

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 4.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 7TH SESSION OF THE CODEX COMMITTEE ON SPICES AND CULINARY HERBS FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 8, Step 5/8, and Step 5 of the Procedure and other matters as indicated in the relevant Circular Letters ([CL 2024/31-CAC](#), [CL 2024/32-CAC](#), [CL 2024/33-CAC](#), and [CL 2024/34-CAC](#)). The comments are those received through the Codex Online Commenting Systems (OCS)¹, or via email by the time this document was issued. The comments are as shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

2. The comments received are presented in a table format, with two columns as follows:
 - **First column** – Presents the comments with the rationale.
 - **Second column** – Presents the provider of the comments (name of member or observer)

¹ OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

**DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES
– SMALL CARDAMOM**

(AT STEP 8)

COMMENTS IN REPLY TO CL 2024/31-CAC

Comments by Brazil, Burundi, Egypt, Guatemala, Iraq, Mexico, Paraguay, Peru, Thailand, Uganda, United Arab Emirates, and ICUMSA

COMMENT	MEMBER / OBSERVER
Oui	Burundi
Egypt agrees with the document ,with proposes to delete " immature and shrivelled seeds." form footnote in point "C" Light seeds include seeds that are brown or red in colour, and broken, immature and shrivelled seeds because it is already mentioned in seperate coulumn and in case remaine it in point "C" , the immature and shrivelled seeds will calculate two times.	Egypt
La forma de presentación CÁPAULAS/VAINAS ENTERAS EN POLVO es como debe de estar en los cuadros, así se acordó en la descripción de formas de presentación	Guatemala
Agree with draft standard	Iraq
Se está a favor de la adopción del documento en trámite ocho, de cara a la próxima Reunión de la Comisión del Codex Alimentarius.	Mexico
Paraguay apoya la adopción de este documento.	Paraguay
La Comisión Técnica de Especies y Hierbas Culinarias agradece al Comité del Codex por él envió de la carta circular CL 2024/31-CAC Solicitud de observaciones en el trámite 8 sobre el Proyecto de norma para especias derivadas de bayas y frutos secos o deshidratados: cardamomo pequeño. La Comisión NO tiene observaciones o comentarios sobre el trámite 8 presentados por el Comité del Codex de Especies y Hierbas Culinarias.	Peru
Thailand does not object the adoption of DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES – SMALL CARDAMOM at step 8.	Thailand
Uganda appreciates the work in the development of this standards and supports its final adoption.	Uganda
United Arab Emirates comments on CL 2024/31-CAC SUBJETC: Request for comments at Step 8 on the draft Standard for spices derived from dried or dehydrated fruits and berries – small cardamom Regarding the invitation to provide comments at Step 8 on the above-mentioned draft Standard, United Arab Emirates, UAE considered the draft standard is ready for adoption with the following proposed amendments: - Because the terms dried and dehydrated are not synonymous, especially regarding the maximum allowed limits of moisture, therefore it is suggested to define each term separately in this draft Standard, for example to mention that the term (dried fruits and berries – small cardamom), means the product with no more than % Moisture, while the term (dehydrated fruits and berries – small, cardamom) means the product with no more than % Moisture. - In Annex 1, Table 2. Physical characteristics for dried or dehydrated small cardamom. Due to that all parameters/factors for sub products (Small Cardamom - Powdered seeds and Powdered Capsules with seeds) are not applicable N/A, "except Live insects (by count) /100 g (max)", 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: h Live insects (by count) /100 g (max) in Powdered seeds and Powdered Capsules with seeds should be 0.	United Arab Emirates
ISO 939 and ISO 928 are shown listing "distillation and gravimetry" but both methods are gravimetry only (no distillation).	ICUMSA

**DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES –
ALLSPICE, JUNIPER BERRY, AND STAR ANISE**

(AT STEP 8)

COMMENTS IN REPLY TO CL 2024/32-CAC

Comments by Egypt, Guatemala, Iraq, Paraguay, Peru, Thailand and United Arab Emirates

