

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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Agenda Item 4

CRD13

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 (CX/SCH 24/7/6)

(Comments of the European Union, India, Kenya, Morocco, Nigeria, Senegal, Thailand, Uganda, and the United Republic of Tanzania)

The European Union

The European Union and its Member States (EUMS) would like to thank Iran (Islamic Republic of) and India for updating the draft **Standard for dried roots, rhizomes and bulbs – Turmeric**.

The EUMS would like to submit the following comments:

PARAGRAPH	COMMENTS
2.1 Product Definition	<p>We suggest that the product definition is replaced by, as referred to in ISO 5562:</p> <p><u>"Dried or dehydrated turmeric is the product obtained from drying of the cured rhizomes of plants <i>Curcuma longa</i> L. of Zingiberaceae. The curing process is done by soaking the rhizomes in boiling water. Dried rhizomes may be in natural form, or machine polished."</u></p> <p>Table 1: A new column with a "Trade name" should be inserted to be consistent with the draft template for SCH standard and with other draft standards, such as chilli peppers and paprika..</p>
8.1	<p>Editorial comment: The first sentence should be presented without indicating "8.1":</p> <p>8.4 "The products covered by the provisions of this Standard shall be labelled in accordance with the General Standard for the <i>Labelling of Prepackaged Foods</i> (CXS 1-1985)."</p> <p>This is a sentence that ends in colon and is followed by sub-bullet points, that need to be renumbered accordingly, i.e.: 8.1 Name of product, 8.2 Country of origin, 8.3 Commercial identification (...) etc.</p>
8.2.3	<p>The following amendment needs to be made:</p> <p>8.2.3 Trade name, variety or cultivar shall may be listed on the label.</p> <p>Rationale: as agreed at CCSCH6, see para 129 of REP22/SCH.</p>
Annex I, Table 2	<ul style="list-style-type: none"> - Total Ash %w/w (max): The values of 7 to be replaced by 9 (for consistency with ISO 5562). - We propose to add "on dry basis" to the parameters: Total Ash and Acid Insoluble Ash. This would be consistent with the parameters listed in Table 4 of this draft codex standard and with ISO 5562 - We suggest replacing "Total curcuminoids % (colouring power) on dry basis (min)" with "Curcuminoids content (colouring power) % w/w on dry basis (min)". This would be consistent with the use of the term "content" throughout this draft Codex standard and would also align with ISO 5562.
Annex I, Table 3	<ul style="list-style-type: none"> - As a general comment, the parameters for physical characteristics are not consistent in the different standards (particularly the parameters referring to external contamination).

	<ul style="list-style-type: none"> - The following 5 columns should be deleted and replaced by a generic sentence (for consistency with ISO 5562 and as suggested for other standards): Mould Visible / Insect defiled / infested. % w/w (max); Whole insects, dead (by count) /100 g (max); Live insects (By count) /100 g (max); Mammalian excreta % mg/kg (max); Other Excreta³ % mg/kg, (max). The generic sentence: <u>“Insects (live & dead) and mammalian excreta & hair, visible to the naked eye (corrected if needed) should aim to be zero.”</u> - It should be considered aligning with ISO 5562 and use the term “defective rhizomes” instead of “damaged rhizomes”. In the ISO standard there is a parameter “defective rhizome” (maximum level 5% w/w), accompanied by a definition: “Shrivelled fingers and/or bulbs, internally damaged, hollow or porous rhizomes, rhizomes scorched by boiling and other types of damaged rhizomes shall be considered as defective.” We propose adding this definition to this draft codex standard. - Under Extraneous matter¹ for the whole style it is suggested to indicate 2% max (for consistency with ISO 5562).
Annex II, Table 4	<p>The following should be considered:</p> <ul style="list-style-type: none"> - A method for “damaged rhizomes” (or rather “defective rhizomes” if the name is changed as mentioned above) should be added. - Replace “Colouring power (curcuminoids content)” with <u>“Colouring power (curcuminoids content) on dry basis”</u>. Add ISO 939 in second column. - In case the column “Dead whole insects” remains, it should be added to the table with ISO 927 standard as a method.

