

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 6.1

CX/SCH 25/8/7 Add.1

ORIGINAL LANGUAGE ONLY

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

Eighth Session

Guwahati, Assam, India

13–17 October 2025

DRAFT STANDARD FOR DRIED SWEET MARJORAM

(At Step 3)

Comments in reply to CL 2025/55-SCH

Submitted by:

*Brazil, Canada, Egypt, European Union, India, Iraq, Kenya, Mexico, Peru,
Senegal, Thailand, United Arab Emirates, United States of America (USA)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/55-SCH¹ issued in July 2025. 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 annexed and presented in a tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCNE>

ANNEX

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>It should be considered using a consistent terminology throughout the document, especially in comparison with other Codex standards, where possible.</p> <p>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.</p> <p>Rational: Similar codex standards (oregano and thyme) specify only “dried” form and the ISO 10620 on “Dried sweet marjoram (<i>Origanum majorana</i> L.)” defines “dried sweet marjoram”. Furthermore, the project document refers to “dried sweet marjoram”.</p>	European Union
<p>Canada appreciates the opportunity to review and provide comments on the Proposed Draft Standard for Dried Sweet Marjoram. Canada strongly supports the consistent application of the Codex standard template and adherence to the overarching codes, manuals, and standards such as the GSLPF (CXS 1-1985), as well as other relevant Codex Alimentarius texts. Deviations should only be made when absolutely necessary and must be backed by sound scientific evidence and data-informed rationale. This approach ensures clarity, consistency, and avoids delays in the adoption and progress of the standard.</p>	Canada
<p>Regarding the text placed in square bracket we agree with the EWG chair's recommendations for all the points, with the following remaining suggestions:</p> <ul style="list-style-type: none"> • Along the text to use the common name “Marjoram” instead of one of the trade names (dried sweet marjoram) • In the “Table A1: Chemical characteristics” preference for the value of 3,5% in the column of “Acid insoluble ash on dry basis % w/w (max.)”: it reflects the national regulations • In the “Table A2 Physical characteristics”, preference for the value of 0,1% in the column of “Foreign matter % w/w (max.)”: aligned with dried oregano standard • In the “Table A2 Physical characteristics” preference for the value of 0 (zero) in the column of “mammalian excreta” and “other excreta”: aligned with the national regulation 	Brazil
<p>La Comisión Técnica Nacional sobre Especies y Hierbas Culinarias de Perú recomienda CONTINUAR con el trámite.</p>	Peru
<p>México está de acuerdo con avanzar el documento a su siguiente etapa.</p>	Mexico
<p>Egypt agrees on the draft</p>	Egypt
<p>The United States of America submits the following comments in support of the activities of the Codex Committee on Spices and Culinary Herbs. We adhere to the principles that Codex standards must reflect trade practices and offer consumer protection; however, they should not include provisions that are not defined in international trade rules, tedious to apply and when applied conformity assessment bodies to legal risk.</p>	USA
<p>agree with DRAFT STANDARD FOR DRIED SWEET MARJORAM</p>	Iraq

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
1. SCOPE	
This standard applies to dried culinary herb <u>sweet marjoram</u> , as defined in Section 2.1 below <u>below</u> , offered for direct human consumption, commercial as an ingredient in food processing or for repackaging if required. It excludes the product. This standard does not apply to sweet marjoram when intended for industrial processing.	Thailand
2. DESCRIPTION	
2.1 Product definition	
Dried sweet marjoram is a product obtained-prepared from the plant of <i>Origanum majorana</i> L. of Lamiaceae family as described in Table 1.	Thailand
Table 1. Common, trade and scientific name of dried sweet marjoram<u>Sweet marjoram covered by this standard</u>	Thailand
Marjoram <u>Marjoram or Sweet marjoram</u> The common name should also be consistent with the name of the standard. So, the name "Sweet majoram" should be added.	Thailand
<i>Origanum majorana</i> L.	Thailand
2.2 Styles	
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." Rational: This addition would complete the definition and ensure consistency with other Codex standards, such as CXS 342-2021 for dried oregano.	European Union
Styles To delete the following statement mentioned under the subtitle, 2.2 tyles (The particle size of ground/powdered styles is determined by contractual agreement between buyer and seller), and replace it by create a table contain several possible particle size of ground/powdered styles	United Arab Emirates
ground/powdered: dry leaves with or without a small proportion of the flowering topst <u>tops processed into a powder</u> .	European Union
Other styles distinctly different from the above those three are allowed, provided they are labeled accordingly.	Thailand
ESSENTIAL COMPOSITION AND QUALITY FACTORS	
3.2.1 General	
3.2.1 General To replace the following statement mentioned under the subtitle: 3.2.1 General (Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live insects). To be (Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live and dead insects and their parts)	United Arab Emirates
3.2.1 <u>General</u>	Thailand
Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live insects <u>insects and practically free from extraneous and foreign matter</u> . The EUMS suggest extending the sentence as follows: "Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live insects and practically free from extraneous and foreign matter." Rational: To be consistent with previous standards	European Union

