

# CODEx ALIMENTARIUS COMMISSION



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Agenda Item 6.1

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

### Eighth Session

### DRAFT STANDARD FOR DRIED HERBS REQUIREMENTS FOR SWEET MARJORAM

(Comments of the European Union, Ghana, Thailand)

#### The European Union

#### Mixed Competence

#### Member States Vote

The European Union and its Member States (EUMS) would like to thank Egypt for updating the draft **Standard for herb— requirements for sweet marjoram**.

The EUMS would like to submit the following comments:

#### General comments

It should be considered using a consistent terminology throughout the document, especially in comparison with other Codex standards, where possible.

It should also be considered whether the “dehydrated” form of marjoram is covered by this standard and should be corrected accordingly throughout the entire text.

Rationale: Similar codex standards (oregano and thyme) specify only “dried” form and the ISO 10620 on “Dried sweet marjoram (*Origanum majorana* L.)” defines “dried sweet marjoram”. Furthermore, the project document refers to “dried sweet marjoram”.

#### Specific comments on the paragraphs and Annex

For background information, please refer to CX/SCH 25/8/7.

### DRAFT STANDARD FOR DRIED SWEET MARJORAM

(At Step 3/4)

#### 1. SCOPE

This standard applies to dried culinary herbs, as defined in Section 2.1 below offered for direct human consumption, commercial food processing or for repackaging if required. It excludes the product for industrial processing.

#### 2. DESCRIPTION

##### 2.1 Product definition

Dried sweet marjoram is a product obtained from the plant *Origanum majorana* L. Lamiaceae family as described in Table 1.

Table 1. Common, trade and scientific name of dried sweet marjoram

| Common name | Trade name(s)   | Scientific name   |
|-------------|---|---|
| Marjoram    | Sweet marjoram<br>Knotted marjoram<br>Garden marjoram | <i>Origanum majorana</i> L<br><b>Synonyms:</b> <i>Majorana hortensis</i> Moench |

## 2.2 Styles

The EUMS would like to note that style b) "crushed/rubbed/flaked: the whole plant including flowers ..." may suggest that roots are included, whereas a) clearly specifies "whole dry plant without the root". This inconsistency may create uncertainty. Furthermore, ISO 10620 defines rubbed marjoram as consisting only of dry leaves and flowers, excluding stems and roots. To avoid misinterpretation and ensure alignment with ISO 10620, b) should be revised accordingly.

The EUMS propose modifying style c): "ground/powdered: dry leaves with or without a small proportion of the flowering tops **processed into a powder.**"

### Rationale:

This addition would complete the definition and ensure consistency with other Codex standards, such as CXS 342-2021 for dried oregano.

Dried sweet marjoram may be:

- a. whole/Intact (bunches /bouquets): the whole dry plant without the root.
- b. crushed/rubbed/flaked: the whole plant including flowers processed to varying degrees, ranging from a coarse to a fine crush.
- c. ground/powdered: dry leaves with or without a small proportion of the flowering tops.

The particle size of ground/powdered styles is determined by contractual agreement between buyer and seller.

Other styles distinctly different from the above three are allowed, provided they are labelled accordingly.

## 2.3 Sizing (optional)

## 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

### 3.1 Composition

Dried sweet marjoram as defined in Section 2 above, shall conform to the requirements contained in Annex I.

### 3.2 Quality factors

#### 3.2.1 *General*

Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live insects.

#### 3.2.2 *Odour, flavour and colour*

Dried sweet marjoram as indicated in Section 2.1 shall have a characteristic odour and flavour which can vary depending on geo-climatic factors/conditions, varieties and the main chemical components of the volatile oil indicated in Annex I, Table A1: Chemical characteristics. It shall be free from any foreign odour, flavour especially from rancidity and mustiness. The colour shall vary from "green to greyish" depending on the origin of the plant.

#### 3.2.3 *Chemical and physical characteristics*

Dried sweet marjoram shall comply with the chemical and physical characteristics specified in Annex I (Table A1 Chemical characteristics and Table A2 Physical characteristics).

The defects allowed must not affect the general appearance of the product as regards its quality, keeping quality and presentation in the package.

#### 3.2.4 *Classification (optional)*

When dried sweet marjoram as described in Section 2.1 is traded as classified/graded, the provisions in Annex I shall apply as minimum requirements.

