

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CODEX COMMITTEE ON FOOD LABELLING

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THE USE OF "COUNTRY OF HARVEST" IN ADDITION TO THE MANDATORY DECLARATION OF COUNTRY OF ORIGIN IN FOOD LABELLING OF SPICES

Comments in reply to CL 2026/28-FL

Submitted by:

*Argentina, Australia, Brazil, Canada, Colombia, Costa Rica, Egypt, European Union, Gambia, Guatemala,
Indonesia, Iran, Iraq, Malaysia, Malaysia, Morocco, New Zealand, Panama, Peru, Qatar, Sudan, Tunisia,
United Arab Emirates. United Kingdom, United States of America, Zambia*

Background

This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2026/28-FL¹ issued in March 2026. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCFL>

ANNEX

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Australia would like to thank the EWG Chairs Canada and Iran and Co-chairs India and Madagascar for producing a detailed analysis of issues related to country of harvest labelling in its report (CX/FL 26/49/2 Add.1). Australia's answers to the specific questions are below.	Australia
<p>Brazil thanks Canada, Iran, India and Madagascar for their constructive work as Chair and Co-Chairs of the electronic working group, and for the clear and balanced report prepared for CCFL49.</p> <p>In Brazil's view, the report appropriately reflects that the core issue is not the absence of mandatory COH labelling, but rather the need for a more consistent understanding and application of existing Codex provisions on country of origin (COO), particularly in relation to what constitutes a "change in the nature" of a food.</p> <p>Brazil's comments on the specific questions raised in CL 2026/28-FL are provided below.</p>	Brazil
Malaysia would like to thank Canada and Iran for chairing the Electronic Working Group on 'The Use of "Country of Harvest" In Addition to the Mandatory Declaration of Country of Origin in Food Labelling of Spices'.	Malaysia
<p>ENGLISH</p> <p>Panama thanks the Secretariat and the electronic working group for the preparation of document CX/FL 26/49/2 Add.1, as well as for the detailed analysis provided on the issues of country of origin and country of harvest.</p> <p>With regard to the questions raised, we consider that the indication of the country of origin should be maintained as a mandatory requirement, as it constitutes an essential element of consumer information and contributes to transparency in international food trade.</p> <p>However, concerning the country of harvest, we consider that its inclusion as a mandatory requirement presents technical and operational challenges that warrant further analysis. In particular:</p> <p>In products such as spices, international trade often involves multiple sources of raw materials, blending, and consolidation processes along the supply chain.</p> <p>The variability in sourcing, which may change depending on seasonal availability or market conditions, makes it difficult to ensure precise and continuous traceability of the country of harvest.</p> <p>In some cases, the final product may result from blends of harvests originating from different countries, raising questions as to how this information can be declared in a clear, verifiable, and non-misleading manner.</p> <p>The requirement to declare the country of harvest could impose additional burdens on operators, particularly small and medium-sized enterprises, without necessarily providing a proportional benefit to consumers.</p> <p>In this regard, the delegation considers that the concept of country of harvest still presents grey areas in its practical application, particularly in categories such as spices and dried plant products, where the main divergences arise.</p> <p>Therefore, we believe that this issue requires further technical discussion within Codex, with a view to:</p> <ul style="list-style-type: none"> - Clarifying definitions and scope; - Assessing its applicability depending on the type of product; - Analyzing its impact on trade and on consumer information. <p>Consequently, we support that these matters continue to be discussed before considering any decision on their mandatory application.</p>	Panama

COMMENT	MEMBER / OBSERVER
<p><u>SPANISH</u></p> <p>Panamá agradece a la Secretaría y al grupo de trabajo electrónico por la elaboración del documento CX/FL 26/49/2 Add.1, así como por el análisis detallado presentado en relación con el país de origen y el país de cosecha.</p> <p>En relación con las cuestiones planteadas, consideramos que la indicación del país de origen debe mantenerse como un requisito obligatorio, en la medida en que constituye un elemento esencial de información para el consumidor y contribuye a la transparencia en el comercio internacional de alimentos.</p> <p>No obstante, respecto al país de cosecha, estimamos que su inclusión como requisito obligatorio presenta desafíos técnicos y operativos que ameritan un análisis más profundo. En particular:</p> <p>En productos como las especias, el comercio internacional suele involucrar múltiples orígenes de materia prima, mezclas y procesos de consolidación a lo largo de la cadena de suministro.</p> <p>La variabilidad en las fuentes de abastecimiento, que puede cambiar según la disponibilidad estacional o condiciones del mercado, dificulta la trazabilidad precisa y continua del país de cosecha.</p> <p>En algunos casos, el producto final puede ser el resultado de mezclas de cosechas provenientes de distintos países, lo que plantea interrogantes sobre cómo declarar esta información de manera clara, verificable y no engañosa.</p> <p>La exigencia de declarar el país de cosecha podría generar cargas adicionales para operadores, especialmente pequeñas y medianas empresas, sin necesariamente aportar un beneficio proporcional al consumidor.</p> <p>En este sentido, la delegación considera que el concepto de país de cosecha aún presenta zonas grises en su aplicación práctica, particularmente en categorías como especias y productos vegetales secos, donde se originan las principales divergencias.</p> <p>Por lo tanto, estimamos que este tema requiere mayor discusión técnica en el ámbito del Codex, con miras a:</p> <ul style="list-style-type: none"> - Clarificar definiciones y alcances; - Evaluar su aplicabilidad según tipo de producto; - Analizar su impacto en el comercio y en la información al consumidor. <p>En consecuencia, apoyamos que estas cuestiones continúen siendo debatidas antes de considerar cualquier decisión sobre su obligatoriedad.</p>	
<p>Introduction</p> <p>Zambia expresses its appreciation to the Codex Committee on Food Labelling (CCFL), the Codex Committee on Spices and Culinary Herbs (CCSCH), and the Electronic Working Group (EWG) for the extensive work undertaken to clarify labelling provisions relating to country of origin and country of harvest for spices and culinary herbs.</p> <p>Zambia recognizes that the discussions have highlighted both areas of divergence and convergence, and welcomes the nine (9) conclusions as a practical basis for resolving outstanding issues.</p> <p>General Position</p> <p>Zambia supports the view that existing Codex texts, particularly the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), provide a sufficient and robust framework for addressing labelling issues, including those related to:</p> <ul style="list-style-type: none"> • Country of origin • Prevention of misleading or deceptive practices • Consumer protection and fair trade 	<p>Zambia</p>

COMMENT	MEMBER / OBSERVER
<p>Zambia emphasizes the importance of maintaining the horizontal nature of CCFL texts, and encourages commodity committees such as CCSCH to rely on these provisions when developing commodity-specific standards.</p> <p>Application of Codex Principles</p> <p><u>Prevention of Misleading Labelling</u></p> <p>Zambia strongly supports the application of Section 3 of CXS 1-1985, which prohibits false, misleading, or deceptive labelling.</p> <p>In this regard, Zambia underscores that:</p> <ul style="list-style-type: none"> • The declaration of a country of packaging as the country of origin, where no change in nature has occurred, is misleading and should not be permitted • Existing Codex provisions are adequate to address fraud-related concerns. <p><u>Country of Origin and Change of Nature</u></p> <p>Zambia supports the interpretation of Section 4.5.2 of CXS 1-1985, whereby:</p> <ul style="list-style-type: none"> • The country of origin is the country where a food undergoes processing that results in a change in nature • Processes such as sorting, grading, drying, and packaging do not constitute a change in nature • Where processing results in a new and different product, the country where such processing occurs becomes the country of origin. <p><u>Country of Harvest</u></p> <p>Zambia considers that the meaning of country of harvest is generally well understood as the country where the product is grown and collected and further definition of this term is not necessary, and Codex resources should instead focus on practical application.</p> <p><u>Single and Multiple Origin Declarations</u></p> <p>Zambia supports a pragmatic approach where country of harvest and country of origin are the same, a single declaration is sufficient where products originate from multiple countries, multiple countries of origin may be declared.</p> <p><u>Voluntary Labelling</u></p> <p>Zambia supports the principle that additional information, such as country of harvest, may be provided on a voluntary basis and that such information must comply with Codex provisions and must not be misleading. Zambia further emphasizes that Codex labelling provisions should not be used for promotional purposes, as this falls outside the mandate of CCFL</p> <p><u>Institutional Coordination</u></p> <p>Zambia supports strengthened collaboration between CCFL and CCSCH, including:</p> <ul style="list-style-type: none"> • Early referral of labelling issues to CCFL during the standards development process • Provision of technical guidance and capacity building • Consideration of workshops or side events to enhance understanding of horizontal labelling provisions <p>Conclusion</p> <p>Zambia reiterates its support for the application of existing Codex labelling provisions, avoidance of duplication and over-prescription and strengthened collaboration between CCFL and CCSCH. Zambia is confident that the proposed approach ensures clarity, consistency, and alignment with Codex principles, while facilitating fair trade and protecting consumers.</p>	

