



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

**Agenda item 2.1**

**CX/FL 26/49/2 Add.1**  
**March 2026**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

11-15 May 2026

### THE USE OF “COUNTRY OF HARVEST” IN ADDITION TO THE MANDATORY DECLARATION OF COUNTRY OF ORIGIN IN FOOD LABELLING OF SPICES

(Prepared by the Electronic Working Group chaired by Canada and Iran and co-chaired by India and Madagascar)

#### INTRODUCTION

1. The use of Country of Harvest (COH) in the labelling of spices has been discussed for several years, by several Codex Committees.
2. Following approval at the 40<sup>th</sup> session of the Codex Alimentarius Commission (CAC40) of the work, the Codex Committee on Spices and Culinary Herbs (CCSCH) undertook work on 7 spice standards. At Step 5/8 (for dried garlic) and Step 5 (for oregano, basil, ginger, cloves, saffron), the labelling provisions for these 6 CCSCH draft standards were referred to the Codex Committee on Food Labelling (CCFL) for endorsement.
3. CCFL45 (2019) discussed the labelling provisions on “Country of Origin/Country of Harvest” in the above mentioned CCSCH standards.
4. CCFL45 did not endorse these provisions, noting that the phrase “Country of Origin/Country of Harvest” was not clear whether both the country of origin and country of harvest should be declared or only one was required. CCFL45 referred the provisions on country of origin/country of harvest back to CCSCH for further consideration, for all 6 standards. CCSCH5 (2021) considered the labelling provisions for all 6 standards as a group and agreed to keep both provisions in the standards, to split “Country of Origin/Country of Harvest” into two independent and clear provisions, with “Country of Origin” being mandatory and “Country of Harvest” being optional. CCSCH5 also determined that these provisions would be reconsidered in individual standards, should the need arise. CCSCH agreed to inform CCFL of these decisions.
5. CCSCH5 also discussed the 6 individual standards, agreeing to forward 5 of the standards, oregano, ginger, basil, nutmeg and cloves, to CAC for adoption at Step 8, and forward the labelling provisions to CCFL46 (2021) for endorsement, with “Country of Origin” being mandatory and “Country of Harvest” being optional. For saffron, CCSCH5 could not reach consensus on the country of origin and country of harvest issue for saffron, therefore returned these two provisions to Step 6 for further discussion and not forwarded to CCFL46 for endorsement.
6. CCFL46 endorsed the labelling provisions in the 5 draft standards for oregano, ginger, cloves, basil and nutmeg, all at Step 8, with “Country of Origin” being mandatory and “Country of Harvest” being optional.
7. CCSCH6 (2022) continued to discuss country of origin and country of harvest labelling of saffron. There were divergent views on whether country of harvest should be optional or mandatory. Noting the divergent views expressed by delegations, and recalling the Committee’s previous decisions, the CCSCH Chair proposed that labelling provisions should remain as proposed by the EWG, and therefore the country of harvest shall be declared mandatory. CCSCH6 endorsed the proposal noting that there was general support for the mandatory declaration of country of harvest. Three delegations expressed reservations. CCSCH forwarded the standard for adoption at Step 8, and endorsement by CCFL and by the Codex Committee on Methods of Analysis and Sampling (CCMAS).
8. CAC45 (2022) then adopted the saffron standard at Step 8, subject to endorsement by CCFL of the labelling provisions on country of origin and country of harvest. Two members had reservations at CAC45, noting that the provision for the mandatory declaration of country of harvest was contrary to the advice provided to CCSCH by CCFL.

9. CCFL47(2023) was requested to endorse the labelling provisions for country of origin and country of harvest in the draft standard for dried saffron. Divergent opinions were once again voiced by members on this issue, both in favour of and against mandatory country of harvest labelling.

10. CCFL47 agreed to refer the labelling provisions for the country of origin and country of harvest to CCSCH for reconsideration, and to request CCSCH to clarify the distinction between country of origin and country of harvest, provide the rationale why the provision for the country harvest should be mandatory and how such a declaration would be beneficial for fraud prevention.