## 4. FOOD ADDITIVES

Anticaking agents listed in Table 3 of the *General standard for food additives* (CXS 192-1995) are acceptable for use in ground/powdered form of the product

## 5. CONTAMINANTS

The products covered by this standard, shall comply with the maximum levels specified in the *General*

*standard for contaminants and toxins in food and feed* (CXS193-1995), and shall be produced in accordance with *the Code of practice for weed control to prevent and reduce pyrrolizidine alkaloid contamination in food and feed* (CXC74-2014) and other relevant Codex Alimentarius texts.

The products covered by this standard shall comply with the maximum residue limits for pesticides established by the Codex Alimentarius Commission.

## 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 *General principles of food hygiene* (CXC1-1969), the *Code of hygienic practice for low-moisture foods* (CXC 75-2015) Annex III on spices and dried culinary herbs, and other relevant Codex Alimentarius texts.

The products should comply with any microbiological criteria established in accordance with the *Principles and guidelines for the establishment and application of microbiological criteria related to foods* (CXG21- 1997).

## 7. WEIGHTS AND MEASURES

Containers shall be as full as practicable without impairment of quality and shall be consistent with a proper declaration of contents for the product.

## 8. LABELLING

The products covered by the provisions of this standard shall be labelled in accordance with the *General standard for the labelling of pre-packaged foods* (CXS1-1985). In addition, the following specific provisions apply:

### 8.1 Name of the product

#### 8.1.1 The common name of the product shall be as described in Section 2.1.

The EUMS suggest that either "the common name" should be specified on 8.1.1 or the whole sentence is removed.

"8.1.1 The name of the product shall be the 'common name', as described in Section 2.1.

#### Rationale:

Paragraph 8.1.1 is not clear as is.

According to the Codex General Standard on the Labelling of Prepackaged Foods (GSLPF), the indication of the name of the food/product is mandatory and this section is in addition to the GSLPF. The sentence would therefore be redundant

If the sentence is kept, does this mean that the common name referred to in table 1 shall be name of the product? If yes, this should be specified here.

#### 8.1.2 The name of the product shall include an indication of the style as described in Section 2.2

#### 8.1.3 Trade name, variety or cultivar may be listed on the label.

The EUMS have the following comments for 8.1.3:

Suggested sentence: **"The trade name or the scientific name may be indicated"**.

#### Rationale:

"Listed" seems not to be the most appropriate word and could be replaced by "indicated" to make the sentence read better.

Other sections like in 8.2.1 do not mention «on the label». Why should it be specified here? In addition, it seems to be redundant as we are under the labelling section.

The terms used here e.g. variety or cultivar are not mentioned on table 1 of Section 2.1. To prevent confusion and misunderstandings, the terminology should be consistent throughout the standard.

## 8.2 Country of origin and country of harvest.

### 8.2.1 Country of origin shall be declared.

The EUMS suggest the following wording for 8.2.1:

**"The country of origin shall be indicated"**

Rationale:

"Declared" seems not to be the most appropriate word and could be replaced by "indicated" to make the sentence read better.

### 8.2.2 Country of harvest may be declared (optional).

The EUMS suggest the following wording:

8.2.2 Country of harvest (optional).

### 8.2.3 Region of harvest and year of harvest may be declared (optional).

The EUMS suggest the following wording:

8.2.3 Region of harvest and year of harvest (optional).

Rationale: to be consistent with the 2 latest standards adopted (turmeric and all spices)

## 8.3 Commercial identification

- Style
- Class/grade, if applicable.
- Particle size (optional).

## 8.4 Net weight

## 8.5 Labelling of non-retail containers

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).

## 9. METHODS OF ANALYSIS AND SAMPLING

### 9.1 Methods of analysis

The methods of analysis as described in Table 2: Methods of Analysis below, will be included in CXS 234-1999 after endorsement by CCMAS and the following text will replace the table.

"For checking the compliance with this standard, the methods of analysis and sampling contained in the *Recommended methods of analysis and sampling* (CXS 234-1999) relevant to the provisions in this standard, shall be used."