COMMENT	MEMBER / OBSERVER
<p>Zambia supports the referral of Conclusions 1-9 to the Codex Committee on Spices and Culinary Herbs, as they provide a balanced and practical framework for commodity-specific origin labelling, promoting clarity, consistency, and transparency across international trade.</p> <p>Zambia wishes to emphasize that Country of Origin (COO) should be mandatory. Clear origin labelling is fundamental to consumer trust, traceability, and fair competition. It ensures that consumers are properly informed and that producers particularly in developing regions receive appropriate recognition in global markets. In this regard, mandatory COO is not only consistent with the principles of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), but also critical for maintaining confidence and integrity in international food trade.</p> <p>At the same time, Zambia strongly encourages that Country of Harvest (COH) remain voluntary. While informative in certain contexts, making COH mandatory could impose significant technical and administrative burdens, especially in complex or multi-origin supply chains. This risks creating unnecessary barriers to trade, disproportionately affecting developing countries, without delivering clear added value to consumers. A voluntary approach therefore strikes a more appropriate balance between transparency and practicality.</p> <p>On the issue of “change of nature,” Zambia considers that Conclusion 3 already provides sufficient and workable guidance. The distinction between processes that create a new and distinct product and routine handling processes is both clear and implementable, and does not require further elaboration.</p> <p>Zambia also supports strengthened collaboration between the Codex Committee on Food Labelling and CCSCH, including through a dedicated workshop or side event, to promote a shared, science-based understanding of horizontal labelling provisions.</p>	

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
<p>(i) Paragraph 52 of CX/FL 26/49/2 Add.1 outlines conclusions 1-9 which provide further detail relevant to the question of country of origin and country of harvest. If CCFL shares this information with CCSCH, CCSCH could then use this information when developing commodity specific labelling provisions related to origin. Do you agree with this approach?</p>	
<p>Argentina acompaña la mayoría de las conclusiones arribadas en el documento CX/FL 26/49/2.</p>	<p>Argentina</p>
<p>Yes. Australia supports the conclusions outlined at Paragraph 52 of CX/FL 26/49/2 Add.1, and supports CCSCH referring to this information to develop commodity specific labelling provisions in future.</p>	<p>Australia</p>
<p>Yes. Brazil agrees with this approach. The conclusions summarized in paragraph 52 provide a useful set of guiding principles that can support CCSCH in the development or revision of commodity-specific origin-labelling provisions for spices and culinary herbs.</p> <p>In Brazil's view, this approach is consistent with the complementary roles of CCFL and CCSCH. The CCFL is responsible for identifying the relevant labelling principles and implications under the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), while CCSCH is best placed to address the technical specificities of spices and culinary herbs and to consider how such principles should be reflected in commodity texts.</p> <p>Brazil considers that this approach may contribute to greater consistency across Codex texts, facilitate more harmonized interpretation by Members, and reduce recurring difficulties in the endorsement of labelling provisions.</p> <p>At the same time, Brazil considers that conclusions 1-9 should be understood as guiding principles to support CCSCH, and not as an exhaustive or horizontal interpretation applicable to all foods irrespective of the technical context. Clarification of what constitutes</p>	<p>Brazil</p>

COMMENT	MEMBER / OBSERVER
a “change in the nature” of a spice should continue to rely on the technical expertise of CCSCH, with support from CCFL regarding the related labelling implications.	
<p>Canada supports this approach. The nine conclusions in Paragraph 52 summarize key labelling concepts explored by CCFL as part of the EWG on this topic (e.g., “change of nature,” voluntary vs mandatory information, implications for blends) and reflect CCFL’s expertise in food labelling. Sharing these conclusions with CCSCH would help promote consistent interpretation of labelling provisions in general and origin labelling provisions specifically, support CCSCH in developing commodity specific labelling provisions that align with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and other CCFL texts, and could reduce future issues related to the endorsement of labelling provisions in CCSCH texts.</p> <p>Canada believes that sharing these conclusions with CCSCH, together with informational workshops, would be beneficial.</p> <p>Canada’s assessment is that the root cause of this issue is inconsistent application of existing origin labelling requirements. This will not be solved with additional mandatory requirements, but through deeper understanding of existing requirements and how they apply to specific commodities. We believe that sharing these conclusions with CCSCH will provide the foundation for CCSCH to interpret and implement origin provisions consistently.</p>	Canada
Estamos de acuerdo con las conclusiones a las que llegó el GTE y su remisión al CCSCH	Colombia
Costa Rica considera apropiado que las conclusiones 1 a 9 se compartan con el CCSCH como un insumo técnico de referencia, en la medida en que permiten aclarar la interpretación y aplicación de las disposiciones horizontales sobre etiquetado, en particular la relación entre país de origen, cambio en la naturaleza del alimento y país de cosecha.	Costa Rica
<p>YES, Egypt agrees with this approach.</p> <p>In addition, we would like to clarify the following:</p> <ol style="list-style-type: none"> 1. Some domestic legislation specifies the regulatory bodies responsible for imported food control, such as radiation monitoring and agricultural quarantine, which are primarily based on the country of harvest and origin. 2. The location of harvest and production determines the potential for exposure to contaminants. 3. The quality of agricultural crops (including spices such as saffron and vanilla) is closely linked to the conditions under which they are grown and harvested in their natural environment. 4. Knowing the country of harvest and production enhances transparency in trade and other practices, which is reflected in consumer confidence. <p>In summary, it is essential and mandatory to clearly state both the country of harvest and the country of origin in the required declarations. This is a logical approach that promotes transparency, fair practices, and credibility in trade, and reduces deceptive trading practices.</p>	Egypt
Yes, the European Union (EU) agrees with this approach. However, some of these conclusions should be revised as outlined below.	European Union
<p>The Gambia supports sharing Conclusions 1-9 with CCSCH.</p> <p>These conclusions offer a useful and well-balanced set of guiding principles on origin labelling, including how to interpret country of origin (COO), the relevance of “change of nature,” and the role of country of harvest (COH) as additional information.</p> <p>Providing this material to CCSCH would help: promote greater consistency across commodity standards, reduce differing interpretations among Members, and reinforce the application of Codex provisions on truthful and non-misleading labelling, in line with CXS 1-1985.</p>	Gambia
Guatemala indica que está de acuerdo en las conclusiones indicadas 1 a 9, sin embargo, se manifiesta la preocupación que estas conclusiones sean abordadas en otro tipo de productos, ya que la composición de una mezcla de especias o una especia es diferente a	Guatemala

COMMENT	MEMBER / OBSERVER
otro tipo de productos, por lo que se debe dejar claro que estos comentarios están enfocados específicamente para este tipo de productos.	
<p>Indonesia appreciates the work undertaken in CX/FL 26/49/2 Add.1, particularly the conclusions outlined in paragraph 52, which provide useful clarification on country of origin and country of harvest.</p> <p>Indonesia considers that sharing these conclusions with CCSCH would enhance harmonization between horizontal labelling provisions and commodity-specific standards, thereby improving clarity and consistency in the application of country of origin and country of harvest declarations.</p> <ul style="list-style-type: none"> - Harvest: according to CCSCH glossary of terms as “the act or process of gathering agricultural crops”. - The meaning of country of harvest is generally understood to be the country where a spice or culinary herb is grown and harvested - 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 - Changes in nature : 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. Packaging, sorting, and grading would not be considered to change the nature of the food. - 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. - 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. - In the case of a commodity for which the country of harvest and the country of origin are the same. In these situations, fulfilling the mandatory country of origin labelling requirement means declaring the country of harvest. - 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. <p>For example:</p> <ul style="list-style-type: none"> - a vanilla beans that are harvested in one country and then processed in another country to become vanilla extract, the COO is another country (vanilla extract is not covered by the CCSCH standard) - 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. (not covered by the CCSCH standard) 	Indonesia
<p>Iran concurs that sharing conclusions 1–9 from paragraph 52 of CX/FL 26/49/2 Add.1 between CCFL and CCSCH is a logical step. This facilitates the development of coherent, commodity-specific labeling provisions related to origin. Such an approach is crucial for products like spices, where processing can significantly alter the perception of origin and where current definitional gaps lead to inconsistent regulatory application.</p> <p>To maximize the benefit of this exchange, the shared conclusions should actively support the formulation of:</p> <ul style="list-style-type: none"> • A precise, science-based definition for “Change in the nature of food,” especially as it applies to spices and other minimally processed agricultural goods. 	Iran

