



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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

**Agenda item 2.1**

**CX/SCH 25/8/2 Add.1**  
**August 2025**

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

**Eighth Session**

**Guwahati, Assam, India**

**13–17 October 2025**

**REQUEST FOR INFORMATION ON**  
**THE USE OF “COUNTRY OF HARVEST” IN THE LABELLING OF SPICES**

**Replies to CL 2025/07-FL**

*Replies submitted by Australia, Brazil, Canada, Chile, Colombia, Costa Rica, Egypt, European Union, Honduras, India, Iran, Madagascar, New Zealand, Saudi Arabia, Thailand, Uganda, United Arab Emirates, the United States of America (USA), Uzbekistan, Zambia and FoodDrinkEurope, International Organization of Spice Trade Associations (IOSTA), Tea & Herbal Infusions Europe (THIE)*

**Background**

1. CAC40 (2017) approved the project document for the development of the standard for saffron, and since then the following discussions and/or recommendations have been made with respect to this work. <sup>1</sup>
2. CCSCH6 (2022) agreed to forward: <sup>2</sup>
  - i. the draft Standard for dried floral parts - saffron to CAC45 for adoption at Step 8; and
  - ii. the provisions on labelling and methods of analysis to CCFL and CCMAS, respectively, for endorsement.
3. CAC45 (2022): <sup>3</sup>
  - i. adopted the Standard for dried floral parts – Saffron at Step 8,
  - ii. noted that the publication of the Standard for dried floral parts – Saffron would be subject to the endorsement of the food additives and food labelling provisions by CCFA and CCFL, respectively.
4. CCFL47 (2023) agreed to: <sup>4</sup>
  - i. endorse all the labelling provisions in the Standard for Dried Floral Parts – Saffron except the country of origin (8.3.1) and the country of harvest (8.3.2); and
  - ii. refer the above two provisions to CCSCH for reconsideration, and to request CCSCH to clarify the distinction between country of origin and country of harvest and provide the rationale why the provision for country of harvest should be mandatory and how such a declaration would be beneficial for fraud prevention.
5. CCSCH7 (2024) considered CRD26 and noted the definition for “country of origin” as contained in the *General standard for the labelling of prepackaged foods* (CX 1-1985) was generally broad and therefore applicable to all foods. CCSCH7 further noted that there was no definition in Codex for “country of harvest”. However, the glossary of terms that CCSCH had developed to facilitate its work, included a definition for the term “harvest”. Based on the above considerations, CCSCH agreed to forward the reply in Appendix II Part A to CCFL. <sup>5</sup>

<sup>1</sup> REP17/CAC, paragraph 83 and Appendix VI

<sup>2</sup> REP22/SCH, paragraph 39 and Appendix III

<sup>3</sup> REP22/CAC, paragraph 94(i) and 96

<sup>4</sup> REP23/FL, paragraph 17

<sup>5</sup> REP24/SCH, paragraph 11 and Appendix II Part A

6. CCFL48 (2024):<sup>6</sup>
  - i. agreed to endorse Section 8.3.1 Country of origin shall be declared; and
  - ii. noted that the Committee could not reach an agreement on Section 8.3.2 - the mandatory declaration of Country of harvest and was unable to endorse the provision and agreed referred the matter to CCEXEC87 and CAC47 for consideration.
7. CCEXEC87 (2024) noted that CCEXEC87 recognized the need for a solution that was inclusive, timely and resource efficient and provided recommendations to CAC47.<sup>7</sup>
8. CAC47 (2024) supported the recommendations of CCEXEC87 and:<sup>8</sup>
  - i. requested the Codex Secretariat to issue a CL to Members and Observers seeking potential solutions to the use of COH in food labelling of spices, recognizing the concerns that had been expressed by Codex Members;
  - ii. established an EWG, reporting to CCFL, jointly chaired by Iran and Canada and co-chaired by India and Madagascar, working in English and French, with the following Terms of References:
    - to review the information gathered from the comments to the CL, and discussions at CCSCH, CCFL and CAC47 to:
    - provide potential options which recognize Members' perspectives on the use of COH in addition to the mandatory declaration of COO in food labelling of spices, including saffron and vanilla;
    - review options for a definition for COH and consider how it differs from COO; and
    - consider whether any clarifications are needed to application of labelling provisions. o to prepare a report for consideration of CCFL49;
  - iii. invited CCSCH8 to also consider responses to the CL and make its own observations to CCFL49;
  - iv. strongly encouraged Codex Members to ensure that discussions in the EWG, CCSCH8 and CCFL49 be informed by all relevant interests; and
  - v. invited CCFL49 to consider issues related to the use of COH in food labelling of spices and to propose options which recognize the concerns that had been expressed by Codex Members.
9. This document compiles the replies received through the Codex Online Commenting System (OCS) in response to CL 2025/07-FL issued in February 2025 as requested by CAC47 (see paragraph 8(i) above).