India

3.2.2. Classification

India proposes to remove this section from the draft as in Annex I, there is no grading /classification, hence the subclause 3.2.2. (Classification) is redundant.

Table 2 - Chemical Characteristics for Dried or Dehydrated Turmeric

India proposes 9 % for Total ash %w/w (max) for Powdered/Ground style based on India’s surveillance & regulatory data.

Indonesia

1. Section: Style.

Indonesia proposes to add “Sliced” as new style in Turmeric as Dried turmeric generally is also traded in sliced form.

2. Section: Table 2

In relation with 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. This proposal is with consideration to the total curcuminoids amount from dried or dehydrated turmeric generally may exceed 2%.

Indonesia also proposes the value of total ash % (max) to be 9% for all dried or dehydrated turmeric styles. It is in line with ISO 5562-1983 (E) and general condition where total ash content for dried or dehydrated turmeric is around 9%.

Kenya

- **Comment on Title: Standard for Dried Roots, Rhizomes, and Bulbes – Turmeric**

Kenya proposes to add “dried or dehydrated” to the title to read as follows: “STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBES- **DRIED OR DEHYDRATED** TURMERIC”

Justification: To maintain consistency with the standard CXS 343-2021

- **Comment on Product Definition:2.1** Kenya proposes the deletion of the family name in the table with the scientific name to read : *Curcuma longa* L. of Zingiberaceae family

Justification: to align it to other SCH Standards such as CXS 343-021

- **Comment on Table 3, Annex 1. Physical Characteristics of Dried or Dehydrated Turmeric:**

1. Kenya proposes the adoption of 0 as the value on live insects (By count) /100 g (max) for all styles.

Justification: to align it to CXS 343-2021

2. Kenya proposes the adoption of 2 as the value on Other Excreta, % mg/kg, (max)

Justification: to align it to CXS 343-2021

3. Kenya proposes the deletion of percentage (%) for the parameter of Mammalian and Other Excreta, % mg/kg, **(max) to mg/kg, (max)**

Justification: To align the unit of measure to the test method

4. Kenya proposes a unit of 2 on Extraneous matter %w/w (max) on Whole Turmeric and 1 for Ground/Powdered Turmeric.

Justification: To align to EAS 917:2019 to facilitate trade.

Morocco

➤ **Title: “Draft Standard for Dried Roots, Rhizomes, and Bulbs - Turmeric.”**

- **National Position:**

Morocco proposes this modification: "Draft Standard for Dried or Dehydrated Roots, Rhizomes, and Bulbs - Dried or Dehydrated Turmeric."

- **Rationale**

To maintain consistency with the standard: CXS 343-2021 "Standard for Dried Roots, Rhizomes, and Bulbs: Dried or Dehydrated Ginger."

➤ **2.1 Product Definition:**

“Dried or dehydrated turmeric is the product obtained from drying of the rhizomes of plants *Curcuma longa* L. of Zingiberaceae family as described in Table1”.

- **National Position:**

Morocco proposes adding "primary or secondary" to the definition:

"Dried or dehydrated turmeric is the product obtained from the drying of the primary or secondary rhizomes of plants of *Curcuma longa* L. of the Zingiberaceae family, as described in Table 1."

➤ **Le titre :** « Avant-projet de norme pour les racines, les rhizomes et les bulbes séchés – curcuma ».

Position nationale :

Le Maroc propose cette modification « Avant-projet de norme pour les racines, les rhizomes et les bulbes séchés - curcuma **séché ou déshydraté** ».

Argumentaire :

Pour garder la cohérence avec la norme : CXS 343-2021 « norme pour les racines, les rhizomes et les bulbes séchés : Gingembre séché ou déshydraté ».

➤ **2.1 Définition du produit**

« *Le curcuma séché ou déshydraté est le produit obtenu à partir du séchage des rhizomes des plantes de *Curcuma longa* L. de la famille des Zingiberaceae comme décrit dans le tableau 1* ».