COMMENT	MEMBER / OBSERVER
<ul style="list-style-type: none"> • Clear distinctions between Country of Harvest (COH) and Country of Origin (COO), ensuring that the consumer understands both the agricultural provenance and the location of significant transformation. • Practical criteria and examples to guide the application of these concepts, which would assist regulators in implementing labeling requirements uniformly across different product types and processing levels. 	
yes	Iraq
Malaysia can agree with this approach. Conclusions 1 through 9 provide clear guidance that addresses the complex issue of country of origin versus country of harvest. Sharing these conclusions will equip the Codex Committee on Spices and Culinary Herbs (CCSCH) with the necessary principles to review and potentially update labelling provisions to spices and culinary herbs.	Malaysia
Oui, le Maroc approuve la transmission des conclusions 1 à 9 au CCSCH.	Morocco
New Zealand supports referring the conclusions 1-9 to CCSCH. We consider the conclusions offer excellent clarity on the application of the labelling provisions in the General Standard for the labelling of prepackaged food (CXS 1-1985) to the labelling of COO for spices.	New Zealand
<p>Si, se está de acuerdo en que el Comité sobre Etiquetado de los Alimentos (CCFL) comparta las conclusiones con el Comité sobre Especies y Hierbas Culinarias (CCSCH), en tanto dichas conclusiones se constituyen como información técnica relevante y transversal para el desarrollo de disposiciones específicas de etiquetado.</p> <p>No obstante, se considera importante que dicho análisis sea utilizado para evaluar la pertinencia del “país de cosecha” como información adicional de carácter voluntario, asegurando coherencia con los principios generales del Codex y evitando la introducción de requisitos obligatorios que puedan resultar innecesarios.</p>	Peru
yes	Qatar
je ne suis pas totalement d'accord avec cette approche.	Tunisia
Yes, the UK is supportive of this approach, but a number of the conclusions need to be amended, as detailed below.	United Kingdom
The United States participated in the EWG and supports the progress made in the EWG. The United States agrees with the EWG's assessment 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 identified by Members. In general, the United States is of the view that conclusions 1-9 accomplish this objective. We support sharing the information outlined in these conclusions with CCSCH and believe that this information will be beneficial to CCSCH when the committee develops commodity-specific labelling provisions.	USA
Zambia supports the sharing of information with CCSCH in order to guide an settle outstanding issues with regards to labelling of saffron in terms of country of Origin and Country of Harvest	Zambia
(ii) If yes, do you support CCFL49 endorsing these conclusions?	
<p>Argentina acompaña la mayoría de las conclusiones arribadas en el documento CX/FL 26/49/2.</p> <p>No obstante, desea reforzar los siguientes conceptos:</p> <ul style="list-style-type: none"> - Se refuerza la obligatoriedad de declarar el país de origen, ya establecida en la NGEAP. - El CCSCH ya contempla la definición de país de cosecha, con lo cual no sería necesario definirla. - La NGEAP en su sección 3 establece de forma bien clara los criterios generales para el etiquetado de alimentos, considerando primordial que no deben describirse ni 	Argentina

COMMENT	MEMBER / OBSERVER
<p>presentarse con una etiqueta o etiquetado en una forma que sea falsa, equívoca o engañosa, o susceptible de crear en modo alguno una impresión errónea respecto de su naturaleza en ningún aspecto.</p> <p>Estas definiciones también aplicarían a la declaración facultativa respecto del país de cosecha de hierbas y especias, en el caso que se optara por declararlo. Asimismo, se comparte el entendimiento de que los intereses relacionados con la promoción de productos en función del país de origen, las características regionales u otras cualidades quedan fuera del mandato del CCFL, debiendo enfocarse especialmente sobre cuestiones relacionadas con la salud y la inocuidad de los alimentos.</p> <p>Sumado a ello, las normas de hierbas y especias establecen las distintas presentaciones de producto a las que se les aplica la misma norma Codex, sin que por ello cambie el país de origen. En el caso de los filamentos, filamentos cortados, molidos para el azafrán seco; vainas enteras, partidas, cortadas, pulpa y semillas de vainilla, molidas/en polvo, todas ellas bajo el nombre común de “vainilla”; o el caso de las semillas secas enteras con cáscara, enteras sin cáscara, semillas fragmentadas, molidas, para la “nuez moscada”. Todos estos procesos o formas de presentación no alteran el país de origen del producto.</p> <p>Asimismo, el fraude no siempre puede evitarse con un reglamento, en ocasiones es el control, la trazabilidad documental y la denuncia lo que permite disuadir a quienes cometen actos de competencia desleal, fraude y engaño al consumidor.</p> <ul style="list-style-type: none"> - Podría evaluarse la posibilidad de utilizar la declaración de forma voluntaria del “país de cosecha” con el objetivo de dar más claridad en algunos casos puntuales. - No se apoya la necesidad de enumerar los tipos de procesos que cambian la naturaleza de los alimentos, entendiendo que es muy complejo definirlo y varía según el tipo de alimento y el tipo de proceso aplicado. - Se apoya la necesidad de evaluar con mayor profundidad como debería procederse en los casos de mezclas de especias. <p>Por último, se desea expresar con cierta preocupación las posibles consecuencias que pueda tener la definición de este tema. Entendiendo que resulta importante considerar que, si bien es un tema que surgió en el ámbito del comité de especias y hierbas culinarias su definición puede –y es probable- que se extrapole a otros productos más allá de las hierbas.</p>	
Yes, Australia endorses the conclusions set out at CX/FL 26/49/2 Add.1.	Australia
<p>Yes. Brazil supports CCFL49 endorsing conclusions 1–9, as they provide a useful and balanced basis for advancing this work.</p> <p>Brazil considers that these conclusions can help promote greater consistency in the interpretation and application of existing Codex provisions on origin labelling, while supporting CCSCH in the development of commodity-specific provisions for spices and culinary herbs.</p> <p>Brazil notes that these conclusions should be understood as guiding principles for this work and that their endorsement should not be interpreted as support for new mandatory COH labelling requirements.</p>	Brazil
Canada supports CCFL49 endorsing conclusions 1–9 in paragraph 52 of the EWG Report. The conclusions accurately summarize areas of common understanding reached in the EWG and clarify the interpretation and application of Codex labelling provisions. Endorsing them would establish useful reference material that would equip CCSCH with consistent, practical guidance.	Canada
<p>Apoyamos la posibilidad planteada, atendiendo lo señalado en la conclusión 1.</p> <p>teniendo en cuenta la conclusión 3, considere si esta información ofrece orientación suficiente sobre lo que constituye un “cambio en la naturaleza” de un alimento y, por lo tanto, el país de origen para los fines del etiquetado; Rta. Consideramos que la información aportada al respecto es general y que de requerirse mayor especificidad sería competencia del CCSCH, dado que es posible que CCFL no siempre cuente con los conocimientos</p>	Colombia

COMMENT	MEMBER / OBSERVER
<p>especializados sobre los procesos específicos a los que se someten los productos y sobre cómo estos pueden o no dar lugar a un cambio en su naturaleza.</p> <p>teniendo en cuenta la conclusión 6, que resume la interpretación de los miembros del GTe del significado de “país de cosecha”, determine que, si fuera necesario definir dicho concepto, el CCFL no es el órgano del Codex adecuado para hacerlo; Rta. Estamos de acuerdo.</p> <p>teniendo en cuenta la conclusión 7, estudie la posibilidad de emprender un trabajo para aclarar el etiquetado de las mezclas de una misma especia procedente de múltiples orígenes. Cualquier miembro interesado podría elaborar una propuesta para incluirla en el punto de la agenda sobre los trabajos futuros; Rta. Si bien no nos oponemos al inicio de un nuevo trabajo al respecto, no representa una prioridad para nosotros.</p>	
Costa Rica apoya.	Costa Rica
YES, Egypt supports CCFL49 endorsing these conclusions.	Egypt
<p>In general, the EU supports the conclusions with the exception of conclusion 9, with the following remarks and additions:</p> <p>Conclusion 2): In the first sentence it is stressed that the General Principles in Section 3 of the General Standard for the Labelling of Prepackaged Foods (CXS 1 – 1985) (GSLPF) apply to all labelling information, be it mandatory or voluntary. In line with this, the EU suggests adding “also” in the second sentence: “This general provision applies also to mandatory country of labelling statements”.</p> <p>Conclusion 3) states that “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”. The EU calls for caution on the words used and to stick as far as possible to the wording in existing Codex provisions to avoid any misinterpretation. Indeed, a food can have a different “form” without a change of “its nature” (e.g. a fruit that is cut in slices). The EU therefore proposes the following redrafting: “When considering the labelling of foods, it is important to understand at what point the food underwent processing which changed its nature before being packaged and sold to consumers, as this step determines the country of origin for the purposes of labelling.” The EU would also suggest deleting the following sentences “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” since there are processes that result in a new and different food with a new name without a change in nature (e.g.: a sliced fruit usually entails in its name that it is sliced i.e. an appropriate descriptive term that is not misleading or confusing as provided for in sub-section 4.1.1.3 of the GSLPF).</p> <p>Conclusion 4) states “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.”</p> <p>The EU agrees with the paragraph above. Yet, for total clarity and to avoid ambiguity when the country of harvest and the county of origin of a spice is the same, this equivalence should be explicitly stated in the Codex standard for the spice in question; e.g. a provision clarifying that the country of origin shall correspond to the country of harvest should be included in the saffron standard.</p> <p>Conclusion 5) states “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.” However, it lists only examples where the processing results in (different) foods that are not covered by CCSCH standards (e.g. vanilla extract or spice blends from different spices). The EU suggests therefore replacing these examples by examples where the processing (in another country where the spice was harvested) results in a food that is covered by CCSCH standards, where the indication of the country of harvest, in addition to the country of origin,</p>	European Union