## Conclusion

10. CCSCH8 is requested to consider the responses to the CL and make observations to CCFL49 as requested by CAC 47 (see paragraph 8(iii-iv) above).

---

<sup>6</sup> REP24/FL, paragraphs 35(iv) and 36

<sup>7</sup> REP24/EXEC2, paragraph 95.

<sup>8</sup> Full discussion in REP24/CAC paragraphs 182 – 189 and 190 – 196.

## Annex I

## Original comments in English and Translation into English of comments in Spanish and French

**REQUEST FOR INFORMATION ON  
THE USE OF “COUNTRY OF HARVEST” IN THE LABELLING OF SPICES**

To assist in addressing the potential solutions to the use of COH in food labelling of spices, Codex Members and Observers were requested to provide information on the following issues:

- a. Noting the content of Section 4.5 on Country of origin in the *General standard for the labelling of pre-packaged foods* (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.
- b. Experiences and examples related to inaccurate or misleading origin labelling of spices.
- c. Challenges related to fraudulent or false origin declarations on dried saffron or other spices.
- d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.
- e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.
- f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.
- g. Any other information relevant to the labelling provisions for spices including saffron and vanilla.

**GENERAL COMMENTS**

COMMENT	MEMBER/ OBSERVER
<p>The International Organisation of Spice Trade Associations (IOSTA) represents the global spice industry and is comprised of national and regional trade associations from countries that produce and use spices. IOSTA works to advance the harmonization of global regulatory standards. IOSTA is pleased to offer the following responses to Circular Letter CL 2025/07-FL “Request for Information on the Use of ‘Country of Harvest’ in the Labeling of Spices” for consideration.</p>	<p><b>IOSTA</b></p>
<p>• In the CXS-1-1985 (General Standard for the Labelling of Pre-packaged Foods), the country of harvest is not explicitly addressed. This omission raises concerns regarding transparency, particularly for unprocessed agricultural products that are either repackaged or re-exported from a secondary country, potentially undermining the principles of fair trade. It is important to differentiate between the terms “country of harvest” and “country of origin.” The term “Country of Harvest” refers to the specific nation where an agricultural product, such as crops or raw materials, is cultivated and harvested, thereby indicating the geographical location of the farming activities. Conversely, “Country of Origin” pertains to the nation where a product is manufactured, processed, or produced, which may encompass the final assembly or significant transformation of the product within that country [1]. For instance, in the labelling of spices such as saffron and vanilla, it is feasible to specify that the product was cultivated and harvested in its country of origin, while the final processing, including grinding and packaging, occurred in a different country. This practice enhances consumer transparency regarding the product’s nature and origin, thereby mitigating the risk of confusion or misleading information. Furthermore, it facilitates a clear distinction between the “country of harvest” and the “country of processing,” thereby promoting a more accurate and informative labelling system within the spice supply chain.</p> <p>In addition, agricultural products, such as saffron and vanilla, are categorized as “wholly obtained products” and do not undergo processing. These products are intended for direct consumption by consumers. In this context, it is important to recognize that the county of origin corresponds to the country where saffron is harvested.</p> <p>• One of the major challenges in the saffron and spice industries is fraud and the misrepresentation of the country of origin. For instance, there have been cases where saffron is illegally diverted to second countries and sold under those countries’ names in global markets. This type of fraud not only misleads consumers but also harms the interests of the original producers. Moreover, such practices create unfair competition by introducing</p>	<p><b>Iran</b></p>

