

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4

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ORIGINAL LANGUAGE ONLY

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES**

**Twenty-third Session
Mexico City, Mexico
25 February - 1 March 2025**

DRAFT STANDARD FOR FRESH CURRY LEAVES

Comments in reply to CL 2024/90-FFV

Argentina, European Union, Indonesia, Malaysia, Saudi Arabia, Senegal, Thailand and USA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/90-FFV issued in December 2024. 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 Fresh Fruits and Vegetables, submits the following comments in response to the CL 2024/90-FFV.</p> <p>The Codex Committee on Fresh Fruits and Vegetables is reminded that Codex standards should reflect existing global trading practices, consumer concerns, and the unique characteristics of the individual FFV being standardized and (iii) should not impose unwarranted restrictions and/or requirements.</p>	USA
<p>Saudi Arabia supports the draft standards for fresh curry leaves and recommends ensuring consistent use of terminology (e.g., "produce," "products," "fresh curry leaves") throughout the text to enhance clarity and improve readability.</p>	Saudi Arabia

SPECIFIC COMMENTS

SCOPE	
<p>The purpose of the standard is to define-specify the quality requirements for fresh curry leaves after preparation and packaging. When applied at stages following packaging, products may show in relation to the requirements of the standard:</p>	Indonesia
<p>L'objectif de la norme est de définir les exigences de qualité des feuilles de curry fraîches après préparation récolte/nettoyage et conditionnement. Lorsqu'ils sont appliqués aux étapes suivant l'emballage, les produits peuvent présenter par rapport aux exigences de la norme :</p> <p>Remplacer "préparation" par récolte/nettoyage</p>	Senegal
<p>Le détenteur/vendeur de produits ne peut pas exposer ces produits ni les proposer à la vente, ni les livrer ou les commercialiser de toute manière autre que conformément à la présente norme. Le titulaire/vendeur est responsable du respect de cette conformité.</p> <p>Réécrire : "Le détenteur/vendeur est tenu de respecter cette conformité." (Cette phrase peut être évitée, car elle est déjà mentionnée plus haut.)</p>	Senegal
DEFINITION OF PRODUCE	
<p>Este estándar aplica a las variedades comerciales de hojas frescas de curry obtenidas de las variedades (cultivars) de Murrayakoenigii Murraya koenigii (L.) Sprengel de la familia Rutaceae, las cuales deben ser suministradas frescas al consumidor después de su lavado y empaquetado adecuado. No aplica a otras formas como deshidratadas, en polvo u hojas secas de curry.</p> <p>Se debe separar el género de la especie en el nombre científico</p>	Argentina
<p>This Standard applies to commercial varieties-varieties[1] of fresh curry leaves obtained from varieties (cultivars) of <i>Murrayakoenigii</i> (L.) Sprengel-Sprengel[2] of Rutaceae-Rutaceae[1] family, which must to be supplied fresh to the consumer after proper cleaning and</p>	European Union