COMMENT	MEMBER / OBSERVER
Egypt agrees to adopt this document	Egypt
El proyecto de norma esta listo para su adopción.	Guatemala
Agree with draft standard	Iraq
Paraguay apoya la aprobación de este documento.	Paraguay
: La Comisión Técnica de Especies y Hierbas Culinarias agradece al Comité del Codex por él envió de la carta circular CL 2024/32-CAC Solicitud de observaciones en el trámite 8 sobre el Proyecto de norma para especias derivadas de bayas y frutos secos o deshidratados: pimienta de Jamaica, baya de enebro y anís estrellado La Comisión NO tiene observaciones o comentarios sobre el trámite 8 presentados por el Comité del Codex de Especies y Hierbas Culinarias.	Peru
Thailand does not object the adoption of DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES -ALLSPICE, JUNIPER BERRY AND STAR ANISE at step 8.	Thailand
United Arab Emirates comments on CL 2024/32-CAC SUBJEC: Request for comments at Step 8 on the draft Standard for spices derived from dried or dehydrated fruits and berries – allspice, juniper berry, and star anise Regarding the invitation to provide comments at Step 8 on the above-mentioned draft Standard, United Arab Emirates, UAE considered the draft standard is ready for adoption with the following proposed amendments: - To Replace the paragraph 6. HYGIENE 6.1: (It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), Code of Hygienic Practice for Low-Moisture Foods (CXC 75-2015) Annex III, and other relevant Codex texts). By the following paragraph (The products covered by the provisions of this standard should comply with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), Code of Hygienic Practice for Low-Moisture Foods (CXC 75-2015) Annex III, and other relevant Codex texts). - To remove (optional) word from paragraph 8.3.2 to be as follow: 8.3.2 Country of harvest - To Replace the paragraph 8.3.3 Region of harvest and year of harvest (optional), By the following paragraphs: 8.3.3 Region of harvest (optional) 8.3.4 Year of harvest - Because the terms dried and dehydrated are not synonymous, especially regarding the maximum allowed limits of moisture, therefore it is suggested to define each term separately in this draft Standard, for example to mention that the term (dried fruits and berries – ALLSPICE, JUNIPER BERRY AND STAR ANISE), means the product with no more than % Moisture, while the term (dehydrated fruits and berries – ALLSPICE, JUNIPER BERRY AND STAR ANISE) means the product with no more than % Moisture. - In Annex 1, Table 2 - Physical Characteristics for spices derived from dried or dehydrated fruits and berries.	United Arab Emirates

<p>Due to that all parameters/factors for sub products (Star Anise - Ground/ Powdered) are not applicable N/A, "except Live insects (by count) /100 g (max)", which should be 0, therefore, it is preferred to remove it from the table, and replaced by add an additional note under the table (Table margin) as follow: 1 Live insects (by count) /100 g (max) in (Star Anise - Ground/ Powdered) should be 0.</p>	
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**DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES –
TURMERIC
(AT STEP 5/8)**

COMMENTS IN REPLY TO CL 2024/33-CAC

Comments by Egypt, Guatemala, Indonesia, Iraq, Paraguay, Peru, Thailand and United Arab Emirates