COMMENT	MEMBER / OBSERVER
<p>Dried sweet marjoram shall be safe and suitable for human consumption. It shall be free from live insects.</p> <p>This section should be removed because it follows the instructions of the SCH standard template.</p>	Thailand
3.2.4 Classification	
<p>3.2.4 Classification (optional)</p> <p>India Proposes to remove the section 3.2.4</p> <p>Rationale: Since there is no classification of Grades/class in the Annex-1 (Table-A1: Chemical characteristics for dried sweet marjoram and Table-A2: Physical characteristics for dried sweet marjoram), section 3.2.3 may be removed.</p> <p>Example:</p> <ol style="list-style-type: none"> Standards for Black, White and Green peppers (CXS 326-2017) where Grade/Class mentioned hence classification is mentioned in the standard Standard for dried roots, rhizomes and bulbs: Dried or dehydrated ginger (CXS 343-2021) where section 3.2.3 is not mentioned, hence classification is not mentioned in the standard 	India
4. FOOD ADDITIVES	
<p>Anticaking agents listed in Table 3 of the <i>General standard for food additives</i> (CXS 192-1995) are acceptable for use <u>only</u> in ground/powdered form of the product</p> <p>India Proposes to include the term "Only"</p> <p>Rationale: The word "Only" needs to be included to differentiate from other styles</p>	India
5. CONTAMINANTS	
<p>Kenya proposes inclusion of guidance on pyrrolizidine alkaloid prevention in Dried Sweet Marjoram .</p> <p>Kenya supports alignment with existing Codex standards on contaminants, toxins, pesticide MRLs, and hygiene codes.</p>	Kenya
8. LABELLING	
8.1 Name of the product	
<p>8.1.1 The common-name of the product shall be <u>the 'common name'</u>, as described in Section 2.1.</p> <p>The EUMS suggest that either "the common name" should be specified on 8.1.1 or the whole sentence is removed.</p> <p>"8.1.1 The name of the product shall be the 'common name', as described in Section 2.1.</p> <p>Rationale:</p> <p>Paragraph 8.1.1 is not clear as is.</p> <p>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</p> <p>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.</p>	European Union
<p>8.1.2 The name of the product <u>shall may</u> include an indication of the style as described in Section 2.2</p> <p>Canada supports the use of word "may" instead of "shall" in this provision.</p> <p>Rationale:</p> <p>Better alignment and consistency with other SCH standards. The GSLPF already requires the name of the food to indicate its true nature.</p>	Canada