Table 2. Methods of analysis

The EUMS suggest the amendments as per the track changes in the table below:

| Provision  | Method*   | Principle  | Type**       |
|--|---|--|--------------|
| Moisture   | ISO 939   | Distillation   | I            |
| Volatile Oil <u>on dry basis</u>                   | ISO 939 and ISO 6571  | <u>Calculation from moisture and volatile oils,</u><br><u>Distillation followed by volumetric method and</u>                       | II           |
| Total Ash <u>on dry basis</u>                      | ISO 939 and ISO 928   | <u>Calculation from moisture and ash (at 550 °C),</u><br><u>Distillation and volumetric method</u><br><u>gravimetry</u>            | II           |
| Acid Insoluble Ash <u>on dry basis</u>             | <u>ISO 939 and ISO 930</u><br><u>AOAC 941.12-B</u>  | <u>Calculation from moisture and ash (at 550 °C),</u><br><u>Distillation and gravimetric methods</u><br><u>Gravimetric Methods</u> | II           |
| Extraneous Matter                                  | ISO 927   | Visual Examination followed by <u>gravimetric method</u>   | I            |
| Foreign Matter                                     | ISO 927   | Visual Examination followed by <u>gravimetric method</u>   | I            |
| Insect fragments, whole dead insects, live insects | ISO 927   | Visual examination followed by <u>gravimetric method (counting)</u>  | I            |
| Insects damage/defiled/infested                    | ISO 927   | Visual Examination followed by gravimetric method  | I            |
| Mammalian or/and other excreta                     | <u>Method V-8 Spices, Condiments, Flavors and Crude Drugs A. General methods for spices, herbs and botanicals (V 32)</u><br><u>(<a href="https://www.fda.gov/food/laboratory-methods-food/mpm-v-8-spices-condiments-flavors-and-crude-drugs#v32">https://www.fda.gov/food/laboratory-methods-food/mpm-v-8-spices-condiments-flavors-and-crude-drugs#v32</a>)</u><br><br><u>Macro-analytical Procedures Manual (MPM)</u><br><br><u>A. General Method for Spices, Herbs, and Botanicals</u><br><br><u>Version 2 – January 2025</u><br><br><u>CPG Sec. 525.900 Whole Plant</u> | Visual examination followed by <u>Gravimetric method</u>   | IV           |
| Mould visible                                      | <u>ISO 927</u><br><u>Macro-analytical Procedures Manual (MPM)</u><br><br><u>A. General Method for Spices, Herbs, and Botanicals</u><br><br><u>Version 2 – January 2025</u>  | Visual Examination followed by <u>Gravimetric method</u>   | I<br>IV<br>† |
| Rodent filth                                       | AOAC 975.49 and<br><u>AOAC 985.30</u>   | Flotation  | I            |

The EUMS would like to note, that for the provision "Rodent filth", the AOAC 975.49 method is for light filth in spices and condiments; and the AOAC 985.39 method is for light filth in unground marjoram.

Notes:

\* Latest edition or version of the approved method should be used

\*\* According to the definition of "types of method of analysis" as per Codex Procedural Manual Section II

## **9.2 Sampling plan**

To be developed.

**Table A1: Chemical characteristics for dried sweet marjoram**

The EUMS suggest the following:

- The requirement for acid insoluble ash on dry basis is set too high, it should be 3, thus the 4.5 should be kept in square brackets until adequate data are submitted.
- Total ash is set too high, it should be 12, thus the 16 should be kept in square brackets until adequate data are submitted.
- Moisture content for “ground/powdered” form should be 12 % w/w.
- The footnote to volatile oils should provide examples of the heat treatments and processes concerned, if possible.

| Product name    | Style                 | Moisture content % w/w (max.) | Total ash, on dry basis % w/w (max.) | Acid insoluble ash on dry basis % w/w (max.) | Volatile oils* ml/100g on dry basis (min.) |
|-----------------|-----------------------|-------------------------------|--------------------------------------|--|--|
| <b>Marjoram</b> | Whole                 | 12                            | [16] [12]                            | [4.5] [3]                                    | 0.3  |
|                 | Crushed/rubbed/flaked | 12                            | [16] [12]                            | [4.5] [3]                                    | 0.7  |
|                 | Ground/powdered       | [12]<br>[10]                  | [16] [12]<br>[15]                    | [4.5] [3]<br>[4]                             | [0.6]                                      |

Note: \*Volatile oils values are related to natural SCH. It does not apply to SCH that are heat treated or subjected to other processes which may reduce the natural content of volatile oil.