Position nationale :

Le Maroc propose d'ajouter « **primaires ou secondaires** » dans la définition :

Le curcuma séché ou déshydraté est le produit obtenu à partir du séchage des rhizomes **primaires ou secondaires** des plantes de *Curcuma longa* L. de la famille des Zingiberaceae comme décrit dans le tableau 1.

Nigeria

Title

Nigeria supports the proposal to rephrase the title and include “dried or dehydrated” to read as follows:

Standard for dried roots, rhizomes and bulbs: **dried or dehydrated** turmeric

8.3.2 Country of harvest

Nigeria proposes the deletion of “Optional” from the provision for Labelling relating Country of Harvest and retention of mandatory.

Rationale

The origin of the product may be different from the Country of Harvest and it is therefore important for traceability.

8.3.3 Region of harvest and year of harvest.

Nigeria proposes the deletion of “Region of harvest” from the Labelling provision.

Rationale

The country origin if declared as required in 8.3.2 is sufficient to reflect the region. While declaration of year of harvest reflects the quality and freshness of the products.

Senegal

Contexte :

La cinquième session du Comité du Codex sur les épices et les herbes culinaires (CCSCH5 (2021)) a convenu de créer un groupe de travail électronique (GTE) présidé par l'Iran et coprésidé par l'Inde, travaillant en anglais, pour élaborer les exigences spécifiques pour le curcuma sur la base du concept de normes de groupe, c'est-à-dire, la catégorie des « Racines, rhizomes et bulbes séchés ».

Le CCSCH6 (2022) a convenu de créer un groupe de travail présidé par l'Iran (République islamique d') et coprésidé par l'Inde, travaillant en anglais, afin de remanier le document en tenant compte des observations soumises au cours de la session.

Il y a eu un consensus général au sein du GTE créé en 2023 sur les modifications rédactionnelles et techniques apportées à l'avant-projet de norme, en particulier sur les sections suivantes : le champ d'application ; la section 2.1 qui a été révisée avec l'ajout de la famille des Zingiberaceae ainsi que d'autres corrections éditoriales ; La section 2.2 a été alignée sur la Norme pour les racines, les rhizomes et les bulbes séchés : Gingembre séché ou déshydraté (CXS 343-2021) car ces produits sont similaires ; Dans la section 2.2, un critère de classement du curcuma basé sur la norme ISO 5562:1983 a été introduit.

Le CCSCH7 est invité à examiner l'avant-projet de norme en vue de le faire progresser vers une étape ultérieure, en notant que les valeurs des tableaux 2 et 3 nécessitent une discussion plus approfondie.

2.1. Définition du produit

Position : Le Sénégal soutient le maintien du tableau 1 relatif au nom commun et nom scientifique.

Tableau 1 : Nom commun et nom scientifique du curcuma séché

Nom commun	Nom scientifique
Curcuma	Curcuma longa L. de la famille des Zingiberaceae

Justification : Ceci permettra l'alignement et la cohérence avec la Norme pour les racines, les rhizomes et les bulbes séchés : Gingembre séché ou déshydraté (CXS 343-2021) comme suggérée par le GTE.

3.2.2 Caractéristiques chimiques et physiques

- Tableau 2. Caractéristiques chimiques pour le curcuma séché ou déshydraté

Produit	Modes de présentation	Teneur en humidité % p/p (max)	Cendres totales %p/p (max)	Cendres insolubles dans l'acide %p/p (max)	Total des curcuminoïdes % (pouvoir colorant) sur base sèche (min)
Curcuma	Entier	12	7	1,5	2
	Écrasé/fissuré/cassé	12	7	1,5	2
	En poudre/moulu	10	7	1,5	2

Position : Le Sénégal soutient les valeurs proposées dans le tableau 2.

Justification : Ces valeurs correspondent à celles utilisées au niveau national.