COMMENT	MEMBER / OBSERVER
<p>could be mandatory. For example, vanilla may undergo processes in countries other than where it was harvested. Several of these processes change the nature of the vanilla, meaning that the country of origin differs in these cases from the country of harvest. However, since important qualities of the product are linked to the country where it was grown, this information may also be important for the consumer. In addition, the last sentence ("The GSLPF (CXS 1-1985) provisions can be clearly applied in these cases, which do not involve foods subject to CCSCH standards") should consequently be deleted.</p> <p>Conclusion 6): It is correct 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. However, the inclusion of a new entry defining "country of harvest" in the glossary of terms could reduce ambiguity based on the above definition.</p> <p>Conclusion 7): The EU does not authorise the blending of Saffron from different origins. In the case of a spice or a culinary herb for which blends of different origins are authorised and the indication of the country of origin is mandatory according to the CCSCH standard, all the countries of origin should be labelled in line with the General Principles in section 3.1 of the GSLPF ("Pre-packaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect"). This conclusion should be modified accordingly.</p>	
<p>The Gambia supports the endorsement of Conclusions 1-9 by CCFL49.</p> <p>The conclusions reflect substantial convergence of views and remain grounded in existing Codex texts. They provide clear and workable direction for addressing origin labelling issues without adding unnecessary layers of complexity. Their endorsement would also facilitate better alignment between CCFL and CCSCH, contributing to a more efficient standard-setting process.</p>	Gambia
<p>Guatemala indica que está de acuerdo en ratificarlas, sin embargo, dejamos presente la preocupación que este tema de establecer país de origen pueda emigrarse para otros productos, que puedan dar lugar a una confusión.</p>	Guatemala
<p>Indonesia supports CCFL49 endorsing the conclusions outlined in paragraph 52 of CX/FL 26/49/2 Add.1, as they provide useful clarification on country of origin and country of harvest.</p> <p>Indonesia further considers that endorsing these conclusions would provide practical guidance to Members and industry in applying origin-related labelling requirements in a consistent manner.</p>	Indonesia
<p>Iran supports CCFL49 endorsing these conclusions, provided their interpretation and application pave the way for:</p> <ol style="list-style-type: none"> 1. COH as the primary agricultural location: COH must unequivocally refer to the country where the raw agricultural or biological material was cultivated, harvested, or collected. 2. COO tied to substantial transformation: COO should consistently signify the country where the final product undergoes its last significant processing or transformation, leading to a change in the food's nature. 3. Tiered labeling logic: Labeling requirements must be harmonized across raw agricultural products, minimally processed ingredients, and composed products (e.g., spice blends). This should align with established horizontal labeling principles where appropriate, ensuring transparency regarding the origin of key components. <p>Iran suggests that the endorsement also include a directive for drafting groups to incorporate illustrative examples and decision-making criteria, particularly for common processing steps like grinding, milling, drying, blending.</p>	Iran
<p>yea</p>	Iraq
<p>Subject to discussion at CCFL49, Malaysia has no objection if CCFL49 endorsing these conclusions.</p>	Malaysia

COMMENT	MEMBER / OBSERVER
Oui, le CCFL49 doit confirmer formellement les 9 conclusions, accompagnées d'une note précisant qu'elles constituent des orientations d'interprétation, non des modifications de la CXS 1-1985.	Morocco
Yes, New Zealand can support CCFL endorsing conclusions 1-9	New Zealand
<p>Si, se apoya la ratificación de las conclusiones por parte del CCFL, en la medida en que reflejan un análisis técnico basado en evidencia y consideran tanto los aspectos regulatorios como limitaciones técnicas y operativas asociadas al uso del “país de cosecha”.</p> <p>En particular, del análisis del documento en las conclusiones se observa que existen limitaciones conceptuales y operativas que dificultan la implementación del uso de “país de cosecha” como requisito obligatorio, por lo que debería evaluarse como información adicional de carácter voluntario, en línea con los principios de claridad, no inducción a error y proporcionalidad.</p>	Peru
Yes	Qatar
YES	Sudan
Oui mais avec des informations complémentaires.	Tunisia
<p>The UAE agrees with sharing the conclusions outlined in paragraph 52 with CCSCH, as they provide useful clarification on the application of country-of-origin provisions, the concept of “change in nature”, and the relationship between country of origin and country of harvest.</p> <p>These conclusions contribute to improving consistency in the interpretation and application of existing Codex texts.</p>	United Arab Emirates
<p>Overall, the UK supports the conclusions, except for conclusion 9, and makes the following comments and additions:</p> <p>Conclusion 2: The UK suggests the following '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' is replaced with: 'All labelling information, including on origin labelling statements (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.'</p> <p>Conclusion 3: Where it states that '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' the UK considers that the terminology used should remain closely aligned with existing Codex provisions to avoid ambiguity or unintended interpretation. In the UK's view, a food may undergo changes in presentation or processing without this necessarily amounting to a change in its underlying nature.</p> <p>Conclusion 4: The UK agrees with this conclusion; however, to avoid any ambiguity in its application, the UK considers that Codex commodity standards could make this equivalence explicit where relevant. For example, where the country of harvest and the country of origin will always be the same, that can be noted in the text.</p> <p>Conclusion 5: States “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.” We must ensure that the examples following this, where they set out instances where further processing creates a new food and thus can convey a new origin, are examples that are still within the remit of CCSCH standards. It is for the CCSCH to decide, on a case-by-case basis, where country of harvest would be needed in addition to country of origin for certain herbs and spices.</p>	United Kingdom