**Table [A2]: Physical characteristics for dried sweet marjoram**

The EUMS suggest the following:

- “Extraneous matter” for the “crushed/rubbed/flaked” form should be 1 % w/w max.
- “Foreign matter” should be 0.1 for both styles, to be in line with a codex standard for oregano (a similar spice).
- “Mould” for “whole” style should be 0, as ISO 10620 contains the following provision: “dried sweet marjoram shall be free from mould [...]”, this will make the two standards are comparable.
- Dead whole insects should be 1 /100g (max)
- “Insect damage” should be 5 %w/w (max)
- The “Insect fragments” column to be removed, so it is aligned with the oregano standard and to avoid the high figure of 250.
- “Mammalian excreta” should be as low as possible, 1 mg/kg (max.).

- The max. 10 mg/kg for “other excreta” seems to be too high, compared to a similar standard such as dried basil, where it is 4.4 mg/kg. We suggest the same level: 4.4 mg/kg.
- The necessity of including “Rodent filth” in the table may be reconsidered, since other standards for similar herbs (e.g., oregano, basil) do not include this parameter. Removing it would align the table with common practice. In case the “Rodent filth” remains, the value should be 1 per 25 g for “Whole” and N/A for “Crushed/Rubbed/Flaked”.

In addition, the EUMS suggest aligning the values for whole and crushed/rubbed/flaked forms for all parameters, following the approach applied in the Codex standard for oregano (CXS 342-2021).

Since requirements are provided separately for whole and ground forms, the expressions “whole only” and “ground only” in the table headers for “Insect damage” and “Insect fragments” are unnecessary.

Regarding the parameter “Insect fragments count/10 g (max),” the EUMS would like a clarification whether the 10 g unit was intentional. In general practice, “count/100 g” is typically used (for live insects). The proposed 250 pieces at 10 g seems to be a significant amount considering that the indicated method for insect fragments is a visual examination).

| Product name | Style                 | Extraneous matter %w/w (max) <sup>1</sup> | Foreign matter % w/w (max) <sup>2</sup> | Mould % w/w (max) | Dead whole insects count/100 g (max) | Insect damage % w/w (max) whole only | Insect fragments count/10 g (max) (ground only) | Live insects <u>count/100 g (max)</u> | Mammalian excreta mg/kg (max) | Other Excreta mg/kg (max) <sup>3</sup> | Rodent filth count/25 g/ [10 g] | Other Factors |
|--------------|-----------------------|---|---|-------------------|--------------------------------------|--------------------------------------|---|---------------------------------------|-------------------------------|--|---------------------------------|---------------|
| Marjoram     | Whole                 | 1   | 1 [0.1]                                 | 1 [0]             | 3                                    | [5]<br>[1]                           | NA [250]  | 0                                     | 1<br>[2.2]                    | 10<br>[22] [4.4]                       | [2]                             |               |
|              | Crushed/Rubbed/Flaked | 1<br>[2]                                  | 3 [0.1]<br>[NA]                         | NA [0]            | 3 [1/25g]                            |                                      | NA  | 0                                     | 1                             | [4.4]                                  | NA                              |               |
|              | Ground/powdered       | NA*                                       | NA                                      | NA                | NA                                   | NA                                   | NA  | 0                                     | NA                            | NA                                     | NA                              |               |

**Notes:**

<sup>1</sup> Vegetative matter associated with the plant from which the product originates but not accepted as part of the final product. In rubbed marjoram, the proportion of stalks and other parts, excluding flower tops, whose dimensions exceed 10 mm in length or 1 mm in diameter shall not be more than 1 % (m/m).

<sup>2</sup>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.

<sup>3</sup> Excreta from other animals such as reptiles and birds.

[NA: Not applicable, means that the style of the above product has not been evaluated for this provision, and currently does not have value. N/A does not refer to zero.



**Ghana****8.4 Net weight**

Ghana proposes that the net weight should be declared.

**Rationale:**

Consumers should know the weight of product being purchased.

**Chemical characteristics for dried sweet marjoram / Physical characteristics for dried sweet marjoram**

Ghana does not support Table A1 and A2 as proposed. We recommend extensive discussions by the committee for consensus on the values that will ensure safety for consumers.

**Thailand**

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

**1. Annex 1 Table A2: Physical characteristics**

We would like to provide the observation that the proposed value of insect fragments for whole-style sweet marjoram products at 250 counts per 10-gram sample is excessive. Appropriate and acceptable values for consumer safety should be considered. Additionally, the insect fragment parameter title in this table should be checked for the correction of the term "(ground only)."