11. CCSCH7 (2024) considered the request from CCFL and prepared a response<sup>1</sup> to CCFL. The response noted the definition for “country of origin” as contained in the *General Standard for the Labelling of Pre-packaged Foods* (CXS 1-1985) was generally broad and therefore applicable to all foods. CCSCH7 further noted that there was no definition in Codex for “country of harvest”, however, the glossary of terms that CCSCH had developed to facilitate its work, included a definition for the term “harvest”. CCSCH also noted in its response to CCFL that even though the country of origin and the country of harvest may be the same for many herbs and spices, these are two different terms.

12. CCFL48 (2024) discussed the CCSCH response and the request for the endorsement of the labelling provisions for dried saffron. CCFL48 was unable to reach consensus to endorse mandatory declaration of country of harvest and thus referred the matter to CCEXEC87(2024) and CAC47(2024) for consideration.

### TERMS OF REFERENCE

13. To find a path forward, CAC47 requested the Codex Secretariat to issue a Circular Letter (CL) to Members and Observers seeking potential solutions for the use of country of harvest in food labelling of spices, recognizing the concerns that had been expressed by Codex Members, and established an electronic working group (EWG), reporting to CCFL, with the following tasks:

14. To review the information gathered from the comments to the CL, and discussions at CCSCH, CCFL and CAC47 to:

- provide potential options which recognize Members’ perspectives on the use of COH in addition to the mandatory declaration of country of origin (COO) in food labelling of spices, including saffron and vanilla;
- review options for a definition for COH and consider how it differs from COO;
- consider whether any clarifications are needed to the application of labelling provisions; and
- prepare a report for consideration of CCFL49.

15. The List of Participants for this EWG is provided in Appendix II.

### PARTICIPATION AND METHODOLOGY

16. CL 2025/07-FL was issued in February 2025, with a deadline of May 31, 2025, to all Members and Observers to assist in addressing the potential solutions to the use of COH in food labelling of spices. There were 23 replies to CL 2025/07-FL, from 19 Members, 1 Member Organization, and 3 Observer organizations. The replies to CL 2025/07-FL can be found via this [link](#) (for translated documents, please refer to Annex of CX/SCH 25/8/2 Add.1). A summary of the replies to CL 2025/07-FL are found in Appendix I.

17. Based on replies to CL 2025/07-FL, an EWG Consultation Paper was prepared and shared to the EWG on October 7, 2025. The consultation paper: summarized the responses to CL 2025/07-25; identified potential options for consideration by EWG members; and posed key questions for further consideration by the EWG. These responses from the consultation, together with information from the responses to CL 2025/07-FL, and the previous discussions at CCSCH, CCFL and CAC47, form the basis of the analysis and recommendations of this EWG report.

### ANALYSIS OF DISCUSSIONS

18. The information gathered from the responses to CL 2025/07-FL, comments received during the EWG, and previous discussions within Codex, have provided a good basis for understanding this issue and exploring potential options to address it.

19. Members and Observers agree overall on the importance of transparency, traceability, fraud prevention, consumer information, accurate labelling and consistency with the *General standard for the labelling of pre-packaged foods* (CXS 1-1985). The specific questions posed in both the CL and EWG have enabled the identification of 3 key labelling issues affecting discussions on country of harvest labelling:

---

<sup>1</sup> REP24/SCH, Appendix II Part A

- a) Inconsistent interpretation and application of country-of-origin labelling
- b) Lack of specificity in Codex texts regarding blends of spices of the same type from different origins
- c) Interest by some Members in using labelling for marketing based on qualities or characteristics associated with origin

20. These key issues are the fundamental “problems to be solved” by CCFL, as they have been determined to be the underlying areas where there may be lack of clarity or common understanding in labelling, and the reasons for interest in country of harvest labelling. The results of the EWG suggest that these are the areas to focus discussions and the development of options. Several CL and EWG questions related to the same theme. As such, the summary below does not go through each CL and EWG question individually but rather summarizes the overall themes that emerged.

21. The three key issues listed above are further explored below. Other issues, such as enforcement, traceability, safety and trade are summarized together, recognizing that these do not relate directly to labelling and fall outside of CCFL’s expertise.