COMMENT	MEMBER / OBSERVER
Egypt agrees to adopt this document	Egypt
EL proyecto de norma esta listo para si adopción	Guatemala
Indonesia would like to reiterate its position at the 7th session of the Codex Committee on Spices and Culinary Herbs (CCSCH) where Indonesia proposed that the maximum ash content of turmeric should be 9% for all style.	Indonesia
Agree with draft standard	Iraq
Paraguay apoya la aprobación de este documento.	Paraguay
La Comisión Técnica de Especies y Hierbas Culinarias agradece al Comité del Codex por él envió de la carta circular CL 2024/33-CAC Solicitud de observaciones en el trámite 5/8 sobre el Proyecto de norma para especias derivadas de raíces, rizomas y bulbos o desecados o deshidratados: cúrcuma La Comisión NO tiene observaciones o comentarios sobre el trámite 5/8 presentados por el Comité del Codex de Especies y Hierbas Culinarias.	Peru
Thailand does not object the adoption of DRAFT STANDARD FOR DRIED OR DEHYDRATED ROOTS, RHIZOMES AND BULBS - TURMERIC at step 5/8.	Thailand
<p>United Arab Emirates comments on CL 2024/33-CAC SUBJETC: Request for comments at Step 5/8 on the draft Standard for spices derived from dried or dehydrated roots, rhizomes and bulbs – turmeric</p> <p>Regarding the invitation to provide comments at Step 5/8 on the above-mentioned draft Standard, United Arab Emirates, UAE considered the draft standard is ready for adoption with the following proposed amendments:</p> <ul style="list-style-type: none"> - To Replace the paragraph 6. <p>HYGIENE 6.1: (It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969) the Code of Hygienic Practice for Low Moisture Foods (CXC 75-2015) Annex III on Spices and Aromatic Herbs, and other relevant Codex texts).</p> <p>By the following paragraph</p> <p>(The products covered by the provisions of this standard should comply with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969) the Code of Hygienic Practice for Low Moisture Foods (CXC 75-2015) Annex III on Spices and Aromatic Herbs, and other relevant Codex texts). –</p> <p>To remove (optional) word from paragraph 8.3.2 to be as follow:</p> <p>8.3.2 Country of harvest - To Replace the paragraph 8.3.3 Region of harvest and year of harvest (optional), By the following paragraphs:</p> <p>8.3.3 Region of harvest (optional) 8.3.4 Year of harvest</p> <ul style="list-style-type: none"> - Because the terms dried and dehydrated are not synonymous, especially regarding the maximum allowed limits of moisture, therefore it is suggested to define each term separately in this draft Standard, <p>for example to mention that the term (Dried ROOTS, RHIZOMES AND BULBS - TURMERIC), means the product with no more than % Moisture, while the term (Dehydrated ROOTS, RHIZOMES AND BULBS - TURMERIC) means the product</p>	United Arab Emirates

<p>with no more than % Moisture. - In Annex 1, Table 2 - Physical characteristics for dried or dehydrated turmeric. Due to that all parameters/factors for sub products (Turmeric - Powdered /Ground) are not applicable N/A, "except Live insects (by count) /100 g (max)", which should be 0, therefore, it is preferred to remove it from the table, and replaced by add an additional note under the table (Table margin) as follow: 5 Live insects (by count) /100 g (max) in (Turmeric - Powdered /Ground) should be 0.</p>	
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THE DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES – VANILLA

(AT STEP 5)

COMMENTS IN REPLY TO CL 2024/34-CAC

Comments by Bhutan, Brazil, Egypt, Guatemala, Indonesia, Mexico, Paraguay, Peru, Thailand, United Arab Emirates and USA