<p>packaging consumer. It does not apply to other forms such as dehydrated, powdered and dried curry leaves. <u>Fresh curry leaves for industrial processing are excluded.</u>[Footnote 1]: Varieties suitable for trade[Footnote 2]: All information on botanical names is taken from the GRIN database (www.ars-grin.gov) or Mansfeld's World Database of Agricultural and Horticultural Crops (http://mansfeld.ipk-gatersleben.de/apex/f?p=185:3:0) or any other suitable database</p> <p>The changes are proposed to align the text with the Standard Layout.</p>	
<p>This Standard applies to commercial varieties of fresh curry leaves obtained from varieties (cultivars) of <i>Murrayakoenigii(L.) Sprengel</i> of Rutaceae family, which must be supplied fresh to the consumer after proper cleaning and packaging. It does not apply to other forms such as dehydrated, powdered and dried curry leaves.</p> <p>Malaysia proposed an editorial amendment for the scientific name of curry leaves from <i>Murrayakoenigii(L.) Sprengel</i> to <i>Murraya koenigii(L.) Sprengel</i>. Accurate scientific names are crucial in Codex international standards to avoid misidentification, ensuring consistency in global markets.</p>	Malaysia
<p>This Standard applies to commercial varieties of fresh curry leaves obtained from varieties (cultivars) of Murrayakoenigii<i>Murraya koenigii(L.) Sprengel</i> of Rutaceae family, which must be supplied fresh to the consumer after proper cleaning and packaging. It does not apply to other forms such as dehydrated, powdered and dried curry leaves.</p> <p>We recommend corrections for the editorial error in the scientific name of <i>Murraya koenigii (L.)</i>.</p>	Thailand
<p>attached to small branches and/or twigs wrapped in bunches<u>which may be bundled</u>;</p> <p>Issue & Rationale: 1st bullet – the existing text states, “Attached to small branches and/or twigs wrapped in bunches”. However, not all branches and twigs of curry leaves are wrapped in bunches. Some are packed loose in containers. Therefore, to reflect both practices the following text is proposed.</p> <p>US Proposal: - The United States recommends amending the text as follows: - Attached to small branches and/or twigs which may be bundled.</p>	USA
PROVISIONS CONCERNING QUALITY	
<p>3.1 MINIMUM REQUIREMENTS</p> <p>Issue & Rationale 1: The sequence of the Minimum Requirements in the draft standard is inconsistent with the standard layout sequence as found in the CCFFV Standard Layout adopted in 2022. A consistent format and sequence facilitate inspection bodies and inspections.</p> <p>US Proposal: - The United States recommends adhering to the sequence in the CCFFV 2022 Standard layout even when omitting those Minimum Requirements that do not apply.</p>	USA
<p>3.1 MINIMUM REQUIREMENTS</p> <p>Saudi Arabia suggests clarifying the criteria for "free of any foreign smell and/or taste" to ensure alignment with international market requirements.</p>	Saudi Arabia

<p>In all classes, subject to the special provisions for each class and the tolerances allowed, the fresh curry leaves must display the following characteristics, deviations from which shall be observed by the naked eye or corrected 20/20 vision^[3] when appropriate:^[3] Loupe, binocular or other magnifying equipment should not be used when assessing defects.</p> <p>The changes are proposed to align the text with the Standard Layout.</p>	European Union
<p>* intact avec tige/tige attachée ;</p> <p>Intact avec tige/pédoncule attaché ; ne doit pas être une obligation.</p>	Senegal
<p>free of abnormal external moisture excluding condensation following removal from cold storage^{free of external moisture};</p> <p>We propose revising the provision to align with the FFV layout as follows: free of abnormal external moisture excluding condensation following removal from cold storage;</p>	Thailand
<p>properly drained,damp but not excessively wet, if washed;</p> <p>Regarding the 4th bullet- the existing text states “properly drained, if washed,” the term “properly drained” can be interpreted as free from all moisture on the leaf surface. Fresh curry leaves are highly perishable. Therefore, freshness and quality must be maintained until it reaches the final consumer. For this reason, water is sprinkled on the fresh curry leaves to maintain/retain organoleptic characteristics (freshness and pungency) when being shipped long distances even by air transport. In instances when fresh curry leaves are washed, they are not completely dried/fully drained, they are left damp. Hence the draft standard text should reflect this practice.</p> <p>US Proposal: - The United States recommends the following amendment</p> <ul style="list-style-type: none"> properly drained, damp but not excessively wet, if washed. 	USA
<p>sound (produce sound; produce affected by rotting or deterioration such as to make it unfit for consumption is excluded^{excluded};</p>	European Union
<p>3.1.1 Minimum maturity requirements</p> <p>Saudi Arabia suggests including specific limits for minimum moisture levels to maintain freshness and reduce the risk of spoilage during transportation and storage.</p>	Saudi Arabia
<p>Fresh curry leaves may be classified in three classes as defined below. Tolerances in respect of quality and size shall be allowed in each lot for produce not satisfying the requirements of the class indicated. When unclassified, the provisions for Class II requirements apply.</p> <p>The removal of the sentence below is suggested given that references to tolerances are mentioned in paragraphs 5.1 and 5.2 for quality and sizing respectively.</p>	European Union
<p>3.2.1 “Extra” Class</p> <p>Saudi Arabia recommends revising the description for the “Extra” Class to ensure clarity and consistency with the other classifications. Specifically, the phrase "very slight superficial defects" lacks a clear quantitative requirement and may lead to inconsistent interpretation. To address this, we propose one of the following options:</p> <ol style="list-style-type: none"> Define a specific quantitative threshold for permissible "very slight superficial defects" (e.g., percentage by weight or count) similar to Class I and Class II. 	Saudi Arabia