COMMENT	MEMBER / OBSERVER
<p>Conclusion 7: The paper indicates but it not explicit on the treatment of blends from multiple origins of the same spice or culinary herb. It is the UK's view that where the country of origin is given under the CCSCH standard, all countries of origin should be labelled in line with the General Principles set out in section 3.1 of the GSLPF ("Pre-packaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive, or is likely to create an erroneous impression regarding its character in any respect"). We hope we can reach consensus on this at CCFL49 without requiring further work.</p>	
<p>The United States appreciates the EWG chairs' efforts to address all comments received and propose a clear way forward with regard to this issue. The United States generally supports endorsing the conclusions 1-9 with a few notes on specific paragraphs (below). The United States believes that the conclusions in points 1-9, with a few minor amendments as suggested below, are sufficient for CCSCH to finalize the provisions of section 8.2 of the standard for dried floral parts – saffron (CXS 351-2022).</p> <p>The United States supports conclusions 1, 2, 4, 5, 8, and 9 as presented in the agenda paper. We also support the intent of 3, 6, and 7 with a few minor suggestions if CCFL49 were to endorse these conclusions.</p> <p>-In paragraph 3, we recommend specifying that the guidance is "from a labelling perspective" for the sentence that begins "However, in general, if a process results in a new and different food [...]" and the subsequent sentence. This change is intended to further clarify that CCFL is approaching the issues in a labelling context and not, for example, product formulation issues that would be outside of CCFL's expertise and better suited to commodity experts.</p> <p>-Regarding paragraph 6, the United States supports the conclusion that developing a definition of country of harvest would likely not add value or be beneficial to this issue. In the U.S. view, it would be useful to clarify in point 6 that CCFL would not be the appropriate Codex body to establish a definition if Codex members wished to do so, given the spice-specific nature of this issue, the fact that the term does not appear in CCFL's General Standard, and the comprehensive coverage provided by CCFL's country of origin guidance.</p> <p>-Regarding paragraph 7, the United States believes that the existing general provisions of the GSLPF not only do not prevent the labelling of multiple countries of origin in a single product but indeed can be interpreted to mean that all countries of origin shall be declared if their omission would mislead or deceive the consumer. It may be useful to provide such an interpretation in paragraph 7.</p>	USA
<p>Zambia supports endorsement of the conclusions by the Codex Committee on Food Labelling as they provide clear, practical, and consistent guidance on the application of existing Codex texts, particularly in relation to country of origin and country of harvest labelling. The conclusions reinforce that current Codex provisions are sufficient to prevent misleading practices, including fraudulent origin claims, while avoiding unnecessary new requirements. They also enhance clarity on key concepts such as "change of nature," support fair trade, and reduce regulatory burden, especially for developing countries. Furthermore, they strengthen coordination between CCFL and commodity committees such as CCSCH, ensuring a more efficient and science-based standard-setting process aligned with Codex's mandate of protecting consumer health and ensuring fair practices in food trade.</p>	Zambia
<p>(iii) If no, please provide comments on conclusions 1 through 9, including any elements you believe may be missing.</p>	
<p>- No se apoya la necesidad de incorporar una definición de país de cosecha. El CCSCH ya contempla la definición de cosecha, con lo cual no sería necesario definirla. Podría evaluarse la posibilidad de utilizar la declaración de forma voluntaria del "país de cosecha" con el objetivo de dar más claridad en algunos casos puntuales.</p> <p>- No se apoya la necesidad de enumerar los tipos de procesos que cambian la naturaleza de los alimentos, entendiendo que es muy complejo definirlo y varía según el tipo de alimento y el tipo de proceso aplicado. Por otra parte, no son los procesos que cambian la naturaleza de los productos los que importan, sino los procesos básicos que se encuentran contenidos en la misma norma de la especia o aromática los que valen, para decir si se ha</p>	Argentina

COMMENT	MEMBER / OBSERVER
<p>producido un mero cambio del país de origen dando lugar a un fraude. Todos los procesos mencionados en la propia norma sobre las formas de presentación de las hierbas y aromáticas “no constituyen un cambio sustancial” y no justifican a ningún comprador a cambiar el origen del producto, excepto cuando cambie radicalmente su naturaleza.</p> <p>- Se desea expresar con cierta precaución las posibles consecuencias que pueda tener la definición de este tema. Entendiendo que resulta importante considerar que, si bien es un tema que surgió en el ámbito del comité de especias y hierbas culinarias su definición puede –y es probable- que se extrapole a otros productos más allá de las especias.</p>	
Not applicable.	Australia
Not applicable.	Brazil
Regarding Conclusion 6 (need for COH definition): Canada agrees with the conclusion that the root issue is not the understanding of the term, and that defining “country of harvest” may not add value. In reference to item 57 (d) in CX/FL 26/49/2 Add.1, should “country of harvest” be defined, Canada agrees that CCFL is not the suitable Codex body to do so.	Canada
Conclusion 9): The EU disagrees with large parts of this conclusion and considers that it is not necessary for achieving the objectives of this exercise. For example, information on the label promoting a food or for the competitive benefit of a food business operator or a producing country or region by highlighting for instance specific characteristics or qualities is voluntary information subject to the General Principles outlined in Section 3 of the GSLPF, which prohibits false, misleading, and deceptive labelling, and therefore in the scope of CCFL’s mandate. The EU suggests the deletion of this conclusion.	European Union
<p>Not applicable.</p> <p>Nevertheless, The Gambia highlights the following elements:</p> <p>The explanation of “change of nature” in Conclusion 3 is adequate and practical, particularly in distinguishing between processes that fundamentally alter a product and those that do not.</p> <p>The clarification in Conclusion 6 reflects the widely accepted understanding of “country of harvest,” making further elaboration unnecessary at this stage.</p>	Gambia
<p>For the record, should these conclusions be further developed, it would be beneficial to ensure they explicitly address:</p> <ul style="list-style-type: none"> • The precise definition and scope of “change in the nature of food,” particularly for spices, distinguishing mere processing from fundamental alteration. • Clear guidance on when both COH and COO should be declared, and how this information should be presented to prevent consumer confusion. • The appropriate labeling treatment for composed products, such as spice blends, to reflect the harvest and origin of their significant components. 	Iran
Not applicable	Malaysia
<p>OBSERVATIONS SPÉCIFIQUES SUR CERTAINES CONCLUSIONS</p> <p>Concl. 3 Notion de « changement de nature » — §4.5.2 de la CXS 1-1985</p> <p>Le Maroc soutient la conclusion 3, qui précise que le « changement de nature » au sens du §4.5.2 correspond au moment où un procédé produit un aliment nouveau avec un nouveau nom. Le Maroc souscrit en particulier aux exemples fournis :</p> <ul style="list-style-type: none"> – Le séchage, le tri, le calibrage et l'emballage NE changent PAS la nature d'une épice — le pays d'origine reste le pays de récolte. – L'extraction (ex. extrait de vanille), l'ajout d'ingrédients et les mélanges multi-épices CHANGENT la nature du produit. – Le broyage : le Maroc note avec regret que les avis restent partagés sur ce point. Pour les producteurs africains qui broient leurs épices dans le pays de récolte, l'absence de clarification crée une incertitude juridique. Le Maroc demande que le CCSCH apporte 	Morocco

COMMENT	MEMBER / OBSERVER
<p>une clarification spécifique sur la question du broyage, sur la base des pratiques commerciales reconnues.</p> <p>Concl. 4 Lorsque COH = COO : une seule mention suffit</p> <p>Le Maroc soutient la conclusion 4. Pour le safran séché, le GTE a confirmé que le séchage s'effectue obligatoirement dans le pays de récolte — donc COH = COO systématiquement pour cette épice. Cette clarification est fondamentale pour la norme CXS 351-2022 (voir question v). Le Maroc demande que cette conclusion soit explicitement incorporée dans la norme safran par une disposition ou une note de bas de page dédiée.</p> <p>Concl. 7 Mélanges mono-épice provenant de plusieurs origines — Lacune reconnue</p> <p>Le Maroc se félicite de la reconnaissance explicite, dans la conclusion 7, de la lacune des textes Codex concernant l'étiquetage des mélanges d'une même épice provenant de plusieurs pays d'origine. Cette situation présente un risque direct de fraude pour les épices africaines de haute valeur, notamment le safran de Taliouine et la vanille de Madagascar, dont les prix élevés incitent à des pratiques de dilution.</p> <p>Le Maroc soutient la recommandation (e) du §57 — lancer de nouveaux travaux pour clarifier l'étiquetage des mélanges d'un même type d'épice provenant de plusieurs origines. Cette lacune ne concerne pas seulement les épices : le miel, les céréales et d'autres produits sont dans la même situation. Le CCFL est l'organe le mieux placé pour traiter cette question dans une perspective horizontale.</p> <p>Concl. 9 Valorisation par l'origine — Hors mandat du CCFL</p> <p>La conclusion 9 indique que le CCFL n'impose pas d'exigences d'étiquetage à des fins promotionnelles, et que les membres souhaitant valoriser leurs produits par l'origine sont encouragés à utiliser les indications géographiques (IG). Le Maroc souscrit à ce principe dans son application au CCFL.</p> <p>Le Maroc tient toutefois à préciser que sa demande d'obligation de la mention du COH pour les épices de haute valeur ne repose pas uniquement sur des motivations promotionnelles. Elle repose sur des impératifs de transparence, de traçabilité sanitaire et de lutte contre la fraude — trois objectifs qui relèvent pleinement du mandat du Codex. Le Maroc maintient donc sa position en faveur d'une indication obligatoire du COH pour les épices stratégiques.</p>	
N/A	New Zealand
Comentarios: No aplica respuesta.	Peru
<p>La conclusion 3 est basée sur la provision 4.5.2 de la norme CXS 1-1985, En effet cette provision a définie le deuxième pays d'origine et la condition de le changer sans définie le première pays d'origine. Une clarification est nécessaire?</p> <p>Aussi la provision 4.4 relative au non et l'adresse qui est obligatoire et englobe le nom de pays d'origine ou le pays de récolte s'ils sont les mêmes. cette provision est aussi très important et étroitement liée au provision de pays d'origine.</p>	Tunisia
<p>While supporting the endorsement of conclusions 1–9, the UAE would like to provide the following observations for further clarification:</p> <p><u>1. Country of Harvest (COH)</u></p> <p>The UAE notes that the use of “Country of Harvest” may benefit from further clarification within the existing Codex framework. At this stage, the UAE supports maintaining flexibility in its use, including voluntary declaration where appropriate and not misleading.</p> <p>The UAE does not support the introduction of mandatory COH requirements at this stage, pending further clarification and consideration, including potential implications for implementation and international trade.</p> <p>Mandating the declaration of the “Country of Harvest” could set a precedent for increasingly detailed origin declarations, potentially extending to additional stages such as country of slaughter, processing, packaging, etc. This trend could result in:</p>	United Arab Emirates

