

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 4

FL/48 CRD17

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Québec City, Québec, Canada

27 October - 01 November, 2024

## CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT)

(Comments from Canada, Kenya, Madagascar, the United Republic of Tanzania)

### Canada

#### **Codex Committee on Spices and Culinary Herbs: Standard for dried floral parts- SAFFRON**

#### **(For Endorsement)**

Canada does not support endorsement of requiring ‘Country of Harvest’ as a mandatory declaration for Dried Floral Parts - Saffron.

CCFL47 requested that CCSCH7:

- a) Clarify the distinction between country of origin and country of harvest,
- b) Provide the rationale why the provision for the country of harvest should be mandatory, and
- c) Show how such a declaration would be beneficial for fraud prevention.

**a) Canada believes that CCSCH7 did not provide an adequate explanation in clarifying the distinction between “country of origin” and “country of harvest”.**

CCSCH7, in its response to CCFL (Appendix II of CX/FL 24/48/4), indicated that country of origin and country of harvest may be the same for many herbs and spices. It further indicated that there may be an incorrect application of country of origin labelling to these foods when a process that does not change the nature of the food results in a change in the origin declared on the label. This is understood to be an issue with how country of origin labelling is applied and enforced, as opposed to an issue of having a gap in requirements.

**b) Canada believes that CCSCH7 did not provide an adequate rationale/justification for why the country of harvest provision should be mandatory.**

Rather, CCSCH7 suggested that country of harvest and country of origin for dried saffron are the same, and that the issue is in how country of origin labelling is implemented. Introducing an additional labelling requirement in this situation would be onerous on food business operators, would set a precedent, and would introduce confusion and inconsistencies between existing Codex texts.

Moreover, according to two articles in the Procedural Manual (under Section 2), any request for endorsement of deviations from general standard provisions – developed by experts in those Committees – should be fully justified and supported by available scientific evidence and other relevant information.

**c) Lastly, CCSC7 did not provide an explanation for how such a declaration would be beneficial for fraud prevention.**

For all the reasons mentioned above, Canada does not believe that CCFL should endorse the mandatory provision for country of harvest in dried saffron.

### Kenya

**Issue 1: REQUEST BY CODEX COMMITTEE ON SPICES AND CULINARY HERBS (CCSCH) on Standard for dried floral parts of Saffron and draft standard for dried or dehydrated roots, rhizomes and bulbs - turmeric**

**Kenya Position:** Kenya does not support inclusion of country of harvest either as mandatory (as proposed for saffron) or option (as proposed for turmeric). Kenya supports other provision requested for turmeric.

**Rationale:** Country of origin as currently provided in CXS 1-1995 is sufficient to provide enough information to consumers. CCSC7 did not provide a response to the question raised by CCFL47 on how country of harvest would deter or prevent fraud in these products. Inclusion of countries of harvest have the potential of introducing unnecessary geographical discrimination in Codex text.

**Issue 2: REQUEST BY CODEX COMMITTEE ON FATS AND OILS (CCFO) ON CXS 329 – 2017 on inclusion of option declaration of astaxanthin in calanus oil**

**Kenya Position:** Kenya supports the endorsement of proposed text to provide for optional declaration of astaxanthin in calanus oil in regions/countries where it is necessary.

**Rationale:** The statement allows countries with national regulations on astaxanthin declarations be accommodated within Codex thus achieving consensus to advance the text for final adoption.

**Issue 3: REQUEST BY FAO/WHO COORDINATING COMMITTEE FOR LATIN AMERICA AND THE CARIBBEAN (CCLAC) on regional standard for castilla lulo (naranjilla)**

**Comment:** Kenya has no objection to endorsement of the provision. However, we seek further clarification of the importance of declaration of the regional/district from which the product is processed.

### Madagascar

**Examen des dispositions relatives à l'étiquetage figurant dans les projets de normes Codex (confirmation)**

**Référence :** CX/FL 24/48/4

**Champ d'application**

Des dispositions concernant l'étiquetage ont été transmises au CCFL par le CCSC7 pour examen et confirmation notamment en ce qui concerne la distinction entre « pays d'origine » et « pays de récolte », la justification d'obligation de la mention du « pays de récolte », ainsi que le bénéfice de cette déclaration pour la prévention des fraudes.

**Positions**

Madagascar soutient la déclaration obligatoire du pays de récolte et du pays d'origine dans le cas spécifique des épices et des herbes culinaires comme pour le safran. Cette question doit également être considéré pour la vanille.

**Justifications**

Le pays de récolte est le pays où la plante a été cultivé et où le collecte des produits issus de ces plantations ainsi que les premières opérations post récolte ont lieu.

Face à une demande croissante de traçabilité et de transparence pour un choix éclairé des consommateurs et une capitalisation de l'authenticité géographique au profit des FBO, il est important de mentionner le "pays de récolte" à part "pays d'origine" sur l'étiquetage. Une visibilité des méthodes de culture spécifiques à chaque région

est importante car elle peut influencer sur les caractéristiques organoleptiques propres à chaque origine grâce à l'impact possible du terroir (englobant le climat et le sol, ...).

Ainsi, les épices rares et d'une grande valeur comme le safran peuvent faire l'objet de fraudes et de falsifications. La mention du pays de récolte peut donc renseigner la provenance du produit avant même la transformation.

Toutes ces préoccupations méritent d'être prises en compte car elles concernent également la vanille dont l'avant-projet de norme va passer incessamment à l'étape 5.

Il est donc proposé d'inclure une définition de « pays de récolte ».

### United Republic of Tanzania

#### **COMMENT**

URT support the proposal from the CCSCCH on the labelling of the country of harvest in saffron and it should be applied to other spices such as cloves

#### **JUSTIFICATION**

To avoid fraud of the products which are rarely grown in the world