COMMENT	MEMBER/ OBSERVER
<p>products at lower prices that do not meet the standards of the country of origin, potentially damaging the quality and reputation of trusted brands.</p> <ul style="list-style-type: none"> <li>• To ensure the accuracy of labelling related to both "country of origin" and "country of harvest" for saffron and other spices, thorough inspection and enforcement are necessary. In many countries, inspectors use various methods to verify the information on labels, including tracing product origin documentation, inspecting production and packaging processes, and conducting laboratory tests to confirm authenticity and quality. In Iran, organizations such as the National Standard Organization and the Food and Drug Administration oversee the labelling of export products. Additionally, producers of food and spices are required to have standard licenses and Health Certificate labels issued by the Food and Drug Administration, and they use export registration codes for international trade. These regulatory systems and licenses help prevent fraud and misuse in export processes and ensure that consumers receive accurate and truthful information. There are two government official certificates that is used for import of agricultural products. Phytosanitary certificate that is issued by Ministry of agriculture and could show country of harvest, and Certificate of Origin is issued by Chamber of commerce &amp; Industry that mention the country of origin.</li> </ul> <p>This issue may generate unexpected opportunities that, when addressed, have the potential to establish a favorable market characterized by significant added value.</p> <ul style="list-style-type: none"> <li>• For the labelling of specific products such as saffron and vanilla, it is essential to provide detailed and comprehensive information about all stages of production and processing. This information helps consumers ensure the authenticity and quality of the product, while also providing greater transparency regarding the various stages of production and packaging.</li> </ul> <ul style="list-style-type: none"> <li>o The mention of the country of harvest for agricultural products can have significant impacts on safety and fraud prevention. These impacts are as follows: <ul style="list-style-type: none"> <li>o Increased transparency: Specifying the country of harvest provides consumers with accurate information about the source of the product. This transparency can help them make more informed choices and avoid purchasing counterfeit or unsafe products.</li> <li>o Producer Accountability: Producers who specify the country of origin feel a greater sense of responsibility for the quality and safety of their products. This can encourage them to adhere to health and safety standards.</li> <li>o Rapid Problem Identification: In the event of health or safety issues, mentioning the country of origin can aid in quicker identification of the source of the problem. This facilitates legal tracking and corrective actions.</li> <li>o Consumer Protection: With precise information about the source of a product, consumers can defend their rights against unsafe or counterfeit products. This protection can contribute to increased public safety.</li> <li>o Development of Safety Standards: Mentioning the country of origin can help in the creation and development of international safety standards for agricultural products. These standards can lead to reduced fraud and enhanced product safety on a global scale.</li> <li>o Public Awareness: Informing consumers about the country of origin increases their awareness of potential risks associated with unsafe products. This awareness can help reduce fraud and enhance public safety.</li> </ul> </li> </ul> <p>The provision of such information can bolster consumer confidence in the product and enhance competitiveness within global markets. It serves as an effective mechanism for improving the safety of agricultural products and mitigating fraud, thereby fostering the development of a healthier and more trustworthy market. Additionally, it aids in ensuring compliance with international standards and trade regulations.</p> <ul style="list-style-type: none"> <li>• The country of harvest focuses specifically on where raw agricultural materials are sourced. This pertains to the verification processes, the quality of essential characteristics, the productivity of agricultural land, the regional climatic conditions, as well as the methodologies employed in agricultural practices and crop cultivation. This phenomenon elucidates the prominence of agricultural products from specific regions, exemplified by Brazilian coffee, Madagascar vanilla, Sri Lankan tea, among others. The country of harvest</li> </ul>	