**a) Inconsistent interpretation and application of country-of-origin labelling.**

22. In an effort to understand why some members do not view country of origin labelling as sufficient in the labelling of certain spices and culinary herbs, CL 2025/07-FL asked members and observers to provide perspectives on when the processing of spices might change their nature. The EWG Chairs and Co-Chairs recognize that the purpose of this question was to better understand where the country of origin of spices and culinary herbs may differ from the country where they were harvested, which in turn may inform why some members have an interest in the use of country of harvest labelling in addition to the mandatory labelling of country of origin.

23. The *General standard for the labelling of pre-packaged foods* (CXS 1-1985) (GSLPF), Section 4.5 country of origin 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.”*

24. CXS 1-1985 does not describe what a “change in nature” would be. It also does not have a provision related to country of harvest.

25. In response to the CL, members and observers noted that inconsistent understanding of the processes that change the nature of the food (and therefore the country of origin) for the purposes of labelling leads to inconsistent application of the country of origin requirement. Misapplication and misuse of the current country of origin application was a recurrent theme, resulting in opportunities for fraudulent and misleading origin declarations.

26. Members and observers generally agreed that the country of origin for labelling purposes depends on whether processing in a second country changes the nature of the food. There was also general agreement that:

- processes such sorting, grading, and packaging would not be considered to change the nature of the food. In these cases, the country of origin would be the same as the country of harvest, even if the sorting, for example, took place in a second country.
- the following types of processes would change the nature of a food as they result in new products that fall outside of CCSC standards, with a new identity and name:
  - extraction in the case of vanilla
  - addition of ingredients to vanilla bean to produce vanilla extracts, syrups or concentrates
  - blends of different spices that result in a new food (a spice mixture)

27. Despite significant agreement on “change of nature” as outlined above, CL responses revealed that there were mixed views on whether the following processes would change the nature of a food, including:

- drying
- fermentation (in the case of vanilla).
- grinding - this process was recognized by most respondents as a change to physical characteristics, while there were differing views on whether this is considered a change in nature

28. The EWG consultation summarized these conclusions from the CL and then asked questions to confirm, to ensure the report would accurately reflect where there were areas of agreement on change of

nature and where there were not. In response to the EWG consultation, members agreed overall that the above reflects where there is agreement on change of nature and where there are differing views. There was also broad agreement by EWG members that a consistent understanding of “change in nature” is key to resolving related labelling discussions, ensuring consistent application of origin labelling in the GSLPF (CXS-1-1985), and would support more consistent decision-making by CCSCH.

29. Given the overall agreement of EWG members on the relevance of “change in nature” to clarifying labelling provisions, the EWG then proposed options to achieve this. Options provided included CCFL developing additional guidance about what would change the nature of the food and therefore the country of origin for the purposes of labelling or CCFL providing advice to CCSCH to support the development of guidance within its texts. Additional options or ideas were also requested.

30. There were mixed views on how to best clarify “change of nature”. Some supported the development of general guidance by CCFL applicable to all foods. Others cautioned that this may unnecessarily broaden the scope of the work, have unintended consequences on other commodities, and instead suggested that CCSCH and other commodity committees have the expertise on the processes that affect those specific commodities and their nature. Some suggested a hybrid approach that reflects each Committee’s expertise and avoids conflict and duplication, such as CCFL identifying general principles and labelling implications to ensure consistency with the GSLPF (CXS-1-1985), and that CCSCH defines what constitutes a “change in the nature” in the context of spices. It should be noted that some of the information confirmed through the CL and EWG already enable clarifications on whether some processing steps involve a change in nature (e.g., packaging, sorting, extracting).

31. Some members suggested that CCSCH could benefit from capacity building workshop or side events with a view to increasing understanding on horizontal Codex texts that apply to all foods. For example, a labelling workshop to present authoritative guidance on the application of CCFL texts to the issue of origin labelling in high-value spices. Other possibilities include workshops on key provisions of CCFL texts such as the GSLPF (CXS-1-1985) and the *General Guidelines on Claims* (CXG 1-1979), as well as CCFICS texts such as guidance on traceability and food fraud. One member recalled the usefulness of similar sessions provided by the Codex Secretariat on CCFA texts within commodity committees.

