

# codex alimentarius commission



FOOD AND AGRICULTURE  
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**AGENDA ITEM NO.10**

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON FOOD LABELLING  
THIRTIETH SESSION  
HALIFAX, CANADA, 6 - 10 MAY 2002**

**DISCUSSION PAPER ON COUNTRY OF ORIGIN LABELLING**

**COMMENTS FROM:**

**CANADA  
INTERNATIONAL COUNCIL OF GROCERY MANUFACTURERS ASSOCIATIONS (ICGMA)**

## DISCUSSION PAPER ON COUNTRY OF ORIGIN LABELLING

### CANADA:

- Canada notes that “country of origin” labelling is a highly complex matter now regulated in many countries under long established legislation and policies. If this initiative is undertaken by the CCFL, a clear and major difficulty will be to establish an internationally uniform, consistent and accepted interpretation of “origin” or “place of origin” for the purposes of accurately labelling a specific food or food ingredient.
- Many different criteria and policies are now used by national governments for determining product or ingredient “origin”, not only for consumer information purposes but for many other reasons such as to classify products for the purposes of assessing import duties and tariffs.
- Further, accurate origin determinations and meaningful label declarations present special difficulties in the case of multi-ingredient foods comprised of numerous components which may have originated or been processed in different countries with the finished food manufactured, packaged or labelled still elsewhere. For imported foods, even when “origin” information is declared, ensuring the accuracy of such label declarations is frequently difficult. Inaccurate origin declarations are misleading to consumers.
- Canada believes that “origin” information is very important to many consumers and now requires this information to be shown on many foods. However, there are significant complexities which would need to be addressed for Codex to successfully reach an acceptable, internationally uniform and consistent approach to origin declarations on food labels. Accordingly, Canada suggests that the CCFL should consider this proposal very carefully before deciding to undertake further work in this difficult area.

### INTERNATIONAL COUNCIL OF GROCERY MANUFACTURERS ASSOCIATIONS (ICGMA):

ICGMA, a recognized INGO before the Codex Alimentarius Commission, represents the interests of national and regional associations who collaborate with all sectors of the consumer packaged goods industry. ICGMA promotes the harmonization of scientific standards and policies concerned with health, safety, packaging, and labelling of foods, beverages, and other consumer packaged goods. ICGMA also works to facilitate international trade in these sectors by eliminating or preventing artificial barriers to trade.

#### General Comments:

We believe that the Codex Committee on Food Labelling (CCFL) should not begin new work in the area of country of origin labelling, and should instead stay focused on labelling issues that promote science-based health and food safety objectives. ICGMA continues to oppose efforts to impose extraneous food labelling requirements that afford no health or safety benefits to consumers. Country of origin labelling for ingredients serves only to increase the costs of

production for food producers and regulatory costs of governments—particularly those in developing countries. Mandating country of origin labelling across the board or expanding it to include ingredients would be burdensome, impractical, and provide no additional benefit to the consumer. Country of origin labelling has no relation to public health or food safety, and conveys no useful information to the consumer regarding the health or safety of the product.

**Comments to the “Discussion Paper on Country of Origin Labelling.” (ALINORM 01/21):**

As stated previously, ICGMA supports providing “factual, verifiable, understandable and non-misleading information” relevant to the protection of consumers’ health and to ensure fair practices in food trade. For this reason, we support the existing Codex general standard that requires country of origin labelling only in cases where its omission would mislead or deceive the consumer. This requirement is appropriately focused on the objective of preventing consumer deception.

Furthermore, ICGMA believes that the “Discussion Paper on Country of Origin Labelling” is potentially violative of the World Trade Organization’s (WTO) trade agreements. Specifically, Article 2.2 of the Agreement on Technical Barriers to Trade (TBT Agreement) provides that technical regulations shall not be “prepared, adopted, or applied with a view to or with the effect of creating unnecessary obstacles to international trade.” To ensure that no unnecessary obstacles are erected, the Agreement requires that any regulations enacted “shall not be more trade-restrictive than necessary to fulfill a legitimate objective.”

Country of origin labelling is an *obstacle* to trade because the enormous compliance and regulatory costs will force many producers, especially those in developing nations, out of the market. It is also *unnecessary* because it is something that could be achieved in a less trade-restrictive manner, for instance through the establishment of a voluntary system for labelling. Additionally, country of origin labelling does not *fulfill a legitimate objective* because it does nothing to advance the health and safety of consumer products. Country of origin labelling requirements do not fulfill Codex’s mandate of “protecting the health of the consumer and ensuring fair practices in the food trade.”

Moreover, work on international harmonization of rules of origin has been underway for several years in the WTO, with technical assistance from the World Customs Organization (WCO) (formerly the Customs Cooperation Council). This work was mandated by the WTO Agreement on Rules of Origin that was concluded in 1994 as part of the Uruguay Round of Multilateral Trade Negotiations. ICGMA continues to raise concerns that setting Codex standards based on political pressures will duplicate, and even contradict, the work of the WTO and WCO.

Finally, ICGMA remains concerned about the impact of country of origin labelling requirements on developing nations. Developing countries are oftentimes left out of the decision-making process even though they are the hardest hit by the costs imposed by new regulations. Many developing nations will not be able to absorb the costs of these new labelling requirements which fail to offer any safety or health benefits to consumers. As a result, they will be forced out of the international market and suffer significant economic losses.

The costs of this labelling scheme will be most onerous for small processors. With the significant additional costs of country of origin labelling, these companies will no longer be able to compete

in the global marketplace and will be forced out of business, seriously impairing free trade and consumer choice.

In conclusion, for the reasons discussed above, ICGMA strongly urges CCFL to refrain from beginning new work in the area of country of origin labelling. Instead, CCFL should remain focused on labelling issues that promote science-based health and food safety objectives.