COMMENT	MEMBER/ OBSERVER
<p>is relevant for products like fruits, vegetables, and grains, where the growing location is crucial. The country of origin encompasses a broader scope, including where the product is manufactured or significantly transformed. The country of origin applies to finished goods and can include products that may have raw materials sourced from multiple countries but are assembled or processed in one specific location. Regulations regarding labeling may require the country of origin to be disclosed, which may not always reflect the country of harvest if processing occurs elsewhere. Regarding quality and Safety, each country may have specific standards for the production and processing of agricultural products. By mentioning the country of origin, it becomes easier to assess the quality and safety of products and prevent the entry of substandard or contaminated items.</p> <p>In summary, while both terms relate to geographic origins, "country of harvest" is specific to agricultural production, whereas "country of origin" pertains to the overall production or manufacturing location of a product [1]. Furthermore, agricultural products, including saffron, are classified as "wholly obtained products" since these products are meant for direct consumption by end-users, it essential to acknowledge that where the product is harvested and cultivated.</p> <p>The country of origin plays a crucial role in the assessment of customs tariffs and legal obligations. The tariff classification, commonly referred to as the Harmonized System (HS) Code, assigned to different products is generally influenced by the country of origin and can have a substantial impact on the costs associated with importation and exportation.</p> <p>Reference:</p> <p>1. Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme. Food Labelling (Codex Alimentarius), Fifth Edition. FAO, Rome. Includes standards and guidelines adopted up to 2007.</p>	
<p>Madagascar respectfully calls on Codex Members to support the mandatory inclusion of the "Country of Harvest" in the labelling of vanilla. This measure is fair, consistent with the principles of standard CXS 1-1985, and essential to protect producers, enhance consumers' trust, and ensure the integrity of international trade in spices.</p>	<b>Madagascar</b>
<p>New Zealand acknowledges that the taste and quality of dried saffron can differ dependent on the country in which the saffron is grown. We also acknowledge that the high value of saffron may be leading to the incorrect (potentially fraudulent) use of Country of Origin Labelling. However, New Zealand does not agree that Codex requiring mandatory country of harvest in addition to mandatory country of origin is the appropriate action to address what we understand to be fraudulent use of Country of Origin Labelling.</p>	<b>New Zealand</b>
<p>Uganda acknowledges the potential benefits of "country of harvest" (COH) labelling in promoting transparency and heritage. However, making it mandatory poses challenges, particularly for low and middle income countries where spices are mainly grown. These include limited capacity for verification, increased compliance costs, and inconsistencies with current Codex Standards, particularly CXS 1-1985, especially when spices are processed and transformed after harvest.</p> <p>Uganda is also concerned that mandatory COH labelling could set a precedent for other food categories, increasing regulatory burdens. In cases of blended or transitioning spice sources, it may cause labelling complications. Therefore, Uganda recommends that COH labelling remain optional, at the discretion of the food business operator, as long as it does not mislead consumers.</p>	<b>Uganda</b>
<ul style="list-style-type: none"> <li>Spices such as saffron and vanilla typically undergo several stages (drying, grinding, extraction, and packaging) which often occur in countries other than where the raw material was originally harvested. As a result, the declared "Country of Origin" on the final product label may need to reflect the country where substantial transformation takes place, thus requiring a clear differentiation between "Country of Harvest" and "Country of Origin." For Examples:</li> </ul> <p>- Vanilla beans harvested in Country A that are cured or extracted in Country B.</p>	<b>United Arab Emirates</b>

COMMENT	MEMBER/ OBSERVER
<ul style="list-style-type: none"> <li>- Saffron threads harvested in Country A and subsequently dried, processed, or packaged in another country.</li> <li>• There have been observed instances where saffron is imported from a particular country, repackaged domestically or in another country, and then re-labelled with a different country as the declared country of origin. Such practices raise concerns about accuracy and can mislead consumers regarding the true origin of the product.</li> <li>• The spice sector continues to face substantial challenges related to false or misleading declarations of origin, especially in: <ul style="list-style-type: none"> <li>- Cases of saffron adulteration where the country of origin is misrepresented on the label.</li> <li>- Claims of “pure” vanilla products when synthetic vanilla is added or when beans are sourced from a different origin than what is declared.</li> </ul> </li> </ul> <p>These practices undermine consumer trust and pose serious regulatory enforcement difficulties.</p> <ul style="list-style-type: none"> <li>• Currently, verification of the "Country of Origin" (COO) is carried out using documentation such as customs declarations, certificates of origin, and packaging records. The UAE regulations explicitly require the country of origin to be clearly declared on the product label without misleading the consumer.</li> <li>• In The term of “country of harvest” could be also accepted by the competent authority as the “country of origin”.</li> <li>• While there is no current mandatory requirement to declare the "Country of Harvest" for saffron, the relevant UAE technical regulations do require the declaration of the harvest year in addition to the country of origin on the label, for purposes related to food safety and traceability.</li> <li>• 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: <ul style="list-style-type: none"> <li>- Increased operational costs for producers and exporters.</li> <li>- Additional administrative burden and logistical complexities throughout the supply chain.</li> <li>- The risk of retaliatory trade responses or the imposition of non-tariff barriers by trading partners.</li> </ul> </li> <li>• 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.</li> <li>• 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.</li> <li>• Positive Impacts: <ul style="list-style-type: none"> <li>- Enhances transparency in product sourcing and helps mitigate fraud in premium spice markets, such as saffron and vanilla.</li> <li>- Improves traceability, particularly in addressing pesticide residue issues or contamination events.</li> <li>- Provides clarity to consumers who are increasingly interested in knowing both the cultivation (harvest) and processing origins of their food products.</li> </ul> </li> <li>• Negative Impacts: <ul style="list-style-type: none"> <li>- May create a barrier to trade, particularly in the case of blended or repackaged spice products, unless globally harmonized requirements are established.</li> </ul> </li> </ul>	