COMMENT	MEMBER / OBSERVER
<ul style="list-style-type: none"> - Increased operational costs for producers and exporters; - Additional administrative burden and logistical complexities throughout the supply chain; - The risk of retaliatory trade responses or the imposition of non-tariff barriers by trading partners. <p>Moreover, such a requirement may go beyond the scope of Codex standards, making it inconsistent with internationally accepted norms. This may constitute a technical barrier to trade (TBT) under WTO rules and could lead to formal trade challenges. Additionally, this could hinder global harmonization efforts in food labelling regulations and policies.</p> <p>Furthermore, requiring multiple origin declarations (e.g., “Harvested in Country A, Processed in Country B”) may create confusion among consumers. For instance, a vanilla product labelled “Harvested in Indonesia, processed in Thailand, packaged in the USA” may obscure which country’s standards primarily govern the product’s quality and safety.</p> <p><u>2. Blended Products</u></p> <p>The UAE recognizes that blends of spices from multiple origins present challenges for origin labelling. In such cases, it is important to ensure that labelling remains clear, accurate, and not misleading; and that appropriate flexibility is maintained to allow declaration of multiple origins or suitable general statements (e.g. “from multiple origins”).</p> <p><u>3. Change of Nature</u></p> <p>The UAE agrees that:</p> <ul style="list-style-type: none"> • Substantial transformation processes (e.g. extraction, blending, formulation) may change the nature of the product and therefore determine the country of origin; • Minimal processes (e.g. sorting, grading, packaging) do not change the nature of the product. <p>Further clarification in this area would support consistent application across Members.</p> <p>The UAE supports the endorsement of Paragraph 52 of CX/FL 26/49/2 Add.1 outlines conclusions 1-9, noting that they:</p> <ul style="list-style-type: none"> • Reinforce that Country of Origin (COO) remains the primary mandatory declaration; • Recognize that additional information, including country of harvest, may be provided on a voluntary basis where appropriate and not misleading. 	
<p>Conclusion 9: The UK has reservations regarding this conclusion and questions its necessity in achieving the objectives of this exercise. The types of voluntary claims being discussed would still be covered by the General Standard on the Labelling of Prepackaged Foods and are thus in the remit of CCFL. On this basis, the UK supports the deletion of this conclusion.</p>	<p>United Kingdom</p>
<p>(iv) Do you support the idea of a workshop or side session at CCSC on CCFL labelling texts, possibly held by the Codex Secretariat?</p>	
<p>Sí, totalmente, Argentina cree que la Secretaría del Codex con la asistencia del Comité de etiquetado podrían ocuparse. Quizás para mayor tranquilidad de los países que apoyan el etiquetado del país de cosecha, se debería hacer un Taller para clarificar por que el país de origen es suficiente en los casos señalados, en este sentido nos parece importante la recomendación 57 a) del documento CX/FL 26/49/2 Add1. Por otra parte, también se podría considerar evaluar con mayor profundidad como debería procederse en los casos de mezclas de especias.</p>	<p>Argentina</p>
<p>Yes. Given the considerable work on this matter in recent years, and as also noted by the Chairs in paragraph 55 of CX/FL 26/49/2 Add.1, Australia sees a workshop or side session at CCSC on CCFL labelling texts could enhance cross-committee understanding and promote more straightforward CCFL endorsement of labelling provisions in CCSC standards in future.</p>	<p>Australia</p>

COMMENT	MEMBER / OBSERVER
<p>Yes. Brazil supports the organization of a workshop or side session at CCSCH on CCFL labelling texts.</p> <p>Brazil considers that such an initiative could be very useful to improve the common understanding of horizontal Codex labelling provisions, particularly those related to country of origin, voluntary statements and claims, and the general principles of truthful and non-misleading labelling, including examples of application of these provisions related with spices and culinary herbs.</p> <p>In Brazil's view, such a workshop or side session could help prevent future interpretative difficulties between commodity committees and CCFL, promote greater coherence in the development of commodity-specific labelling provisions, and facilitate more efficient endorsement processes.</p>	Brazil
<p>Canada sees the value in such a workshop. Given the extensive back and forth between CCFL and CCSCH over COH/COO for saffron and other spices, a workshop could help build and strengthen shared understanding of CCFL's horizontal texts (GSLPF, Guidelines on Claims, etc.). It may also help CCSCH members apply labelling provisions related to origin, prevent future delays in endorsing labelling provisions, and promote consistent approaches across commodity committees. If successful, additional workshops on CCFICS texts (such as food fraud and traceability) could also be considered. Canada recalls similar sessions were provided by the Codex Secretariat on CCFA texts within commodity committees and found these to be beneficial.</p>	Canada
<p>Costa Rica apoya.</p>	Costa Rica
<p>Yes, Egypt agrees to hold a workshop if the CCSCH Committee deems it necessary, given that all requirements for the mandatory "Country of Harvest" declaration have been clarified as being of paramount importance due to numerous internationally binding considerations.</p>	Egypt
<p>Yes</p>	European Union
<p>The Gambia supports the proposal to organize a workshop or side event at CCSCH.</p> <p>Such an initiative would: enhance familiarity with horizontal labelling provisions, including COO, COH, and "change of nature," strengthen technical capacity, especially for developing countries, and encourage harmonized interpretation and application of Codex texts across committees. This would ultimately improve coherence and efficiency in the development of standards.</p>	Gambia
<p>Guatemala indica que si respalda la idea de organizar un taller o reunión paralela, con el objetivo de brindar apoyo y claridad sobre los textos del CCFL</p>	Guatemala
<p>Indonesia supports the idea of a workshop or side session at CCSCH on CCFL labelling texts, as it could facilitate better understanding among members and promote consistency in the interpretation and application of labelling provisions.</p> <p>Indonesia also considers that such a workshop or side session could provide an opportunity to share practical experiences and challenges faced by Members in implementing origin-related labelling requirements</p>	Indonesia
<p>A workshop or side session focused on CCFL labeling texts, potentially hosted by the Codex Secretariat under CCSCH, would be highly valuable. This forum should aim to:</p> <ul style="list-style-type: none"> • Harmonize understanding of key terms like "change in the nature of food." • Develop practical definitions for COH and COO that are suitable for global application. • Address implementation challenges for commodity-specific standards, drawing on concrete examples, especially for products like spices and blended seasonings. <p>Focusing on worked examples and the drafting implications of these concepts will be key to achieving tangible progress.</p>	Iran
<p>yes</p>	Iraq

COMMENT	MEMBER / OBSERVER
Malaysia supports the suggestion to have a workshop or side session at CCSCH by Codex Secretariat. This will aid CCSCH in making more consistent decisions regarding origin labelling in spices.	Malaysia
Oui, le Maroc soutient l'organisation d'un atelier ou d'une session parallèle.	Morocco
New Zealand supports the ideas of a workshop or side session at CCSCH on CCFL labelling texts. We question whether it is intended that such a session would be limited to the labelling of Country of Origin/Country of harvest or whether the intension is to cover all applicable Codex labelling texts?	New Zealand
Si, se apoya la organización de un taller o reunión paralela, en tanto constituiría un espacio técnico adecuado para: <ul style="list-style-type: none"> Profundizar en los aspectos conceptuales y operativos asociados a la diferenciación entre “país de origen” y “país de cosecha”, incluyendo su aplicación como elemento voluntario de etiquetado. Intercambiar experiencias entre miembros sobre prácticas regulatorias y desafíos de implementación. Contribuir a una mejor alineación entre comités del Codex, favoreciendo decisiones basadas en evidencia y consenso. 	Peru
YES	Sudan
Oui, j'appuie cette idée.	Tunisia
The UAE supports the consideration of capacity-building workshops or side events under CCSCH and/or CCFL.	United Arab Emirates
Yes.	United Kingdom
As proposed in the agenda paper, the United States believes a side session or workshop at CCSCH on the CCFL labelling texts would be helpful. The United States is of the view that it would be additionally beneficial for the host country and/or Chair of CCFL, who have the expertise and ability to represent the conclusions of CCFL, to speak to the application of CCFL's labelling texts, at such a workshop or side session.	USA
Zambia supports the proposal to convene a workshop or side event at the Codex Committee on Spices and Culinary Herbs on labelling led by CCFL as it would enhance understanding of horizontal labelling provisions particularly on issues such as country of origin, country of harvest, and “change of nature.” Zambia considers this a practical and cost-effective approach to strengthening coordination between committees, supporting capacity building for developing countries, and promoting consistent, science-based interpretation of Codex texts, thereby improving the efficiency and timeliness of developing and endorsing commodity standards.	Zambia
(v) Do you agree that the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the <i>Standard for dried floral parts – saffron (CXS 351-2022)</i>, and if so, please provide any specific text proposals.	
Se considera que la información recopilada podría utilizarse para incorporarse en la sección 8.2 de la Norma para partes florales secas: azafrán (CXS 351-2022). No obstante, sería importante contar con la versión final de estos textos antes de tomar una decisión en particular.	Argentina
Yes, Australia agrees that the information gathered through the EWG can be used to finalise the Standard for Dried Floral Parts – Saffron (CXS 351-2022). Australia suggests the following text for Section 8.2 of CXS 351-2022: <p>“Country of origin shall be declared.</p> <p>Country of harvest (optional).</p> <p>Region of harvest and year of harvest (optional).”</p>	Australia

