

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-THIRD SESSION
KOTA KINABALU, MALAYSIA, MAY 9 – 13, 2005**

**CONSIDERATION OF COUNTRY OF ORIGIN LABELLING
(CL 2004/56-FL)**

GOVERNMENT COMMENTS

COMMENTS FROM:

**CANADA
NORWAY
CONSUMERS INTERNATIONAL (CI)**

CONSIDERATION OF COUNTRY OF ORIGIN LABELLING (CL 2004/56-FL)

GOVERNMENT COMMENTS

CANADA:

Canada considers that more detailed country of origin labelling would not necessarily provide greater benefit to consumers in terms of food safety since it is the responsibility of industry to ensure that the production, processing and sale of foods is in compliance with established food safety standards. The responsibility of government is to set and enforce those standards.

The current provisions of the Codex General Standard for the labelling of prepackaged foods are broad enough to suit most international markets, requiring that the country of origin of the food shall be declared if its omission would mislead or deceive the consumer. However, should the CCFL undertake work there are some areas that could be clarified. In particular, discussion concerning which specific omissions would mislead or deceive the consumer may be beneficial.

There may be circumstances where the consumer could be misled with respect to the origin of a product when a country is declared on the label. The current guidelines give no direction or manner of text that is appropriate where a product is substantially consisting of a single raw product from one country that has undergone some form of processing in another. For example, in circumstances where use of a country of origin to promote a product may be misleading, it could be appropriate to use a qualified claim that more accurately reflects the limited production activity which took place in the country of declaration. For example, "Distilled in Country X", or "Roasted and ground in Country Y from imported coffee beans." More general terms, such as "produced in", or "manufactured in" are likely to be understood by consumers as being synonymous with unqualified "Made in" claims, and should be used with caution.

Concerning the origin of ingredients used in the manufacture of foods, providing additional information on the origin of ingredients is not beneficial to consumers as it would likely create confusion regarding the origin of the food as well as result in additional costs for producers and manufacturers. Also, enforcement of ingredient country of origin declarations would create a financial burden for national enforcement authorities particularly in developing countries.

NORWAY:

Norway has the following comments regarding "Consideration of Country of Origin Labelling":

Section 4.5.2 I *General Standard for the Labelling of Prepackaged Foods* is an example where truthful labels according to the standard might mislead the consumers as to the origin of the food. This was also confirmed in the case studies submitted in the "Report of the Working Group on Misleading Labelling prepared for the 32CCFL May 2004.

To avoid such cases, Norway suggests altering section 4.5.2 to include the indication of type of processing in addition to origin if the omission would mislead or deceive the consumer.

CONSUMERS INTERNATIONAL (CI):

As food production has become increasingly globalised, many consumers are interested in knowing about the origin of their food. This may be for a variety of reasons, including for example particular quality or product characteristics that are associated with a country and to enable them to make informed food choices. In other cases, country of origin information may also be necessary for safety reasons - as seen for example with the differences in geographical risk associated with Bovine Spongiform Encephalopathy (BSE).

We consider that there are two main issues that Codex could usefully work on in this area:

- exploring those situations where country of origin information could usefully be provided
- ensuring that where country of origin information is provided, it does not mislead consumers, given the complex nature of the food supply chain where different aspects of production may take place in different countries.

In both of these respects, Consumers International believes that sections 4.5.1 and 4.5.2 of the Codex General Standard for the Labelling of Prepackaged foods are currently inadequate. Section 4.5.1 states that '*The country of origin of the food shall be declared if its omission would mislead or deceive the consumer*'. We consider that the CCFL should provide further clarification as to how this should be interpreted. Similarly, Section 4.5.2 states that '*When a food undergoes processing in a second country which changes its nature, the country in which the processing is performed shall be considered to be the country of origin for the purposes of labelling*'. We also consider that further clarification and guidance is needed as to information that is provided on the country in which processing occurs, when that differs from the country in which the food is grown. We would like to suggest consideration of various options, including the possibility of guidance on labelling that includes both "grown/ reared in" and "processed in" information."