32. One member suggested that CCFL could provide targeted guidance from its existing texts for CCSCH to apply to the high-value spices for which there may be existing labelling issues or concerns. For example, “country of origin” is currently defined in the GSLPF (CXS-1-1985), fraudulent labelling is not permitted, and while country of harvest is not defined in CCFL texts, it can be recognized as a claim, for which CCFL already has guidance (CXG 1-1979). The EWG Chairs and Co-Chairs note that this idea may help define what CCFL’s output on this agenda item could look like.

33. Linked to the discussion on what constitutes a change of nature, the EWG consultation also provided options and sought members’ input on labelling guidance for when country of harvest is the same, or different from, country of origin. Options presented to the EWG included CCSCH defining the term “country of harvest” related to spices and culinary herbs, and CCFL providing guidance on labelling when country of harvest is the same as, or different from, country of origin.

34. Views were split on the need to define the term “country of harvest”. Several EWG members indicated that they do not consider this necessary, because “harvest” is already defined, the term is already used throughout CCSCH standards, and there is a general understanding of its meaning. Several others suggested it would be useful to define the term. One member pointed out that the meaning of country of harvest is not the issue, but rather a common understanding of when the country of origin is no longer the country of harvest.

35. EWG members had varying comments on whether there is value in CCFL providing guidance on labelling when country of harvest is different from country of origin. Some believe this is where guidance could be helpful in distinguishing between the two, while others pointed out that such products would be ones that have undergone a change in nature and in such cases the application of section 4.5.2 of the GSLPF would be clear.

36. Many members supported the idea of CCFL providing more clarity around labelling when the country of harvest and country of origin of a spice or culinary herb are the same. Some went on to specify that when the country of harvest and origin coincide, one label declaration would suffice, e.g. “Product of (naming the country)”. EWG members also provided examples of this situation: one explained that saffron is a highly perishable commodity, and drying must take place immediately after harvest; therefore, the country of origin and the country of harvest are the same, and this should be stated in the relevant standard. Another producing country explained that the key process of fermentation and drying of vanilla generally takes place in the country of harvest using traditional methods that do change the fundamental nature of the vanilla bean. There were other EWG members who did not support the option of CCFL providing guidance on labelling when country of origin and country of harvest are the same, as they viewed it as unnecessary or redundant.

37. Through the consultations, a general agreement emerged that in the case of saffron, the country of origin is the same as the country of harvest. A member proposed that this could be addressed in the dried saffron Codex standard with a footnote stating that for the purposes of labelling the country of origin is the country of harvest.

**b) Lack of specificity in Codex texts regarding blends of spices of the same type from different origins**

38. Comments to the CL indicated that blending of a single spice from multiple countries presents unique considerations regarding origin labelling. For example, a single pre-packaged product of dried saffron could be made up of saffron originating in two countries. Responses suggested this is an area prone to fraudulent activity or misleading origin labelling, as sometimes such products are sold as a single-origin product.

39. Building on this feedback, the EWG asked members if they thought there was sufficient Codex guidance on the labelling of a single type of spice mixed from more than one origin. Many members consider this as a gap in existing country of origin labelling texts. While some members believe that existing general requirements are sufficient or do not preclude the labelling of multiple origins when that is the case, there is a general recognition that Codex texts are not explicit about the labelling of blends of a single type of food from multiple origins. Some members pointed out that this gap applies to more foods than spices and that other single types of foods from multiple origins can be blended prior to packaging, such as honey and grains. Given this, some members suggested CCFL was best placed to address this issue broadly.

40. Based on these responses, and the previous feedback that this gap is a potential source of fraud and misleading labelling, this is an area that has potential to address some of the underlying issues driving the country of harvest discussions. Suggestions in the EWG included consideration of new work by CCFL to add specificity to the GSLPF (CXS 1-1985) on the labelling of blends of a single type of food from multiple origins, noting that this would be applicable to all foods. CCFL could also provide guidance to CCSCH on how to label such spices while remaining consistent with the GSLPF (CXS 1-1985).

41. It is important to note that for blends of different spices, for example a saffron and paprika blend, the product would not fall under the dried saffron Codex standard or other CCSCH standards. Therefore, these products are not in scope of these discussions and would be subject to the horizontal labelling requirements of the GSLPF (CXS 1-1985) as well as the *General Guidelines on Claims* (CXG 1-1979) and other applicable Codex standards.