COMMENT	MEMBER / OBSERVER
<p>Yes. Brazil agrees that the information gathered through the EWG can be used to finalize Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022).</p> <p>Brazil recalls that the report indicates a general understanding that, in the case of saffron, the country of origin is the same as the country of harvest. The report also concludes that, where COH and COO are the same, one declaration of origin is sufficient for mandatory labelling purposes, while additional voluntary information may be provided, as long as it is truthful and not misleading.</p> <p>In order to maintain consistency with the approach already adopted in other CCSCH standards for spices, and to preserve alignment with the existing Codex labelling framework, Brazil supports finalizing Section 8.2 using the same structure already used for other spices where country of harvest is optional.</p> <p>Brazil therefore proposes the following text for Section 8.2:</p> <p>8.2 Country of origin and country of harvest</p> <ul style="list-style-type: none"> • Country of origin shall be declared. • Country of harvest (optional). <p>Brazil considers that this wording is clear, practical, and consistent with the broader rationale emerging from the EWG discussions. It ensures the mandatory declaration of COO in accordance with CXS 1-1985, while preserving the possibility of voluntary COH declaration where relevant and appropriate, provided that such information is truthful and not misleading.</p> <p>Brazil also considers that this rationale is applicable to other standards, such as the Draft Standard for Spices Derived from Dried or Dehydrated Fruits and Berries – Requirements for Vanilla, and that there is no need to revisit it in the future, as noted in REP26/SCH.</p>	Brazil
<p>Yes, Canada agrees the EWG findings are sufficient to finalize Section 8.2. The EWG highlighted member feedback that for dried saffron, country of harvest and country of origin are the same, because drying occurs immediately after harvest and no transformation occurs afterward. Therefore, one origin declaration is sufficient, and avoids redundancy and potential confusion (Conclusion 4).</p> <p>Canada could support the text proposed in the EWG by a Member Organization for Section 8.2 of CXS 342-2021 (Saffron Origin Labelling)</p> <p>8.2 Country of origin and country of harvest</p> <ul style="list-style-type: none"> • Country of origin shall be declared*. • Region of harvest and year of harvest (optional). <p>*Footnote: For the purposes of this standard, the country of origin is the country of harvest.</p>	Canada
<p>Sí, Costa Rica está de acuerdo en usar la información del EWG para ultimar la Sección 8.2 de CXS 351-2022, en la línea de que la indicación del país de cosecha no sea obligatoria. Si se utiliza una declaración de país de cosecha, debe ser una mención voluntaria, apoyada por directrices claras que eviten declaraciones engañosas.</p>	Costa Rica
<p>Egypt proposes the clause No. 8.2 as the follow:</p> <p>8.2 Country of origin and country of harvest: (CXS 351-2022)</p> <p>8.2.1 Country of origin shall be declared.</p> <p>8.2.2 Country of harvest shall be declared.</p> <p>8.2.3 Year of harvest shall be declared.</p> <p>8.2.4 Region of harvest (optional)</p>	Egypt
<p>Due to the fact that “Dried saffron was an example provided by EWG members of a commodity for which country of harvest and country of origin are the same”, the EU suggests that this equivalence should be explicitly stated in the Standard for dried floral parts – saffron (CXS 351-2022), as a footnote in 8.2 as follows:</p>	European Union

COMMENT	MEMBER / OBSERVER
<p>8.2.1 The country of origin shall be indicated*</p> <p>8.2.2 The country of harvest – see point 8.2.1</p> <p>* for this standard the country of origin shall correspond to the country of harvest</p>	
<p>The Gambia considers that the EWG outcomes provide a sufficient basis to finalize Section 8.2 of the Standard for dried saffron (CXS 351-2022), without revisiting broader definitional issues.</p> <p>Proposed Text (The Gambia):</p> <p>8.2 Country of Origin</p> <p>8.2.1 The country of origin of saffron shall be declared in accordance with Section 4.5 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</p> <p>8.2.2 Where saffron undergoes processing in another country that results in a change in its nature, that country shall be considered the country of origin for labelling purposes.</p> <p>8.2.3 Where no change in nature occurs, including activities such as drying, sorting, grading, or packaging, the country of harvest shall be regarded as the country of origin.</p> <p>8.2.4 Origin declarations shall comply with Section 3 of CXS 1-1985 and must not be false, misleading, or deceptive. In particular, the country of packaging shall not be presented as the country of origin unless a change in nature has taken place.</p> <p>8.2.5 In cases where saffron originates from more than one country, all relevant countries of origin may be declared.</p> <p>8.2.6 The country of harvest may be indicated on a voluntary basis, provided such information is accurate and consistent with Codex labelling provisions.</p>	Gambia
<p>Indonesia agrees that the information gathered through the EWG can be used to support the finalization of the provisions of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022), as this information provides useful clarification on the interpretation of country of origin and country of harvest.</p> <p>Indonesia emphasizes the importance of maintaining consistency between the General Standard for the Labelling of Prepackaged Foods and commodity-specific standards to avoid ambiguity and unnecessary burden on industry.</p> <p>In this regard, Indonesia proposes the following text for consideration in Section 8.2:</p> <p>“The country of origin shall be declared in accordance with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985). Where saffron is harvested and is not subject to processing that changes its nature, the country of harvest may be declared as the country of origin. Where processing results in a change in the nature of the product, the country where such processing occurs shall be considered the country of origin.</p>	Indonesia
<p>Yes. The information gathered by the EWG can effectively inform the finalization of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022). This is contingent upon the information facilitating the establishment of clear, actionable provisions that distinguish between COH and COO and appropriately address the impact of processing on Saffron's identity.</p> <p>Illustrative Text Proposal for Section 8.2:</p> <p>To ensure clarity and consistency, Section 8.2 could be structured as follows:</p> <p>8.2 [Country of Harvest / Country of Origin]</p> <p>The label for saffron shall declare the Country of Harvest (COH), signifying the nation where the saffron stigmas were cultivated and harvested.</p> <p>Furthermore, if the saffron undergoes processing that results in a change in the nature of the food, the Country of Origin (COO) must be declared, indicating the country where the last substantial processing or transformation took place.</p>	Iran