COMMENT	MEMBER / OBSERVER
<p>8.1.3 The Trade name, variety name or cultivar scientific name may be listed on the labelindicated.</p> <p>The EUMS have the following comments for 8.1.3:</p> <p>Suggested sentence: "The trade name or the scientific name may be indicated". This would also be consistent with the draft standard for cinnamon.</p> <p>Rationale:</p> <p>"Listed" seems not to be the most appropriate word and could be replaced by "indicated" to make the sentence read better.</p> <p>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.</p> <p>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.</p>	European Union
8.2 Country of origin and country of harvest	
<p>8.2.1 The cCountry-ountry of origin shall be declaredindicated.</p> <p>The EUMS suggest the following wording for 8.2.1:</p> <p>"The country of origin shall be indicated"</p> <p>Rationale:</p> <p>"Declared" seems not to be the most appropriate word and could be replaced by "indicated" to make the sentence read better.</p>	European Union
<p>8.2.2 Country of harvest may be declared (optional).</p> <p>The EUMS suggest the following wording:</p> <p>8.2.2 Country of harvest (optional).</p>	European Union
<p>8.2.3 Region of harvest and year of harvest may be declared (optional).</p> <p>The EUMS suggest the following wording:</p> <p>8.2.3 Region of harvest and year of harvest (optional).</p> <p>Rational: to be consistent with the 2 latest standards adopted (turmeric and all spices)</p>	European Union
8.4 Net Weight	
<p>8.4 Net-weight</p> <p>Canada recommends removal of section 8.4</p> <p>Rationale:</p> <p>Canada recommends the removal of Section 8.4, as it does not align with the standard Codex template and is not included in the labelling sections of other spice standards—either finalized or currently under development.</p> <p>Including this provision introduces unnecessary duplication and potential confusion. Section 7 already addresses product declarations, and Section 8 clearly states that labelling shall follow the General Standard for the Labelling of Prepackaged Foods (GSLPF) – CXS 1-1985. Under Section 4.3 of the GSLPF, the declaration of net contents is already a mandatory requirement.</p>	Canada
9. METHODS OF ANALYSIS AND SAMPLING	
<p>Table 2. Methods of analysis</p> <p>Currently, the "Type" for the "Volatile Oil", "Total Ash", and "Acid Insoluble Ash" rows is all indicated as Type "II".</p> <p>The United States recommends that they all be changed to Type "I". The United States also has the following comment: Any complementary method that uses a Type I will make the combination Type I. So if ISO 939 is used, then the result is Type I.</p>	USA
Table 2. Methods of analysis	

COMMENT	MEMBER / OBSERVER
<p>The EUMS suggest the following amendments:</p> <ul style="list-style-type: none"> - for "Volatile oil (on dry basis)" the Principle should be: "Calculation from moisture and volatile oils, Distillation and distillation" and the Type should be "I" - for "Total ash (on dry basis)" the Principle should be: "Calculation from moisture and ash (at 550 °C), Distillation and gravimetry" and the Type should be "I" - for "Acid insoluble ash (on dry basis)" the Method should be "ISO 939 and ISO 930" and the Principle: "Calculation from moisture and ash (at 550 °C), Distillation and gravimetry" and the Type should be "I" - for "Extraneous matter" the Principle should be: "Visual examination followed by Gravimetry" - for "Foreign matter" the Principle should be: "Visual examination followed by Gravimetry" - for "Insect fragments, whole dead insects, live insects" the Principle should be: "Visual examination (counting)" - for "Mammalian and/or other excreta" the Method should be "Method V-8 Spices, Condiments, Flavors and Crude Drugs A. General methods for spices, herbs and botanicals (V 32) (https://www.fda.gov/food/laboratory-methods-food/mpm-v-8-spices-condiments-flavors-and-crude-drugs#v32); the Principle should be: "Visual examination followed by Gravimetry" and the Type should be "IV" - for "Visible mould" the Method should be "ISO 927"; the Principle should be: "Visual examination followed by Gravimetry" - for "Rodent filth" the EUMS would like to note, that 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. 	European Union
<p>Disposition Remplacer le mot "disposition" par "paramètres"</p>	Senegal
Table A1: Chemical characteristics for dried sweet marjoram	
<p>Table A1: Chemical characteristics for dried sweet marjoram Tables on Chemical and Physical Characteristics Issue: Chemical and physical defects to ensure minimum quality. Discussion and Rationale: The United States proposes values for the individual chemical and physical characteristics which are indicated in the table. The values the U.S. proposes are the values that the U.S. recommends to the Committee. The information indicated therein came from several sources, including the European Spice Association (ESA) Quality Minima, United States Department of Agriculture (USDA) Requirement for Spices and Spice Blends, the American Spice Trade Association (ASTA) Spice Standards, and other national and industry standards. For the "Ground/powdered" row, the United States recommends the following values:</p> <ul style="list-style-type: none"> - Moisture Content = 10 (delete 12) - Total ash = 15 (delete 16) - Acid insoluble ash = 4 (delete 4.5) 	USA
<p>Table A1: Chemical characteristics for dried sweet marjoram The EUMS suggest the following:</p> <ul style="list-style-type: none"> - The requirement for acid insoluble ash on dry basis for "ground/powdered" form should be the same as for the other styles: 4.5 % w/w on dry basis (max.). - Total ash for the "ground/powdered" form should be 16 % w/w on dry basis (max.). - 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. 	European Union