COMMENT	MEMBER/ OBSERVER
<ul style="list-style-type: none"> <li>- Could impose additional regulatory and operational burdens on exporters, complicating cross-border trade.</li> <li>• If “Country of Harvest” is to become a mandatory labelling requirement in the future for spices such as saffron and vanilla, then similar labelling obligations should be extended to other primary food commodities, including raw plant materials, to ensure regulatory consistency across product categories.</li> <li>• It is also recommended that the “Year of Harvest” be included alongside the “Country of Harvest” on the label. This would contribute significantly to traceability and food safety monitoring, especially for products with longer shelf lives.</li> <li>• Furthermore, any such labelling proposals should be formally circulated to Codex Members and Observers for review and comments before adoption, to promote international alignment and avoid potential trade disruptions.</li> </ul>	
<p>The United States appreciates the opportunity to respond to the Circular Letter 2025/07-FL requesting information on the use of “country of harvest” in the food labelling of spices. The United States is deeply concerned that a mandatory “country of harvest” declaration on spices would enable unfair trading practices, create trade barriers, and undermine Codex’s science-based approach to standard setting. Codex should rely on the existing “country of origin” labelling system, which is proven, is fair, avoids duplication and confusion, and is consistent with globally harmonized labelling rules (i.e. the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985). Introducing a mandatory country-of-harvest labelling provision for spices risks jeopardizing the harmonized approach and allowing unfair advantages for certain producing countries over others, directly undermining Codex’s mandate.</p> <p>The United States has detailed below the reasons why establishing mandatory country of harvest for spices, specifically, but any commodity, generally, in Codex would introduce vulnerabilities and risks in the relevant international standards and would open the door to significant consequences for international trade, inspection, and certification. Mandatory “country of harvest” labelling in Codex would establish several dangerous precedents, also detailed below.</p> <p>The United States looks forward to participating in the Electronic Working Group prior to the 49th Session of CCFL with a view toward addressing whether country-of-origin labelling is misused or incorrectly applied in spices and developing solutions to ensure the needs and concerns of producing countries are suitably addressed.</p>	<b>USA</b>
<p>Zambia opposes the inclusion of the "country of harvest" as a mandatory labelling requirement in the standard for saffron. This requirement could introduce unnecessary trade barriers and economic inefficiencies without delivering tangible benefits in terms of food safety or fraud prevention. This requirement lacks economic, regulatory, or trade justification, and its unintended consequences could have far-reaching implications for producers, exporters, and global supply chains—particularly in developing economies. The "country of harvest" requirement only offers selective benefits for some perceived premium, single-origin commodities. However, for bulk and multi-origin exports, it poses serious risks in terms of trade barriers, compliance costs, and market distortions.</p> <p>1. The “Country of Origin” Requirement Already Ensures Transparency</p> <p>The "country of origin" label already provides consumers and regulators with necessary traceability and supply chain transparency. The addition of "country of harvest" is redundant and does not enhance food safety, fraud prevention, or consumer protection.</p> <p>2. Unjustified Trade and Economic Burdens for Developing Countries</p> <p>Mandating "country of harvest" would introduce significant compliance costs and trade complexities, including:</p> <p>Increased Administrative and Certification Costs – Producers would need to establish additional costly traceability systems, verification processes, and third-party certifications, which disproportionately affect smallholder farmers and SMEs.</p>	<b>Zambia</b>