COMMENT	MEMBER / OBSERVER
<p>In instances where the declared COH differs from the COO, both must be presented in a manner that avoids misleading consumers and clearly differentiates the agricultural provenance from the location of significant final processing.</p> <p>Incorporated Drafting Considerations:</p> <ul style="list-style-type: none"> • The definition of COH for saffron should be rooted in the initial harvest/gathering stage of the product. • A clear cross-reference to the overarching Codex guidance on “change in the nature of food” is essential for determining when COO declaration is necessitated by processing. • Any provisions addressing further processed or compounded saffron products should maintain this logical framework. 	
<p>Yes</p> <p>The data collected through the Electronic Working Group (EWG) provides a sufficient scientific and technical basis for finalizing the provisions of Section 8.2 of the Standard for Dried Flower Parts – Saffron (CXS 351-2022).</p> <p>This information reflects current international trade practices and laboratory analysis results.</p> <p>We agree to the use of this input in finalizing Section 8.2, with the possibility of future revisions in light of any new scientific data or relevant developments</p>	Iraq
<p>Malaysia can agree that the information gathered through the EWG provides a clear path forward for finalizing Section 8.2 of the saffron standard. In this regard, Malaysia is of the view that if this clause is deemed necessary, the CCSCH may have additional statement with regards to the statement of Country of Harvest in the Section 8.2 of the standard. It may be included either in the main text or as a footnote.</p>	Malaysia
<p>Oui, le Maroc estime que les informations du GTE sont suffisantes pour finaliser la section 8.2.</p> <p>TEXTE PROPOSÉ POUR LA SECTION 8.2 DE LA CXS 351-2022 (SAFRAN SÉCHÉ)</p> <p>8.2.1 — Pays d'origine (OBLIGATOIRE)</p> <p>Le pays d'origine doit être déclaré conformément à la Norme générale sur l'étiquetage des denrées alimentaires préemballées (CXS 1-1985), section 4.5.</p> <p>8.2.2 — Pays de récolte (OBLIGATOIRE — position du Maroc)</p> <p>Le pays de récolte doit être déclaré lorsqu'il est différent du pays d'origine. Dans le cas du safran séché, le pays d'origine étant le pays de récolte (voir note), une seule déclaration d'origine satisfait aux deux exigences.</p> <p>Le séchage, le tri, le calibrage et l'emballage ne changent pas la nature d'une épice — dans ce cas le pays d'origine est identique au pays de récolte.</p> <p>Note : Pour le safran séché (<i>Crocus sativus</i> L.), le séchage des stigmates est une opération de transformation effectuée dans le pays de récolte. Aux fins de l'étiquetage, le pays d'origine est le même que le pays de récolte. La déclaration du pays d'origine satisfait donc à l'obligation de déclarer l'origine pour le safran séché.</p> <p>8.2.3 — Mélanges de safran de plusieurs origines (NOUVEAU — recommandé par le Maroc)</p> <p>Lorsqu'un emballage contient un mélange de safran séché provenant de plusieurs pays d'origine, chaque pays d'origine doit être déclaré sur l'étiquette. L'indication des proportions relatives de chaque origine peut figurer sur l'étiquette à titre volontaire.</p>	Morocco
<p>New Zealand considers that the Information gathered through the EWG and presented in conclusions 1-9 should be adequate to enable the provisions in Section 8.2 of the Standard for dried floral parts - saffron (CXS351-2022) to be finalised. However, it will be for CCSCH to determine whether they agree.</p> <p>New Zealand supports the text at Section 8.2 stating “Country of origin shall be declared”</p> <p>We do not support stating in the Standard that declaration of COH for dried saffron is</p>	New Zealand

COMMENT	MEMBER / OBSERVER
optional, as COH would be the same as COO and stating both could cause consumer confusion.	
<p>Sí, se considera que la información recopilada puede ser útil para finalizar las disposiciones de etiquetado, siempre que:</p> <ul style="list-style-type: none"> - Se mantenga la coherencia con los principios generales del Codex. - Se respete el principio de proporcionalidad. - La eventual inclusión del “país de cosecha” se establezca como información de carácter voluntario, salvo que exista una justificación técnica clara para su obligatoriedad en este producto específico. 	Peru
Yes	Qatar
YES	Sudan
<p>Yes, The UAE supports the use of the EWG outcomes to finalize the relevant provisions, provided that the final text remains consistent with CXS 1-1985; and the provisions ensure clarity, avoid misleading information, and remain practical for implementation.</p> <p>The UAE Proposed the following Text:</p> <p>“The country of origin shall be declared in accordance with CXS 1-1985. Additional information, including the country of harvest, may be provided where appropriate and not misleading to the consumer.”</p>	United Arab Emirates
Yes, providing the CCSCH experts agree that there is no further processing stage for saffron that would be significant enough to confer origin. It is more crucial to clarify how origin is conferred and ensure consistent application of existing rules than it is to finalise this standard.	United Kingdom
Yes, the United States believes that the conclusions in points 1-9 of paragraph 52 of the EWG, with a few minor amendments as suggested, are sufficient for CCSCH to finalize the provisions of section 8.2 of the standard for dried floral parts – saffron (CXS 351-2022). The United States considers that a provision for “country of harvest” declaration is not necessary in the CXS 351-2022, and that, as concluded in the EWG, its inclusion would create redundancy, confusion, and burden on industry. If a “country of harvest” declaration were deemed necessary by CCSCH, it should only be included as an optional provision to reduce these risks.	USA
<p>Proposed Text for Section 8.2 – CXS 351-2022 (SAFFRON)</p> <p>Zambia is of the view that the conclusions of the EWG provide sufficient clarity to finalize Section 8.2 without introducing unnecessary complexity and the proposed Text may read as follows;</p> <p>8.2 Country of Origin</p> <p>8.2.1 The country of origin of saffron shall be declared in accordance with Section 4.5 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</p> <p>8.2.2 Where saffron has undergone processing in a second country that results in a change in its nature, the country in which such processing occurs shall be considered the country of origin for the purposes of labelling.</p> <p>8.2.3 Where saffron has not undergone a change in nature, including operations such as drying, sorting, grading, or packaging, the country of harvest shall be considered the country of origin.</p> <p>8.2.4 The declaration of country of origin shall not be false, misleading, or deceptive, in accordance with Section 3 of CXS 1-1985. In particular, the country of packaging shall not be declared as the country of origin unless a change in nature has occurred.</p> <p>8.2.5 Where saffron in a package originates from more than one country, all countries of origin may be declared.</p>	Zambia

COMMENT	MEMBER / OBSERVER
8.2.6 The declaration of country of harvest may be provided as voluntary information, provided that such declaration complies with Codex labelling provisions and is not misleading.	
Recommendations under paragraph 57	
<p>Brazil supports the general direction of the recommendations under paragraph 57.</p> <p>Regarding paragraph 57(c), Brazil considers that the information gathered through the EWG offers useful guidance on the application of the concept of “change in the nature” in the current context of spices and culinary herbs. However, this guidance should be understood as practical and context-specific, rather than as an exhaustive horizontal interpretation for all foods.</p> <p>Regarding paragraph 57(d), Brazil agrees that, if COH were to be defined, CCFL would not be the appropriate Codex body to do so. In Brazil’s view, the meaning of COH is already generally understood, and the main issue is not the definition of the term itself, but the consistent interpretation of its relationship with COO.</p> <p>Regarding paragraph 57(e), Brazil further supports exploring possible future work to clarify the labelling of blends of a single spice from multiple origins. Brazil considers that this is one of the areas where additional clarification could provide practical value, enhance consistency among Members, and help prevent misleading origin declarations.</p> <p>Brazil reiterates that progress on this issue is more likely to be achieved through practical clarification, better coordination between committees, and clearer application of existing Codex principles than through the creation of new mandatory labelling requirements.</p> <p>Brazil remains of the view that:</p> <ul style="list-style-type: none"> • typical post-harvest operations such as drying, cleaning, grinding, sorting, and packaging generally do not change the nature of a spice, as they do not result in a new product. • operations such as extraction or the formulation of a new product, such as vanilla extract, clearly change the nature of the original material, require a new COO and are outside the scope of SCH standards. • the 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. • clarification should be developed in a practical, evidence-based, and sector-specific manner, with CCSCH addressing the technical aspects and CCFL ensuring consistency with the overarching Codex labelling framework. • enforcement-related aspects should continue to be addressed primarily through the relevant work of CCFICS, while this work remains focused on conceptual and labelling issues; and • Codex does not establish labelling requirements related to promoting food or for competitive benefit of food business operators or producing countries. Interest in promoting products based on producing countries, regional characteristics, or other qualities are out of scope of CCFL’s mandate and could be explored with other mechanisms such as geographic indications. <p>Brazil looks forward to continued discussions at CCFL49 with a view to reaching a clear, coherent and practical outcome on this matter.</p>	Brazil
<p>Concluding Statement</p> <p>Implementing these recommendations will substantially enhance the Codex Alimentarius guidelines. They will promote greater transparency, foster consumer confidence, ensure fair trade practices, and establish a more scientifically grounded and practically applicable framework for origin and harvest labeling, particularly for spices and analogous commodities</p>	Iran
The United States also supports the recommendations in paragraph 57 of the agenda paper, except for point 57.e, as we do not see a need to explore possible work to clarify multiple-	USA

COMMENT	MEMBER / OBSERVER
<p>origin labelling in these scenarios at this time. The United States is of the view that CCFL's guidance already allows for multiple countries of origin to be declared if necessary and notes that further work or guidance on multiple country labeling is likely to be commodity specific. If necessary, additional labelling provisions to clarify multiple countries of origin labeling in the unique case of blends of a single type of spice or culinary herb could be developed by CCSCH specific to the commodity in consultation with CCFL if CCSCH determines such clarification to be needed following receipt of CCFL's guidance.</p>	