COMMENT	MEMBER / OBSERVER
<p>Table A1: Chemical characteristics for dried sweet marjoram</p> <p>Kenya notes that drying and processing conditions in producing countries can affect these values.</p> <p>Kenya supports maintaining the values for moisture, ash, and volatile oil in ground/powdered marjoram in square brackets until further technical consensus is reached.</p>	Kenya
<p>Table [A2]: Physical characteristics for dried sweet marjoram</p>	
<p>Table [A2]: Physical characteristics for dried sweet marjoram</p> <p>Tables on Chemical and Physical Characteristics</p> <p>Issue: Physical Characteristics table, Other Factors column</p> <p>Discussion and Rationale: Powder is a natural occurrence in dried culinary herbs in whole and crushed/rubbed/flake styles due to compression, movements and natural breakdown. Therefore, it is recommended to make allowances for powder among the two styles as done in the Codex Standard for Dried Oregano (CXS 342-2021). The United States recommends the allowance (5% in whole and 10% in crushed/rubbed/flaked) from the Codex Standard for Dried Oregano (CXS 342-2021) are inserted in the table for evaluation.</p> <p>The United States proposes values for the individual chemical and physical characteristics which are indicated in the table. The values the U.S. proposes are the values that the U.S. recommends to the Committee. The information indicated therein came from several sources, including the European Spice Association (ESA) Quality Minima, United States Department of Agriculture (USDA) Requirement for Spices and Spice Blends, the American Spice Trade Association (ASTA) Spice Standards, and other national and industry standards.</p> <p>For the "whole" row, the United States recommends the following values:</p> <ul style="list-style-type: none"> - Foreign matter = 1 (delete 0.1) - Insect damage = 5 (delete 1) - Insect fragments = 250 (delete NA) - Mammalian excreta = 2.2 (delete 1) - Other excreta = 22 (delete 10) - Other factors = insert 5% - For the "cracked/rubbed/flaked" row, the United States recommends the following value: <ul style="list-style-type: none"> - Other factors = insert 10% - For the "Ground/powdered" row, the United States recommends the following values: <ul style="list-style-type: none"> - Insect fragments = insert 1175* (delete NA) - Rodent filth = insert 8* (delete NA) - Insert a new footnote to the table "*" = FDA defect action levels" 	USA

COMMENT	MEMBER / OBSERVER
<p>Table [A2]: Physical characteristics for dried sweet marjoram</p> <p>The EUMS suggest the following:</p> <ul style="list-style-type: none"> - “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/v (max). - "Live insects" heading: "count/100 g (max)" should be added. - “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”. <p>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).</p> <p>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.</p> <p>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).</p>	European Union
<p>Table [A2]: Physical characteristics for dried sweet marjoram</p> <p>Table A2: Physical characteristics for dried sweet marjoram, Due to that all parameters/factors for Marjoram (Powdered /Ground) are not applicable N/A, “except Live insects” which should be 0, therefore, it is preferred to remove them from the table, and replaced by add an additional note under the table (Table margin) as follow: Live insects in Marjoram (Powdered /Ground) be 0.</p>	United Arab Emirates
<p>Table [A2]: Physical characteristics for dried sweet marjoram</p> <p>Kenya supports the proposal on limits for extraneous matter, foreign matter, mould, insect presence, and excreta and having ‘crushed/rubbed/flaked styles’ remain bracketed until validated.</p>	Kenya