

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

Agenda Item 2.1

SCH08/CRD03
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Eighth Session

THE USE OF "COUNTRY OF HARVEST" IN THE LABELLING OF SPICES

Observation and reflections from the Chairperson of CCSCH

(Prepared by CCSCH Chairperson)

As requested by CAC47 following the discussion on the declaration of Country of harvest in labelling of spices, the Codex Secretariat issued a Circular Letter (CL) in February 2025 (CL 2025/07-FL) to Members and Observers seeking potential solutions to the use of "Country Of Harvest (COH) in food labelling of spices", recognizing the concerns that had been expressed by Codex Members. CAC47 also established an electronic working group (EWG), reporting to CCFL, to review the information gathered from the comments to the CL, and discussions at the CCSCH, CCFL and CAC47, and prepare a report to CCFL49 (May 2026). CAC47 furthermore invited CCSCH8 to also consider responses to the CL and make its own observations to CCFL49.

Document CX/SCH25/8/2 Add.1 of CCSCH8 provides a compilation of replies received in response to the CL (from 19 Member Countries, one Member organization and three Observers).

The CCSCH Chairperson in reviewing the replies has made the following observation:

Concerns expressed:

1. One of the major challenges in the spice industries, especially saffron, is fraud, and misrepresentation of the country of origin is an important aspect of such fraud, misleading consumers and undermining a level playing field for businesses.
2. Spices such as saffron and vanilla typically undergo several stages of processing (drying, grinding, extraction, and packaging) which often occur in countries other than where the raw material was originally harvested, resulting in country of origin misrepresented.
3. Economic fraud and unfair competition are evident when cheap spices are mixed with high value spices in a different country resulting in fraudulent or false origin declarations in spice labeling. Fraud concerning origin is usually accompanied by adulteration. This practice not only affects local producers who comply with quality and traceability standards, but also generates a loss of consumer confidence, damaging the credibility of the brands and the authenticity of the products.
4. Some of the examples of misrepresentation of Country of Origin given are:
 - (a) Cinnamon and Cloves produced in one country and made into powder in another country
 - (b) Spanish paprika cultivated and harvested elsewhere
 - (c) Vanilla brought to another country and processed there
5. Misrepresentation of the Country of Origin being widespread necessitates mandatory declaration of Country of Harvest.

CCSCH is reminded that:

6. Food fraud and adulteration are not labelling issues, but enforcement issues to be addressed by robust traceability systems and inspection and enforcement mechanisms.

The work of Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) may be referred in this context. CCFICS is;

- (a) currently developing the Guidelines on the Prevention and Control of Food Fraud,
 - (b) Updating The Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CXG 60-2006). This initiative includes more emphasis on traceability as a tool in fraud prevention.
7. The Glossary of Terms for SCH Standards defines
- (a) “Further Processing” as:
Activities necessary to transform spices and herbs from raw agricultural commodities into finished, ready-to-eat product for direct consumption by individuals or use by commercial enterprises including catering purposes or in formulated food products. These steps may include: Cleaning, sorting, sifting, grinding, grading, packaging into consumer ready packaging and/or, bulk containers which are intended for repacking into consumer size containers.
 - (b) “Industrial Processing” as: The application of physical or chemical processes that substantially modifies or transforms a product from its original state into other products such as the extraction of essential oils or other usable component from the spice. It excludes the blending of spices.
 - (c) It is to be noted that spice extracts and blends are outside the scope of CCSCH work.
8. Under CCSCH standards and definitions, when a spice or culinary herb has undergone Further Processing, including a change in style, these processing activities would not change the nature of the product for the purpose of origin labelling. Thus, even if further processing of dried spices or herbs occurs in a country other than the country where the product was harvested, the country of harvest remains the country of origin.

ANALYSIS AND WAY FORWARD:

9. The *General Standard for the Labelling of Pre-packaged Foods* (GSLPF) - **CXS 1-1985** states the following:
- Section 4.5: *Country of origin*
- 4.5.1: The country of origin of the food shall be declared if its omission would mislead or deceive the consumer.
- 4.5.2: 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.
10. Misleading origin labelling of spices often happens when there are different interpretations of what really changes a product’s nature and thereby the country of origin.
11. If “change in the nature of the food’ were to be clearly defined, it would not be necessary to differentiate between country of harvest and country of origin in dried or dehydrated spices and culinary herbs standards.

Taking the above into account, CCSCH8 may consider requesting the CCFL49 to clarify subsection 4.5.2, specifically with respect to “change the nature of the food” and/or to consider the possibility to further define/refine subsection 4.5.2 of CXS 1-1985 and specifically define ‘change the nature of the food’ which qualifies for the change in the country of origin for the purposes of food labelling; or provide guidance on the application of subsection 4.5.2.

CCSCH8 may also request further guidance from CCEXEC and the Commission on how CCFICS texts could be best integrated into commodity committee standards to provide for a more integrated approach to the inclusion of other fair trade related tools that can remind users of the food standards on how to address issues such as food fraud, traceability/product tracing among others.