<p>2. Alternatively, remove the phrase "very slight superficial defects" and specify that produce in the "Extra" Class must be entirely free from defects to maintain the superior quality standard expected for this category.</p>	
<p>Fresh curry leaves <u>in this class</u> must be of superior quality. They must be characteristic of the variety and/or commercial type. They must be free from defects, with the exception of very slight superficial defects, provided these do not affect the general appearance of the produce, the <u>quality, the keeping</u> quality and presentation in the package.</p> <p>Proposed additions to align with the Standard Layout.</p>	<p>European Union</p>
<p>3.2.2 Class I</p> <p>We understand that consumers require fresh curry leaves that are sufficiently developed to be suitable for consumption. However, in commercial trade, fresh curry leaves with a woody texture may be present. Therefore, we propose adding a provision allowing fresh curry leaves with a woody texture not exceeding 5.0% by weight as follows:</p> <p>"woody not exceeding 5.0% by weight"</p>	<p>Thailand</p>
<p>Fresh curry leaves <u>in this class</u> must be of good quality. They must be characteristic of the variety and/or commercial type. The following slight defects, however, may be allowed, provided these do not affect the general appearance of the produce, the quality, the keeping quality and presentation in the package:</p> <p>Additional tolerances in the individual class requirements that are stricter than the quality tolerances specified under 5.1 should be eliminated. Neither the colour of the leaves nor damaged leaves, such as cracks, bruises, holes or tears or missing or loose stalks/stems affect the edibility and should therefore fall within the 10% tolerance of classes I and II. Stricter tolerances promote food waste. Only for the defect of 'black spots' is reasonable to have a stricter tolerance, as this is a disease of the leaves and thus affects edibility.</p> <p>The proposal is therefore to eliminate the special tolerances except for the tolerance for black spots and to move the special tolerance for black spots from section 3.2.3 class II into section 5.1.3, corresponding to 'Quality tolerance'.</p>	<p>European Union</p>
<p>Daño mínimo en las hojas como rajaduras, hoyos o roturas [que no excedan el 3.0% del peso] y</p> <p>Los defectos y sus % deberían ubicarse en el punto 5. Provisiones relativas a las tolerancias y ,además, para facilitar la evaluación de la mercadería, no superar la tolerancia total admitida para cada categoría. Este comentario corresponde a todos los % tachados en este documento.</p>	<p>Argentina</p>
<p>slightly damaged leaves, such as cracks, holes or tears [not exceeding 3.0% by weight]tears; and</p>	<p>European Union</p>
<p>slightly damaged leaves, such as cracks, holes or tears [not exceeding 3.0% by weightof total surface area; and</p> <p>We propose setting the defect value based on the total surface area. If the defect value is determined by weight, larger curry leaves will weigh more than smaller ones, even if the defect size is the same</p>	<p>Thailand</p>
<p>Pequeños defectos en coloración [que no excedan el 5.0% del peso]</p>	<p>Argentina</p>