COMMENT	MEMBER / OBSERVER
<p>2.2. Styles</p> <p>Vanilla may be:</p> <ul style="list-style-type: none"> - Whole beans/ complete beans with seeds and pulp inside - Splits - Beans that are naturally split. - Cut – short vanilla beans of varying lengths. <p>- Vanilla pulp and seeds/ [Vanilla-Caviar] [Vanilla Supreme] - comprising of vanilla pulp and seeds, or</p> <p><i>Brazil comment: no restrictions for any proposed term. The chosen term should correctly reflect the current trade practices.</i></p> <p>4. FOOD ADDITIVES</p> <p>4.1. [Anticaking agents listed in Table 3 of the <i>General Standard for Food Additives</i> (CXS 192-1995) are acceptable for use in ground/powdered form of product conforming to this standard.] <i>Brazil comment: we have no objection to keep this provision about anticaking agents. Our understanding is that this agent is necessary to keep the quality of the product offered in styles such as ground and powered and those agents are widely used in the food industry.</i></p> <p>8. LABELLING</p> <p>8.2.4. Trade name, species, or cultivar may [shall] be listed on the label.</p> <p><i>Brazil comment: we prefer to keep "may" due to the lack of availability of analytical methods to identify the specie or cultivar. Also the identification of the specie is a commercial demand and defined between the seller and the buyer in the contract.</i></p> <p>8.3. Country of origin and country of harvest</p> <p>8.3.3. Country of harvest (optional) [mandatory]</p> <p><i>Brazil comment: we prefer to keep the country of origin as "optional". We understand that information on country of harvest (i) is not easily traceable, for example batches of products originating from different countries; (ii) is not verifiable at the point of entry at the time of inspection; (iii) has no definition in any international body, including WTO; (iv) it could cause problems in international trade as it is mandatory for certain products (e.g. vanilla, saffron) and optional for others without clear criteria; (v) the topic must be defined by the CCFL, is beyond the scope of the CCSCH.</i></p> <p>Annex 1</p> <p>Table 1. Chemical characteristics for vanilla</p> <p>[Option 1. Table 1. Chemical characteristics of vanilla per style]</p> <p><i>Brazil comment: we are not in favor of Option 1. The vanillin content parameters presented in the table will only allow V. planifolia and V. odorata to be considered in the standard.</i></p> <p>[Option 2. Table 1. Chemical characteristics for vanilla per species]</p> <p><i>Brazil comment: we are in favor of Option 2. In the "Table 1: Species of vanilla covered by this standard" there are five vanilla species and it is important also to recognize the different chemical characteristics of those species. Although currently the international trade is dominated by V. planifolia, there is a great potential for other species to grow in the market in the near future. The idea of</i></p>	<p>Brazil</p>

recognizing other species in the standard is also aligned with the idea of fostering food alternatives and the diversification of food products.

An intermediate solution (Option 3) is presented as an alternative trying to reach a *con sensu*, simpler than Option 2. While still keeping species distinction, it intends to facilitate for inspection agencies, as ranges are reduced.

[Option 3. Table 1. Chemical characteristics for vanilla per two group of species]

Scientific Name	Form/Style	Moisture content %w/w	Vanillin content [weight] g/100g (min)
<i>Vanilla planifolia</i>	Whole	35 – 38	1.4
<i>Vanilla odorata</i>	Split	15 – 35	1.2
<i>Vanilla cribbiana</i>	Cut	15-25	1.2
	Ground/powdered	10-25	0,7
	[Vanilla caviar]	<15	0,5
		25 -35 [10-35]	1
<i>Vanilla x tahitensis</i>	Whole	20 - 40	0.02
	Cut	15 - 38	0.02
	Ground/powdered	10-25	0.01
	<i>Vanilla pompona</i>	[Vanilla caviar]	15 - 35 [10-35]

Table 2. Physical characteristics for vanilla

Brazil comment: if the color tolerance is kept is necessary to clarify the unit (% w/w) and the relation with the proposed method of analysis such as the "Munsell Colour Chart".

Regarding the Test Methods of all the parameters , we can also keep any validated Test Methods

Bhutan

Please find attached Brazil's comments regarding CL 2024/34-CAC:

2.2 Vanilla pulp and seeds/ [Vanilla-Caviar] [Vanilla Supreme] - comprising of vanilla pulp and seeds, or (...)

Brazil comment: no restrictions for any proposed term. The chosen term should correctly reflect the current trade practices.

4. FOOD ADDITIVES

4.1. [Anticaking agents listed in Table 3 of the General Standard for Food Additives (CXS 192-1995) are acceptable for use in ground/powdered form of product conforming to this standard.]

Brazil comment: we have no objection to keep this provision about anticaking agents. Our understanding is that this agent is necessary to keep the quality of the product offered in styles such as ground and powered and those agents are widely used in the food industry.

