

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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COMMENTS FROM JAMAICA

Agenda item 2.1:

CX/FL 26/49/2 Add.1 - The use of “country of harvest” in addition to the mandatory declaration of country of origin in food labelling of spices

Introduction

Jamaica submits this Conference Room Document to set out its position on proposals to use “country of harvest” as an alternative or additional mandatory origin declaration alongside the established Codex concept of “country of origin”.

Jamaica does not support a mandatory or parallel “country of harvest” declaration. Jamaica considers that existing Codex provisions on country of origin labelling provide a sufficiently robust framework and should remain the primary reference for origin claims.

Discussion

1. Country of origin and substantial transformation

Jamaica’s understanding is that country of origin should continue to be determined by where a food was wholly obtained or where the last substantial transformation occurred, consistent with long-standing Codex principles. For globally traded commodities such as herbs and spices, introducing a separate “country of harvest” concept risks regulatory ambiguity and consumer confusion.

- Products (including herbs and spices) may be subject to value-adding operations (e.g. cleaning, drying, extraction, blending) in a country other than where the raw agricultural material was harvested.
- Where such operations constitute substantial transformation—resulting in a change in the nature or characteristics of the product—the country in which that substantial transformation occurs may be considered the country of origin, consistent with Codex principles.
- Where no substantial transformation occurs, the harvest country should not be displaced or obscured by alternative origin terminology.

2. Concerns with introducing “country of harvest”

Jamaica is concerned that introducing “country of harvest” as a separate or mandatory declaration could:

- undermine the clarity and legal certainty of existing origin labelling rules;
- create inconsistencies with WTO-aligned concepts of substantial transformation;
- increase compliance and enforcement burdens, including for developing countries and Small Island Developing States (SIDS); and
- enable misleading practices where minimal processing may mask the true agricultural source of the product.

These outcomes would run counter to the objectives of consumer protection, fair trading practices, and transparency in food labelling.

3. Consumer protection and trade considerations

From a consumer perspective, Jamaica emphasizes that origin information must be meaningful, accurate, and not misleading. Multiplying origin terms without clear differentiation risks confusing consumers rather than enhancing informed choice. From a trade perspective, divergent or overlapping origin concepts may increase compliance costs and create avoidable barriers to trade.

Proposed recommendations

Jamaica invites CCFL49 to consider the following:

- retain **country of origin** as the primary origin declaration in Codex texts and guidance;
- apply origin determinations using the concept of **substantial transformation** and other established Codex principles, rather than introducing a separate mandatory “country of harvest” declaration; and
- avoid creating additional mandatory origin terminology where it does not provide a clear consumer protection or public health benefit.

This approach preserves regulatory coherence, supports consumer understanding, and safeguards the interests of agricultural producers and exporters, including those in developing economies.

Agenda item 7:

CX/FL 26/49/7 – Application of Food Labelling Provisions in Emergencies

Justification

Jamaica is pleased to submit comments on the development of the draft Guidelines on the Application of Food Labelling Provisions in Emergencies. As a Small Island Developing State (SIDS), Jamaica remains highly vulnerable to external shocks which include geopolitical conflicts, natural disasters such as hurricanes, earthquakes, flooding, landslides and climate-related supply chain disruptions which regularly create emergency conditions that strain national food systems. These vulnerabilities underscore the importance of clear, harmonized guidance on labelling flexibilities that safeguard consumer health while maintaining fair trade practices.

1. Purpose and Scope

Jamaica supports the development of high-level, non-technical principles to guide competent authorities in determining appropriate labelling flexibilities during emergencies. Such guidance is especially relevant for countries like Jamaica that face recurrent hurricane seasons, where rapid mobilization of food supplies is critical to national response efforts.

2. Domestic vs. Export Context

Jamaica agrees that labelling exemptions applied domestically during emergencies should not extend to food products destined for export markets unless the importing country expressly agrees. This protects the integrity of international food trade and ensures transparency and trust among trading partners.

3. Protection of Vulnerable Populations

Emergency situations frequently amplify risks to vulnerable groups, including infants, young children, the elderly, and persons with chronic illnesses. Jamaica emphasizes that any labelling flexibilities must not compromise essential health and nutrition information. Foods for infants and young children must continue to comply with Codex provisions and the WHO International Code of Marketing of Breast-Milk Substitutes.

4. Preventing the Distribution of Substandard Foods

As disasters often create urgent demand for food imports, Jamaica stresses the importance of preventing the introduction of substandard or unsuitable foods into emergency-affected markets. All imported emergency food supplies should comply with Codex safety, quality standards and overall food safety regulations to avoid the risk of food dumping, especially in SIDS and disaster-prone regions.