COMMENT	MEMBER/ OBSERVER
<p>Disruption of Supply Chains – Many agricultural commodities, undergo multi-country processing and packaging before export. Requiring harvest-specific labelling could lead to misalignment with existing global trade practices and force costly supply chain restructuring.</p> <p>3. Risk of Setting a Precedent for Non-Tariff Barriers (NTBs)</p> <p>This proposal risks creating a dangerous precedent where other agricultural products could face similar unnecessary labelling requirements. If applied broadly, this could:</p> <p>Encourage protectionist policies where labelling is used as a trade restriction tool rather than a consumer protection measure.</p> <p>create barriers to market participation by imposing arbitrary and fragmented regulatory requirements that disproportionately benefit certain regions while disadvantaging others.</p> <p>4. No Economic or Market Justification for this Requirement</p> <p>From an economic standpoint, this requirement offers no value proposition but imposes considerable costs. It does not improve market efficiency, or fraud detection. Instead, it:</p> <p>will complicate trade by creating additional regulatory burdens that contradict efforts to facilitate trade.</p> <p>Fails to serve any clear public interest, instead it prioritizes commercial or geographical advantages for select players.</p> <p>5. Zambia's position: Upholding Fair Trade and Equitable Market Access</p> <p>Zambia rejects the inclusion of "country of harvest" as a labelling requirement for saffron. The Codex Alimentarius standards should remain focused on food safety, fair trade, and consumer protection—not serve as instruments for trade distortion. The proposal is an unjustified trade barrier that will disproportionately harm certain economies, particularly small-scale producers and exporters.</p> <p>In summary the Zambia's position against use of country of harvest is based on the following:</p> <ul style="list-style-type: none"> <li>· Redundant and Unjustified: The "country of origin" label already provides sufficient traceability.</li> <li>· Creates Trade Barriers: It will disproportionately burden countries by increasing compliance costs and market access challenges.</li> <li>· Sets a Risky Precedent: It could expand non-tariff barriers, harming agricultural trade globally.</li> <li>· Fails to Serve Consumer Interests: There is no proven link to fraud prevention or food safety.</li> </ul>	



<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
<p>Australia is not aware of a scenario where processing may change the nature (substantially transform) of spices (including the saffron and vanilla) which might require changes to the “country of origin” for the purposes of labelling. If spices had undergone processing that changes their nature, they would no longer meet the basic definitions of the products under the respective commodity standard (or draft standard in the case of vanilla), which all generally state in the scope section that the standard relates to the spice for direct consumption, use as an ingredient, or repackaging if required, and does not include product intended for industrial processing.</p>	<b>Australia</b>
<p>In the case of spices, including saffron and vanilla, determining the country of origin for the purposes of food labelling under Section 4.5 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) can be complex, particularly when products are harvested in one country and further processed in another.</p> <p>A key distinction must be made between the country of harvest, where the spice is cultivated and collected, and the country of origin, which may, in certain circumstances, be considered the country where the product undergoes substantial transformation.</p> <p>However, what constitutes substantial transformation depends on the nature of the processing and the intended use of the origin information. For the purpose of applying the Codex standard, the primary consideration should be that origin labelling is transparent and not misleading to consumers. In this context, operations typically applied to spices, such as drying, grinding, or packaging should not be considered substantial transformations and would not justify changing the declared country of origin.</p> <p>For example, if vanilla beans are harvested in one country and subsequently dried, sorted, ground, or packaged in another, such operations do not alter the essential nature of the product. From a consumer information perspective, these steps typically do not justify a change in the declared country of origin. In these cases, the country of harvest should remain the country of origin on the label.</p> <p>However, if vanilla is processed into a new product, such as natural vanilla extract, this constitutes a substantial transformation that results in a change of origin for labelling purposes. It should be noted that such derived products may fall outside the scope of Codex standards for spices and culinary herbs.</p> <p>Additionally, even minimal handling operations such as drying or packaging may affect product quality and safety when conducted under poor conditions, potentially introducing contamination. These concerns, however, relate to food safety and quality, rather than to the determination of the country of origin.</p> <p>Given the diversity of processing practices and regulatory interpretations across countries, further guidance from CCSCCH may be beneficial to promote clarity and consistency in the application of origin labelling for spices, considering the types of processing typically applied to these products and covered under their respective Codex standards, while aligning with consumer expectations and supporting fair international trade.</p>	<b>Brazil</b>
<p>The General Standard for the Labelling of Prepackaged Foods (GSLPF) (CXS 1-1985), which applies to all prepackaged foods, sets clear criteria on Country of Origin as follows:</p> <p>4.5 Country of origin</p> <p>4.5.1 The country of origin of the food shall be declared if its omission would mislead or deceive the consumer.</p>	<b>Canada</b>