- Tableau 3. Caractéristiques physiques pour le curcuma séché ou déshydraté

Produit	Mode de présentation	[Rhizomes endommagés % p/p (max)]	Moississure visible /Souillures/infestations d'insectes. % p/p (max)	Insectes entiers, morts (nombre) /100 g (max)	Insectes vivants (nombre) /100 g (max)	Matières externes ¹ %p/p (max)	Corps étranger ² %p/p (max)	Excréments de mammifères % mg/kg (max)	Autres excréments ³ , % mg/kg, (max)
Curcuma	Entier	[5]	[0]	4	[0]	S.O	2	2	[2]
	Écrasé/fissuré/cassé	[S.O]	S.O	4	[0]	S.O	S.O	2	[2]
	En poudre/moulu	[S.O]	S.O	S.O	[0]	S.O	S.O	S.O	S.O

¹ Des matières végétales associées à la plante d'origine du produit, mais non acceptées comme faisant partie du produit final.

² Toute matière étrangère indésirable visible/détectable ou tout autre matériau qui n'est généralement pas associé aux composants naturels de la plante à épices, tels que des bâtons, des cailloux, des fils de sacs en jute, du métal, etc.

³ Excréments d'autres animaux, tels que les reptiles et les oiseaux.

S.O : Sans objet, cela signifie que ce mode de présentation du produit ci-dessus n'a pas été évalué pour cette disposition, et qu'à l'heure actuelle, nous ne disposons pas de valeurs pour celui-ci. S.O ne fait pas référence à zéro.

Commentaire 1 : Le Sénégal juge le tableau 3 incomplet et encourage le GTE à poursuivre les travaux relatifs à la recherche de données concernant les caractéristiques physiques pour le curcuma séché ou déshydraté

Justification : il est important de disposer de toutes ces caractéristiques pour faciliter la commercialisation de ce produit et la protection de la santé du consommateur.

Commentaire 2 : Le Sénégal propose de déplacer les deux tableaux et les mettre dans le corps du texte pour une meilleure lecture.

Justification : Les caractéristiques de qualité définies d'un produit donné font partie intégrante d'une norme de produit.

Thailand

Thailand would like to provide suggestions on this document as follows:

1. For table 2 on Chemical characteristics - we would like to propose to remove the figure of parameter total ash for whole and crushed/cracked/broken styles. This is because other physical characteristics have already been verified and are comply with ISO 5562 standards.

Uganda

Uganda commends the work of the EWG chairpersons and vice chairpersons.

Uganda deliberated on the agenda item and generated the following comments:

1. In table 3, Uganda recommends that the square bracket on “damaged rhizomes”.

Justification:

By identifying the damaged rhizomes, the consumers are able to make informed choices depending on the damages for example: damages caused by cuts, rotting, and scratches during transport, or damages caused by insects.

2. Uganda recommends opening up the square brackets for the “mould visible” for the “whole” turmeric.
3. Uganda recommends that the measuring units for “mammalian Excreta”, % mg/kg, (max) and Other Excreta, % mg/kg, (max) are replaced. Remove mg/kg and replace with %w/w (max).

United Republic of Tanzania

COMMENTS AND JUSTIFICATION

Table 3. Physical Characteristics for Dried or Dehydrated Turmeric

- i. The URT propose extraneous matter limits of 5% m/m max for whole turmeric for control purposes.
- ii. The URT support the proposed damaged rhizomes limits of 5% m/m max to ensure undamaged rhizomes are used since the damage is an effect of poor harvesting. Thus emphasize on Good Agriculture Practices (GAP) will facilitate compliance of the proposed limits.
- iii. The URT support the proposed zero limit for Mould Visible / Insect defiled / infested/ live to ensure the product is safe for human consumption. Normally Insects feed on stored dried turmeric and thus account for serious damage and loss also well dried turmeric is not susceptible to any mould growth/disease problem.
- iv. The URT support the proposed limits of 2 % mg/kg, (max) for Other Excreta in whole and Crushed/Cracked/Broken turmeric due to the nature of weather and environment of producing turmeric.