slight defects in colouring [not exceeding 5.0% by weight]	European Union
slight defects in colouring [not exceeding 5.0% by weight of total surface area. We propose setting the defect value based on the total surface area. If the defect value is determined by weight, larger curry leaves will weigh more than smaller ones, even if the defect size is the same	Thailand
3.2.2 3 _____ Class II	European Union
3.2.2 Class II We understand that consumers require fresh curry leaves that are sufficiently developed to be suitable for consumption. However, in commercial trade, fresh curry leaves with a woody texture may be present. Therefore, we propose adding a provision allowing fresh curry leaves with a woody texture not exceeding 5.0% by weight as follows: “woody not exceeding 5.0% by weight”	Thailand
This <u>class</u> includes fresh curry leaves that do not qualify for inclusion in higher grades classes but satisfy the minimum requirements specified in Section 3.1 above. The following defects may be allowed, provided the fresh curry leaves retain their essential characteristics as regards the quality, the keeping quality and presentation:	European Union
Hojas dañadas como rajaduras, hoyos o roturas [que no excedan el 5.0% del peso]	Argentina
damaged leaves, such as cracks, bruises, holes or tears [not exceeding 5.0% by weight];	European Union
damaged leaves, such as cracks, bruises, holes or tears [not exceeding 5.0% by weight of total surface area; We propose setting the defect value based on the total surface area. If the defect value is determined by weight, larger curry leaves will weigh more than smaller ones, even if the defect size is the same	Thailand
Defectos en la coloración [que no excedan el 5.0% del peso]	Argentina
defects in colouring [not exceeding 5.0% by weight];	European Union
defects in colouring [not exceeding 5.0% by weight of total surface area; We propose setting the defect value based on the total surface area. If the defect value is determined by weight, larger curry leaves will weigh more than smaller ones, even if the defect size is the same	Thailand
Pequeñas manchas negras [que no excedan el .0% del peso] y	Argentina
slight black spots [not exceeding 2.0% by weight]; and	European Union

<p>slight black slight spots [not from physical damages not exceeding 2.0% by weight] of total surface area; and</p> <p>Black spots may be caused by fungal or bacterial damage, which is not allowed as according to bullet 8 (free from pests and damage caused by pests) of Section 3.1. To clarification, we propose revising the text as follows: "slight spots from physical damages not exceeding 2.0% of total surface area; and"</p>	Thailand
<p>Tallos faltantes o sueltos [que no excedan el 1.0% del peso]</p>	Argentina
<p>missing or loose stalks/stems [not exceeding 1.0% by weight].</p>	European Union
<p>* tiges/tiges manquantes ou détachées [ne dépassant pas 1,0 % en poids].</p> <p>Cette puce doit être élidée en lien avec cette partie [définition du produit] dans le même projet de norme : sous forme de feuilles individuelles en vrac dans des conteneurs.</p>	Senegal
PROVISIONS CONCERNING TOLERANCES	
<p>The United States recommends that added consideration be given to the product characteristics setting the tolerances for fresh curry leaves. Curry leaves are small (average. 2-4 cm in length and 1-2 cm in width). 100 fresh leaves with rachis weigh between 181.24g to 290.54g . i.e., 100 leaves =Avg. 236g. (Study of Morphological Variability in Curry Leaf (Murraya koenigii L.) Germplasm of Southern Rajasthan AS Rathore, KD Ameta, RA Kaushik, Devendra Jain, Roshan Choudhary, HL Bairwa, Om Prakash, Pavan Prajapati, Rajat Singh and Monu Kumari; The Pharma Innovation Journal 2023; 12(8): 1074-1076).</p> <p>Therefore, the customary tolerances by weight or count for fresh fruits and vegetables (FFV) of 5.0% in Extra Class, 10.0% in Classes I and II when applied to fresh curry leaves may yield a high number of leaves that would detract from the appearance of the lot.</p>	USA
<p>5% by weight or count of fresh curry leaves not satisfying the requirements for of the <u>class grade</u>, but meeting the requirements for those of Class I grade is allowed.</p>	European Union
<p>10% by weight or counts of fresh curry leaves not satisfying the requirements for of the <u>class grade</u>, but meeting the requirements for those of Class II grade is allowed.</p>	European Union
<p>10% by weight or count of fresh curry leaves not satisfying the requirements of the Class II is allowed II. <u>With regards to black spots, not exceeding 2% by weight.</u></p>	European Union
<p>The fresh curry leaves shall be uniform in the same package i.e., having a difference in length of [not more than fresh curry leaves within a package shall not [exceed 30 mm].</p> <p>Suggestion to delete any reference to uniformity, as this is mentioned in section 6.1 referring to 'uniformity'</p>	European Union