**c) Interest by some Members in marketing based on qualities associated with origin**

42. Some comments to the CL highlighted the interest in country of harvest labelling as a means to promote products from certain desirable regions. Additional comments noted that voluntary claims and information are always an option, providing it is truthful and not misleading.

43. Based on these comments to the CL, the EWG asked members to comment on the appropriate tool to address interests in promoting foods from specific countries or regions, and to what extent this falls within the mandate of Codex.

44. Many members responded that promoting foods from specific countries, regions or heritage for economic advantage falls outside the Codex mandate, which is about food safety and fair practices in trade. These members stated that promotion of foods from certain regions fails to serve public interest and that voluntary labelling that is truthful and not misleading is the appropriate approach. Despite this, some members indicated their support for mandatory country of harvest labelling as a tool to promote foods from specific regions. Several commented that this is more closely related to the concept of Geographical Indications (GIs) or other voluntary intellectual property schemes, rather than mandatory labelling, to promote foods from specific countries or regions, and that these are better addressed by national or regional frameworks, or by international bodies other than Codex.

45. With respect to voluntary labelling of the country or region of harvest, or voluntary labelling of other information such as where a food is packaged or blended, members commented that such declarations would be subject to the *General Guidelines on Claims* (CXG 1-1979). EWG comments also highlighted that voluntary claims provide the flexibility to promote specific characteristics, growing regions or other qualities.

46. One EWG member responded that the use of GIs or similar schemes in conjunction with Codex standards on fair and accurate labelling, support the promotion of country or region-specific foods.

**Other themes**

47. In addition to the 3 key labelling issues identified in responses to the CL and EWG, a number of other topics were also discussed. These include:

- Challenges with enforcement of accurate origin labelling, stemming from factors such as inconsistent application of country of origin, lack of analytical methods to detect origin, and intentional fraud. Comments shared in the EWG generally agreed that clarifying the application of country of origin would support effective, consistent and transparent enforcement, while it would not address the issues of intentional fraud or lack of analytical methods.
- The existence of CCFICS texts that support fraud prevention, import, export and traceability, including the:
  - *Draft Guidelines on Prevention and Control of Food Fraud* (currently under development),
  - *Guidelines for Food Import Control Systems* (CXG 47-2003),
  - *Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System* (CXG 60-2006) (currently under revision),
  - *Guidelines for Design, Production, Issuance and Use of Generic Official Certificates* (CXG 38-2001),
  - *Principles for Food Import and Export Inspection and Certification* (CXG 20-1995), and the
  - *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems* (CXG 26-1997).

48. Those who responded to the EWG consultation generally recognized the distinct roles between CCFICS and CCFL, and of the value of awareness and use of all horizontal Codex texts by all members.

- The link between traceability back to origin and potential health and safety issues, when appropriate food risk management relies on traceability.

49. The EWG acknowledged these topics and the role of fraud prevention, traceability and enforcement in preventing and mitigating unfair practices in the trade of food, including the misuse of origin declarations. CCFICS texts in particular may be valuable for CCSCH to refer to when considering how Codex addresses fraud prevention and traceability more broadly. However, these topics fall outside of CCFL and will therefore not be the focus of potential options developed by CCFL.

## CONCLUSIONS:

50. As a result of comments to the CL and the EWG that explored a variety of questions, options, and considerations, the following are the key labelling issues driving discussions on country of harvest:

- Incorrect, misleading or fraudulent labelling of the origin of spices, stemming from:
  - inconsistent interpretation and application of country-of-origin labelling
  - lack of specificity in Codex texts regarding blends of spices of the same type from different origins
- The interest by some producing countries in using labelling to promote regional or country-specific qualities of spices and culinary herbs.

51. Other issues related to enforcement, fraud prevention, import and export trade, and traceability were also explored through the CL and EWG. However, as these are not specifically labelling related, they will not be the focus of CCFL's efforts. CCFL's clarifications respecting labelling will support the application of the various tools that exist in other Codex texts.

