: Chile agrees with including the parameter and the proposed values.</p>	Chile
<p>Table 3. Physical Characteristics for Dried or Dehydrated Turmeric</p> <p>1- Egypt agrees [Damaged Rhizomes % w/w (max)] with (5%) for whole Turmeric, and also agree with 0 count /100 g (max) of the Live insects in all styles.</p> <p>2- Egypt suggest the following additions:</p> <ul style="list-style-type: none"> • Add a Defective Rhizomes instead of Damaged Rhizomes • Add a definition of Defective Rhizomes under table 2 as follow: Defective Rhizomes: These include immature, small, shriveled fingers and/or bulbs, internally damaged, hollow or porous rhizomes, rhizomes scorched due to boiling and other types of damaged rhizomes <p><u>Reference</u> - Indian Standard; SPICES AND CONDIMENTS — TURMERIC, WHOLE AND GROUND — SPECIFICATION</p>	Egypt
<p>Table 3. Physical Characteristics for Dried or Dehydrated Turmeric</p> <p>Madagascar proposes to adopt a value of ZERO (meaning completely absent) for the presence of whole dead insects, foreign matter, mammalian excreta and other excreta. The presence of such waste greatly reduces the quality of turmeric, even if it is not in powdered form.</p>	Madagascar
<p>Table 4. Method of analysis</p> <p>Remove MPM V8 as a method and make ISO927 a Type I method. ISO927 could be the definitive Type I since it uses MPMV8 as a reference within ISO 927 and Turmeric is specifically called out in ISO 927 which is a validated method.</p>	USA

** For whole Turmeric preparing turmeric prepare sample followed by <u>according to</u> ISO 2825	
** For whole Turmeric preparing sample followed by ISO 2825 Why are these starred and not a footnote number?	