8.2.4. Trade name, species, or cultivar may [shall] be listed on the label.

Brazil

<p>Brazil comment: we prefer to keep "may" due to the lack of availability of analytical methods to identify the specie or cultivar. Also the identification of the specie is a comercial demand and defined between the seller and the buyer in the contract.</p> <p>8.3.3. Country of harvest (optional) [mandatory]</p> <p>Brazil comment: we prefer to keep the country of origin as "optional". We understand that information on country of harvest (i) is not easily traceable, for example batches of products originating from different countries; (ii) is not verifiable at the point of entry at the time of inspection; (iii) has no definition in any international body, including WTO; (iv) it could cause problems in international trade as it is mandatory for certain products (e.g. vanilla, saffron) and optional for others without clear criteria; (v) the topic must be defined by the CCFL, is beyond the scope of the CCSCCH.</p> <p>Annex 1</p> <p>Table 1. Chemical characteristics for vanilla</p> <p>[Option 1. Table 1. Chemical characteristics of vanilla per style]</p> <p>Brazil comment: we are not in favor of Option 1. The vanillin content parameters presented in the table will only allow <i>V. planifolia</i> and <i>V. odorata</i> to be considered in the standard.</p> <p>[Option 2. Table 1. Chemical characteristics for vanilla per species]</p> <p>Brazil comment: we are in favor of Option 2. In the "Table 1: Species of vanilla covered by this standard" there are five vanilla species and it is important also to recognize the different chemical characteristics of those species. Although currently the international trade is dominate by <i>V. planifolia</i>, there is a great potential for other species to grow in the market in the near future. The idea of recognizing other species in the standard is also aligned with the idea of fostering food alternatives and the diversification of food products.</p> <p>Brazil proposes Option 3 as an intermediate solution, presented as an alternative aiming to reach a consensus, simpler than Option 2. While still keeping species distinction, it intends to facilitate the work of inspection agencies, as ranges are reduced. The table mentioned in Option 3 (Table 1: Chemical characteristics for vanilla per two groups of species) will be sent via e-mail.</p> <p>Table 2. Physical characteristics for vanilla</p> <p>Brazil comment: if the color tolerance is kept is necessary to clarify the unit (% w/w) and the relation with the proposed method of analysis such as the "Munsell Colour Chart".</p>	
<p>Egypt agrees to adopt the document with a proposal to be the Country of harvest [mandatory] at item 8.3.2</p>	Egypt
<p>El proyecto de norma esta listo para su adopción</p>	Guatemala
<p>As stated at the 7th session of the CCSCCH, Indonesia maintains its position that split vanilla beans should be classified under the whole style category.</p>	Indonesia
<p>En seguimiento a los acuerdos y compromisos alcanzados durante la 7a reunión del Comité del Codex para Especies y Hierbas Culinarias (párrafo 70 y apéndice V del informe REP 24/SCH). México considera que el proyecto está listo para su adopción en trámite 5, quedando pendiente la adopción de cualquiera de las dos opciones a la tabla 1 del anexo 1 y algunos puntos sobre el etiquetado, temas que siendo de carácter técnico, serán resueltos en su oportunidad, con el apoyo del GTe y por los países miembro que gestionen sus comentarios previo a la próxima sesión plenaria del CSHC a realizarse en 2025.</p> <p>En ese orden de ideas, México se pronuncia a favor de promover el documento al trámite 5 en la próxima reunión de la Comisión del Codex a realizarse en octubre/noviembre del 2024.</p>	Mexico
<p>Paraguay apoya la adopción en el trámite 5 de este documento.</p>	Paraguay
<p>La Comisión Técnica de Especies y Hierbas Culinarias agradece al Comité del Codex por él envió de la carta circular CL 2024/34-CAC Solicitud de observaciones en el</p>	Peru