PROVISIONS CONCERNING PRESENTATION	
<p>The contents of each package must be uniform and contain fresh curry leaves of the same origin, variety or commercial type, quality, colour and size. The visible part of the contents of the package must be representative of the entire contents. <u>However, a mixture of fresh curry leaves of distinctly different varieties or commercial types may be packed together in a package, provided they are uniform in quality and, for each variety or commercial type concerned, in origin.</u></p> <p>Section 7.1.2 “Origin of Produce” describes the origin for mixtures. Therefore, this section 6.1 should already establish that mixtures are generally permitted. It is therefore proposed the addition of the sentence below.</p>	European Union
<p>Le contenu de chaque colis doit être homogène et contenir des feuilles de curry fraîches de même origine, variété ou type commercial, qualité, couleur et calibre. La partie visible du contenu du colis doit être représentative de l'ensemble du contenu.</p> <p>Remarque : La notion d’avoir le même calibre des feuilles dans un même contenant peut être contraignant, car nous parlons de feuilles qui, selon leur disposition sur une même plante, n’ont pas le même calibre. Nous suggérons donc de laisser uniquement les notions de même lot, même qualité et même couleur, entre autres, et d’enlever le mot calibre.</p>	Senegal
<p>Fresh curry leaves may shall be packed in each container in compliance with the <i>Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables</i> (CXC 44-1995).</p> <p>To align the text with the Standard Layout</p>	European Union
PROVISIONS CONCERNING MARKING OR LABELLING	
<p>If the produce is not visible from the outside, each <u>Each</u> package shall be labelled as “Fresh Curry Leaves” <u>to the name of the produce and may be labelled as to name of the variety.</u>².</p> <p>The labelling with the name of the produce shall be mandatory for all consumer packages in alignment with the Standard Layout, regardless of the visibility of the product.</p>	European Union
<p>Si le produit n'est pas visible de l'extérieur, chaque emballage doit être étiqueté « Feuilles de curry fraîches ».</p> <p>Remarque : Nous suggérons d’indiquer sur l’étiquette « Feuilles de curry fraîches », même si le produit est visible de l’extérieur.</p>	Senegal
<p>Country of origin <u>origin</u>^[6] and optionally, district where grown or national, regional or local place name-. <u>In the case of a mixture of distinctly different varieties or commercial types of curry leaves of different origins, the indication of each country of origin shall appear next to the name of the varieties or commercial types concerned. [6] The full or commonly used name should be indicated</u></p> <p>Text added to be consistent with the Standard Layout.</p>	European Union
<p>The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods</i> (CXS 346-2021), <u>in addition the following requirements shall apply: Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside. 7.2.1 Origin of the produce Country of origin⁶ and, optionally, district where grown, or national, regional, or local place name. In the case of a mixture of distinctly different commercial types of curry leaves of different origins, the indication of each country of origin shall appear next to the name of the commercial types concerned. 7.2.2 Commercial specifications · class; · variety and/or commercial type (optional); and · size (if sized) 7.2.3 Official control mark (optional)</u></p> <p>Text added to be consistent with the Standard Layout.</p>	European Union

The labelling of non-retail containers should be in accordance with the *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021). In addition, the following specific requirements shall apply: Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside.

We propose revising the provision to align with the FFV layout as follows:

“The labelling of non-retail containers should be in accordance with the *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021). In addition, the following specific requirements shall apply:

Each package must bear the following particulars, in letters grouped on the same side, legibly and indelibly marked, and visible from the outside.”

Thailand