5. Communication Requirements

Jamaica supports the inclusion of mandatory communication measures to ensure consumers have access to critical ingredient, allergen, and safety information even when labelling flexibilities are applied. Alternative communication modalities—such as digital notices, public advisories, or temporary supplementary labels—should be emphasized. In circumstances where vulnerable populations have been disconnected from normal channels of communication during a disaster, governments must implement risk based strategies to address this situation.

6. Nutrition and Broader Health Considerations

Natural disasters significantly disrupt nutrition security, and emergency feeding programmes must guard against nutritional deficiencies. Jamaica recommends explicit recognition that emergency labelling guidance should not only protect food safety but also support nutritional adequacy and public health outcomes.

7. Priority Requirements vs non-priority requirements

Jamaica believes that certain labelling specifications such as brand name, net weight, country of origin can be exempted. However, date marks such as lot numbers or date of manufacture, expiry dates, ingredient listings,

allergen declaration, precautionary allergen labelling, health claims and nutritional fact panels must be mandatory.

Jamaica remains committed to supporting the EWG's work and looks forward to engaging collaboratively with Members and Observers during CCFL49.

Agenda item 8:

CX/FL 26/49/7 – Guiding definition for uniform application of labelling provisions to “small packages” and related exemptions in existing Codex texts

1. Introduction

Jamaica welcomes the opportunity to contribute to CCFL discussions on developing a Codex-based guiding definition for “small packages” (also referred to as small packaging/packs), as proposed in the ICGA discussion paper.

Jamaica notes that the lack of a harmonized Codex guiding definition has driven divergent national practices—especially for exemptions from mandatory nutrition labelling and front-of-pack nutrition labelling (FOPNL)—affecting consumer understanding, regulatory certainty, and trade, including for SIDS.

This issue is particularly relevant given Jamaica's market structure: many micro, small and medium-sized operators; widespread single-serve/low-unit-cost formats; and strong reliance on imported pre-packaged foods.

2. National Context

In Jamaica, small packages are used to improve affordability and access—particularly for vulnerable populations—and are common for confectionery, seasonings, beverages, snack foods, condiments, and culinary ingredients.

Size constraints can make it difficult to present mandatory particulars (including nutrition information) on-pack without reducing legibility—especially in informal and semi-formal retail settings where these formats are prevalent.

National labelling provisions are largely aligned with Codex (including CXS 1-1985 and CXG 2-1985). However, in the absence of Codex guidance, interpretation of “small packages” for nutrition-labelling exemptions requires national discretion.

3. Distinction between “Small Units” and “Small Packages”

Jamaica stresses a clear distinction between “small units” (CXS 1-1985, Section 6) and “small packages” (CXG 2-1985, Section 3.1.2) to avoid inconsistent application of exemptions.

Jamaica supports retaining the existing “small units” definition (largest surface area < 10 cm²) unchanged and outside the scope of the proposed work.

Absent a guiding definition for “small packages”, these concepts are often conflated in national and regional implementation.

4. Rationale for a CODEX Guiding Definition

Jamaica supports new Codex work to develop a guiding definition for “small packages” to help competent authorities apply exemptions from nutrition labelling and FOPNL consistently and proportionately.

From Jamaica's perspective, Codex guidance should:

- Recognize physical space limitations as a key determinant;
- Allow flexibility for national circumstances (e.g., market size and consumer purchasing patterns);
- Reduce unnecessary technical barriers to trade and support fair practices;
- Promote consumer protection by encouraging alternative ways to provide nutrition information where full on-pack labelling is not feasible.

Such guidance would also support implementation of Codex texts on e-commerce and modern information technologies (CXG 104-2024; CXG 105-2024).

5. Elements for Consideration in a Guiding Definition

A Codex guiding definition for “small packages” could consider, inter alia:

- Package surface area, clarifying whether this is the largest surface or total printable area;
- Thresholds that may differ from those for “small units”;
- Legibility requirements as a functional criterion; and

- Clear linkage to the specific exemptions concerned (e.g., nutrition declaration, FOPNL).

Guidance should also encourage alternative access to nutrition information for foods sold in small packages (e.g., digital or point-of-sale solutions), where appropriate.

6. Position on Future Work

Jamaica supports commencing new work on a guiding definition for “small packages”, provided that:

- It remains clearly distinct from existing provisions on “small units”;
- It is non-prescriptive and adaptable to national contexts; and
- It proceeds through inclusive consultation with Members and Observers.

Jamaica would welcome participating in information-gathering and supports establishing an electronic working group to advance the task.

7. Conclusion

Developing a Codex guiding definition for “small packages” is a timely opportunity to enhance harmonization, strengthen regulatory clarity, and support consumer protection and fair trade—particularly for developing countries and SIDS.

Jamaica encourages CCFL to advance this work in line with Codex principles and national implementation realities.