52. While there were varying suggestions on the best approaches to address the above labelling issues, there were more areas of common ground and clarity on the application of Codex labelling provisions to spices and culinary herbs that emerged through the EWG discussions. There was also a suggestion that an overarching solution to the labelling issues raised would be for CCFL to provide targeted and clear guidance to CCSCH on how existing CCFL texts, properly and authoritatively interpreted, address the issues of fraud and appropriate origin labelling, as well as consumer and producer interests related to claims. Given this, the EWG Chairs and Co-Chairs suggest that these clarifications and areas of common ground are valuable in the resolution of the above issues, and warrant reflecting here, as outlined in the following nine (9) conclusions.

- 1) CCFL is the CAC's subsidiary body established to prepare standards and related texts on food labelling and is well placed to support commodity committees to understand food labelling in general, including the horizontal labelling provisions of CCFL texts that apply to all foods. CCSCH and other commodity committees have the ability to refer items requiring labelling input to CCFL for response early in the step process, to inform the development of labelling provisions prior to seeking endorsement. As required, alternative ways for CCFL to provide guidance to commodity committees could also be explored, such as workshops held in parallel to sessions.

- 2) All labelling information, whether mandatory or voluntary, is subject to the General Principles outlined in Section 3 of the *General Standard on the Labelling of Prepackaged Foods* (CXS 1-1985), which prohibits false, misleading, and deceptive labelling. This general provision applies to mandatory country of origin labelling statements. When these General Principles are read in conjunction with the GSLPF (CXS 1-1985) country of origin requirements and commodity specific labelling requirements, it is clear that any false, misleading, or deceptive declarations of country of origin are prohibited in existing Codex texts. An example of a misleading declaration of origin that is not permitted under these provisions is the labelling of the country of packaging as the country of origin of a food when such a food is imported in its consumer ready form from a producing country into the packaging country, and no processing or production occurs in the packaging country.
- 3) Section 4.5.2 of the GSLPF (CXS 1-1985) states: “*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*”. When considering the labelling of foods, it is important to understand at what point the food came into being in the form in which it is packaged and sold to consumers, as this step determines the country of origin for the purposes of labelling. CCFL may not always have the expertise on specific processes that commodities undergo and how these may or may not result in a change of nature. However, in general, if a process results in a new and different food with a new name (as described in Section 4.1 of the GSLPF), this would likely be a change in nature. Conversely, if a process does not result in a new and different food, this would generally not be considered a change in nature. Considerable information was gathered through the CL and EWG to enable clarifications on whether some processing steps involve a change in nature - for example packaging, sorting, and grading would not be considered to change the nature of the food. These clarifications may be useful for CCSCH in considering labelling provisions going forward.
- 4) When the country of harvest and the country of origin of a spice is the same, one statement of origin is sufficient as it avoids redundancy and potential confusion and minimizes burden on industry. Dried saffron was an example provided by EWG members of a commodity for which country of harvest and country of origin are the same. In these situations, fulfilling the mandatory country of origin labelling requirement means declaring the country of harvest.
- 5) When country of origin and country of harvest of a spice or culinary herb are different, the country of origin is the country in which the change of nature occurred.

Spice and culinary herb related examples of when country of harvest and country of origin are different include vanilla beans that are harvested in one country and then processed in another country to become vanilla extract, which is a new and different food not covered by the CCSCH standard. Another example is a paella spice blend that is a mix of garlic powder and dried saffron – the blend is a new food that may be processed in a second country other than where the individual spices were harvested. In these cases, the country of origin for labelling purposes would be the country in which the processing resulted in the final product. The GSLPF (CXS 1-1985) provisions can be clearly applied in these cases, which do not involve foods subject to CCSCH standards.

- 6) The meaning of country of harvest is generally understood to be the country where a spice or culinary herb is grown and harvested. Given that “harvest” is already defined in the CCSCH glossary of terms as “the act or process of gathering agricultural crops”, and that the term has been used in several CCSCH texts, there may be limited benefit to developing a definition of country of harvest. While it would not hinder any resolution of issues, it is worth considering if it is the best use of Codex and Member resources. The root issue is not the understanding of the term, but rather the implications for labelling when country of origin and country of harvest are the same, and when they are not.
- 7) Products may exist in international trade that are blends of a single type of spice or culinary herb from multiple origins, packaged together. An example would be a package of dried saffron that contains dried saffron originating from Iran, as well as dried saffron originating from India. This may occur when spices are exported in non-retail containers from countries where they were harvested and dried, to another country where they are packaged together from all of the sources and labelled. It could also happen if a producing country imports a spice in non-retail containers, blends it with the same spice they produce, and packaged it together. In these cases, the spice or culinary herbs in the package are from multiple countries of origins, and the packaging of these spices together does not change their nature. These spices or herbs would continue to be those covered by CCSCH standards.

