EU reply to CL 2022/30/OCS-SCH

PROPOSED DRAFT STANDARD FOR DRIED ROOTS, RHIZOMES AND BULBS - TURMERIC (STEP 3)

Mixed competence Member States vote

POINT	COMMENTS
8.2.1	Modify the provision as follows: The common name of the product shall be as described in Section 2.1. to avoid confusion to the consumer. The scientific name of the product is optional.
	Rationale: It has been noted that turmeric may be commercialized in the international trade (especially in India) as 'Indian saffron', risking to misleading/confusing consumers about the true nature and characteristics of the product. Therefore, the common name of turmeric should not be accompanied by such terms, to avoid violation of labelling rules.
Annex I Table 2	Add "on dry basis" to parameters: Total Ash, Acid Insoluble Ash and Total curcuminoids. Rationale: This provision is used in Table 4 of the proposed draft Codex standard and in ISO 5562-1983(E) Standard "Turmeric, whole or ground (powdered) – Specification".
	Replace "Total curcuminoids" with "Colouring power (curcuminoids content)", like in the Table 4, in order to keep consistency in the document. Add "min." at the end of the parameter's name. Rationale: In ISO 5562-1983(E) this parameter is named: "Colouring power, expressed as curcuminoids content, % (m/m) on dry basis, min."
	Choose one form of presenting the unit and use of tag min./max. – with or without brackets for Table 2 and Table 3. We propose presentation as follows: "Moisture content, % w/w (max.)". Rationale: To increase the clarity of the document.

Annex II Table 3

Add "max." at the end of the parameters: mold visible, live insects, insect defiled/infested.

It should be decided which term to use: "Damaged rhizomes" or "defective rhizomes". In ISO 5562-1983(E) there is a parameter "defective rhizomes" (maximum level 5% w/w) with an explanation what defective rhizomes means, i.e.: "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."

The EUMS propose adding the definition to Codex draft standard, explaining what is meant by "damaged rhizomes" or "defective rhizomes" (if there will be a decision to change the name of the parameter).

Mold visible or mould damage (like in Table 4.) – choose one form of description.

According to ISO 5562-1983(E) "Whole turmeric shall be free from living insects and moulds, and shall be practically free from dead insects, insect fragments and rodent contamination". Therefore, the EUMS suggest to change "NA" into "0" for "Live insects" in whole style. It is also worth considering whether, in the case of live insects, the value "0" should be entered for other forms of turmeric. Similarly, we propose to enter a value "0" in "Mold visible" for whole and crushed/cracked/broken style.

The EUMS suggest to add "Dead whole insects" and "Insect fragments" separately to the table. In other Codex standards (for example for nutmeg, saffron) such parameters are mentioned separately in tables. If this proposal would be accepted, then it would be necessary to set appropriate values.

"Insect defiled/infested" or "Insect damage" like in Table 4 – choose one form of description.

The EUMS suggest to give definition of Extraneous/Foreign matter (for other Codex standards there is an explanation under the table). In ISO 5562-1983(E) for turmeric there is only definition of extraneous matter that includes stones and particles of soil. In our opinion there should be the same definition like in standard or we keep two different definitions for both parameters but underline that 2% is for sum of extraneous matter and foreign matter.

"Mammalian excreta" or "Mammalian or/and Other excreta (like in Table 4) – choose one form of description. The EUMS suggest the form from Table 4.

Add a method for damaged rhizomes (or defective rhizomes if the name is changed). Replace "Acid Insoluble Ash (dry basis)" with "Acid insoluble ash (on dry basis)", like in Total Ash. Choose one form - with or without brackets. Replace "Colouring power (curcuminiods content)" with "Colouring power (curcuminoids content) on dry basis". Add ISO 939 in the second column. There is a typo in word "curcuminoids". Replace "Live insect" with "Live insects". Add "Dead whole insects" and "Insect fragments" to the table with ISO 927 standard (if there will be a decision to add these parameters to

Table 3).