<p>trámite 5 sobre el Proyecto de norma para especias derivadas de bayas y frutos secos o deshidratados: vainilla</p> <p>La Comisión NO tiene observaciones o comentarios sobre el trámite 5/8 presentados por el Comité del Codex de Especies y Hierbas Culinarias.</p>	
<p>Thailand does not object the adoption of DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES - VANILLA at step 5.</p>	Thailand
<p>The products covered by the provisions of this standard should comply with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), Code of Hygienic Practice for Low-Moisture Foods (CXC 75-2015) Annex III, and other relevant Codex texts</p>	United Arab Emirates
<p>GENERAL COMMENT:</p> <p>The United States of America submits the following comments in support of the activities of the Codex Committee on Spices and Culinary Herbs and in response to draft Codex standard for spices derived from dried or dehydrated fruits and berries – vanilla. REP24/SCH paragraph 70 (i) and Appendix V. The United States draws attention that fact the international trade in dried vanilla and inspection practices precedes this draft Codex standard by more than a century, therefore, the different established trade and inspection practices must be taken into consideration in developing the standard.</p> <p>Section 2.2 - Styles -</p> <p>Regarding the issue of retaining the style trade name “vanilla caviar” in the standard, this name is well established in trade and is not confused with another product. As far as the United States understands, there are no reports in trade of confusing vanilla caviar with caviar- the fish product. The word “Vanilla” is a qualifier that is placed before the word caviar to describe the product. Therefore, the United States does not support a name change because it is unwarranted, costly and be very disruptive to the vanilla trade.</p> <p>Section 4 - Food Additives</p> <p>Regarding the issue of the permitted use of food additives in ground/powdered form of dried vanilla, the food additive use in ground/powdered dried vanilla predates the development of this Codex standard. The food additive use was approved by Codex and is found in the Codex General Standard for Food Additives (GSFA) Food Category: 12.2.1 Herbs & Spices.</p> <p>The existing CCSCH Standard Layout text used in this section does not make the use of food additives mandatory, but only states that they are permitted. Therefore, in countries that customarily use food additives in ground vanilla or those that do not can maintain their national practice.</p> <p>Food additives are permitted and used in this product in several countries, and within the United States for over 50 years without any reported issues. The permitted use is directed by Code of Federal Regulations (CFR) Title 21 Sec. 169.179 Vanilla powder. https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?fr=169.179</p> <p>Therefore, the United States supports maintaining the existing Standard Layout text. Codex Standards are for consumer protection and trade Facilitation, therefore, should reflect the broadest array of trade practices. The standard must not impose new requirements that impede on or unwarranted supersede established national and trade practices.</p> <p>Section 8.3.2 - Country of origin and country of harvest</p> <p>Regarding the issue of efforts to make both the indication of “trade name, species or cultivar” and “country of harvest mandatory”, the existing Codex General Standard for the Labeling of Prepackaged Food (GSLPF) (CXS 1-1985) makes these provisions optional.</p> <p>Requiring the mandatory indication of the trade name, species or cultivar may on the label means the importer must scientifically verify this requirement. Is there a fraudproof (scientific) system/method that the importer/buyer can used for verification</p>	USA

<p>within the inspection time constraint? If the answer is yes, who bears the cost? Whereas, if the answer is only copying the information from accompanying shipping documents, how does copying the information provided by the exporter protect the importer from fraud?</p> <p>Also making the mandatory indication of "Country of harvest" is inconsistent with current global trade practices. Codex system does not have any scientific method to correctly validate this requirement. Codex is a scientific forum, therefore, making a provision mandatory without a scientific method of analysis/verification invalidates the provision.</p> <p>None of the intergovernmental agreements on international trade or international trade documents (World Trade Organization, World Customs Organization) include "country of harvest". This is not current defined in international trade. CCFL45 stated that Paragraph 41 in the General Standard for the Labeling of Prepackaged Food (GSLPF) (CXS 1-1985) defines the term "country of origin" while there is no definition for the term "country of harvest" in the GSLPF.</p> <p>Therefore, the United States reminds Codex that inspection agencies issue certificates of conformity that are "prima facie" documents (primary evidence in the court of law). Therefore, inspectors must be certain of the information therein. If they are only copying the information on documents accompanying the product, how can they legally attest to the "trade name, species or cultivar and/or country of harvest". Without scientific evidence, they are unable to prove such requirements, thus rendering the conformity certificate fraudulent or useless and exposing them and to legal jeopardy.</p>	
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