The existing general provisions of the GSLPF (CXS 1-1985), which, while not explicit on how to label blends of the same food from multiple origins, do not prevent the labelling of multiple countries of origin when that is the case.

- 8) In general, optional or voluntary statements or claims can be made on food labels, provided that such statements are not false or misleading. In all cases, any voluntary statements or claims are subject to

CCFL texts that apply to all foods, including the General Principles in Section 3 of the GSLPF (CXS 1-1985) which prohibits false and misleading labelling, and the *General Guidelines on Claims*, which provide further guidance. This permission to make optional statements, such as the optional declaration of country of harvest, can be stated in Codex standards, but it does not need to be specified in order for voluntary information to be provided.

- 9) Labelling provisions are established by Codex with the intent to address health and safety matters and fair practices in trade. Codex does not establish labelling requirements related to promoting food or for competitive benefit of food business operators or producing countries. Interests in promoting products based on producing country, regional characteristics, or other qualities are out of scope of CCFL's mandate. Members with interests in labelling for promotional purposes are encouraged to explore the use of voluntary labelling subject to broad labelling requirements. They may also explore other mechanisms outside of CCFL that support promotion of foods from specific regions, such as geographic indications.

#### For Consideration by CCFL:

53. As a reminder, the objectives of this EWG were to review the information gathered from the comments to the CL, and discussions at CCSCH, CCFL and CAC47 to:

- provide **potential options** which recognize Members' perspectives on the use of COH in addition to the mandatory declaration of country of origin (COO) in food labelling of spices, including saffron and vanilla;
- review **options for a definition for COH** and consider how it differs from COO;
- consider **whether any clarifications are needed** to the application of labelling provisions.

54. As a result of the CL and the EWG consultation, the Chairs and Co-Chairs therefore invite CCFL to consider the following to address the objectives of the EWG. Please note that this recommendation and related items for consideration do not comment specifically on mandatory or voluntary labelling of country of harvest, for which consensus has not been achievable and which was not the objective of the EWG.

#### RECOMMENDATION:

55. There has been much back and forth between CCSCH and CCFL on the endorsement of labelling provisions, which could potentially have been avoided by a full explanation of horizontal labelling texts and related considerations to CCSCH. This may be one reason why the endorsement of labelling provisions in CCSCH standards has not always been straightforward.

56. Through the CL and the EWG consultations, CCFL has been able to understand the key labelling issues involved in these discussions, as described under paragraph 52 in the above nine (9) conclusions. These conclusions recognize the complex issue of country of origin and country of harvest and provide clear guidance when considering commodity specific labelling. These conclusions also enable the application of other Codex texts related to fraud, traceability, and import and export trade. If CCFL shares relevant information with CCSCH, CCSCH could then use this information to review and potentially update any provisions that require CCFL endorsement.

57. With respect to the above, CCFL49 is invited to:

- a. Consider referring to CCSCH the above conclusions 1-9, which outline key labelling principles to consider when determining commodity specific labelling related to origin.
- b. Consider promoting a workshop or side session at CCSCH on CCFL labelling texts, including conclusions 1-9.
- c. Noting conclusion 3, consider if this information offers sufficient guidance on what constitutes a "change of nature" of a food, and therefore the country of origin for the purposes of labelling.
- d. Noting conclusion 6 that summarizes EWG members' understanding of the meaning of country of harvest, conclude that if country of harvest is to be defined, CCFL is not the suitable Codex body to do so.
- e. Noting conclusion 7, consider exploring possible work to clarify the labelling of blends of a single spice from multiple origins. An interested Member could prepare a proposal for inclusion in the Agenda Item on Future Work.
- f. Consider whether the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the *Standard for dried floral parts – saffron* (CXS 351-2022), and if so, provide any specific text proposals.



**APPENDIX I****SUMMARY OF REPLIES TO CL 2025/07-FL: REQUEST FOR INFORMATION ON  
THE USE OF “COUNTRY OF HARVEST” IN THE LABELLING OF SPICES****Key Issues identified from CL 2025/07-FL:**

Detailed information was gathered on a broad range of elements related to this issue. In general, there was broad agreement on the importance of transparency, traceability, fraud prevention, consumer information, accurate labelling and consistency with the *General standard for the labelling of pre-packaged foods* (CXS 1-1985).

Members and Observers generally agreed that country of harvest refers to where the spice was grown and harvested, and the country of origin for labelling purposes depends on whether processing in a second country changes the nature of the food. However, there were different interpretations and views of the processes that change the nature of spices. Respondents generally agreed that processes such as sorting and packaging do not change the nature of spices, meaning the country of origin would remain the same as the country of harvest, even if the packaging took place in a second country. There was also overall consensus that extraction, fermentation, addition of ingredients to produce vanilla extracts or syrups, and blending different spices into mixtures were considered substantial transformations (changes of nature) that create new products outside CCSCH standards. Processes such as grinding generated mixed views on whether these processes change the nature.

Many respondents noted that the varying interpretations and views on the processes that change the nature of the food (and therefore the country of origin) for the purposes of labelling lead to inconsistent application of the country of origin requirement. Respondents highlighted that misleading origin labelling often occurs when spices undergo minimal processing in another country and are then labelled as originating from that country. Other examples provided of fraudulent or misleading practices included blending spices from multiple origins without disclosing all of the origins on the label, exploiting trade routes and customs codes, using vague or misleading labels, and substituting high-value spices with lower-quality or synthetic alternatives. Members commented that these practices mislead consumers, harm genuine producers, and create unfair competition. Fraudulent origin declarations are common for high-value spices like saffron and vanilla, exploiting consumer preferences for certain origins.

Detecting such fraud is challenging due to the high cost of analytical testing, complex supply chains, lack of validated methods, and limited oversight. Inspection and enforcement activities rely primarily on documentation such as certificates of origin, customs records, and invoices, along with traceability checks, physical inspections, and occasional lab testing. Many authorities commented on the limited resources to conduct in-depth verification, particularly for online sales.

Concerns about mandatory COH labelling were widely expressed. Many respondents believe that CXS 1-1985 already provides sufficient guidance through COO provisions based on substantial transformation, and that introducing mandatory COH would be redundant, confusing, and inconsistent with Codex principles. Mandatory COH could set a precedent for unnecessary labelling requirements, increase compliance costs, create trade barriers, and fail to address the root problem of fraudulent origin declarations. It was also noted that mandatory COH would add little value for consumers, as COH and COO are often the same for spices covered by CCSCH standards. Negative impacts shared by respondents included increased costs, complexity, consumer confusion, trade disruptions, increased fraud if COH claims are unverifiable, and concern that frequent label changes could lead to waste and environmental impacts.

Some respondents supported mandatory COH labelling, suggesting it would improve transparency, traceability, authenticity, fair competition, and fraud prevention, as well as support for cultural heritage preservation and local economies particularly for vanilla, which is considered unique due to its post-harvest processing methods that vary by country and influence quality.

Many respondents supported voluntary COH labelling, particularly for high-value spices, as a marketing tool rather than a requirement.

Some respondents pointed to the existence of CCFICS texts that support fraud prevention, trade, and enforcement, including the *Draft Guidelines on Prevention and Control of Food Fraud* (currently under development), *Guidelines for Food Import Control Systems* (CAC/GL 47-2003), and *Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System* (CAC/GL 60-2006) (currently under revision).

**APPENDIX II****LIST OF EWG PARTICIPANTS**

<b>Countries</b>	<b>NGOs / Observer Organizations</b>
Australia	FoodDrinkEurope
Belgium	Food Industry Asia
Brazil	International Organisation of Spice Trade Association
Canada	Confederation of Indian Industry
China	Hellenic Food Authority (EFET)
Costa Rica	
Egypt	
Greece	
European Union	
Ghana	
India	
Indonesia	
Iran	
Italy	
Japan	
Madagascar	
New Zealand	
Republic of Korea	
Saudi Arabia	
Singapore	
Sénégal	
Thailand	
Uganda	
United Kingdom	
United States of America	
Uruguay	