**a. Noting the content of Section 4.5 on Country of origin in the *General standard for the labelling of pre-packaged foods* (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.**

REPLIES	MEMBER/ OBSERVER
<p>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.</p> <p>As specified above, for the purposes of food labelling, the country of origin would change if processing changes the nature of the food.</p> <p>In general, a food is considered to change nature, or to have undergone substantial transformation, when it becomes a new and different food, typically one with a new common name. For Codex Committee on Spices and Culinary Herbs standards, these often include multiple styles, species and variations, within the same standard and common name. For example:</p> <ul style="list-style-type: none"> <li>• The Standard for Dried Floral Parts – Saffron – includes these styles: filaments, cut filaments, powdered and other styles provided labelled – all under the common name dried saffron</li> <li>• The Draft Standard for Spices derived from Dried or Dehydrated Fruits and Berries – Vanilla – includes these styles: whole beans, splits, cut, vanilla pulp and seeds, ground/powdered – all under the common name vanilla</li> <li>• The Standard for Dried Basil – includes these styles: whole/intact, crushed/rubbed/flaked, ground/powdered, other – all under the common name basil</li> <li>• The Standard for Dried Seeds – Nutmeg – includes these styles: whole inshell, whole shelled, broken seed, ground – all under the common name nutmeg</li> </ul> <p>Regardless of what style these and other spices and culinary herbs take, their common name remains the same. Further, as these styles are within the same standard, they are considered to be the same food. Therefore, a change in style, such as grinding of a spice, cannot be considered to change the nature of the food, and as such, would not change the origin of the food for the purposes of food labelling. What this means in practical terms is that the origin of a spice such as dried saffron does not change if it is harvested in one country and ground in another. The country of origin, for the purpose of labelling, remains the country where the food was harvested, as the grinding step taken does not change the nature of the food. The ground form is, in fact, the same food, as it is within the same standard.</p> <p>It is also important to note that the CCSCH definition of Further Processing found in the CCSCH Glossary of Terms (SCH/7 INF/01) (below) includes additional things that do not change the nature as per the CCFL description of origin (i.e. sorting, grading, packaging etc. do not change the nature of the food).</p> <p>The Glossary of Terms for SCH Standards defines Further Processing as:</p> <p>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.</p> <p>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 saffron or other 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, as per the GSLPF.</p> <p>Examples of processes that would change the nature of spices are those that create a new and different food. For example:</p>	

<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
<ul style="list-style-type: none"> <li>• Vanilla extract – a liquid extract prepared from dried or cured vanilla in an alcohol solution</li> <li>• A spice blend consisting of dried saffron and other spices</li> <li>• A seasoning mix consisting of various spices and salt</li> </ul> <p>In the above examples, the foods are no longer the product covered by a CCSCH standard, and are new foods. For example, in the case of a spice blend consisting of dried saffron and other spices, the blend would not fall under the dried saffron standard and would not be able to be called “dried saffron”. In all of these examples, the foods subject to CCSCH standards are inputs into the final food, and the applicable labelling requirements would be for the resulting food, not the input ingredients.</p> <p>Notably, the scope of CCSCH standards - like the Draft Standard for Dried Saffron - specifically exclude industrial processing. While industrial processing could change the nature of the product, and thus result in a new origin for labelling (as per the GSLPF), it would not affect the origin of the inputs. For example, vanilla extract produced through industrial processing falls outside of the scope of the Draft Standard for Spices derived from Dried or Dehydrated Fruits and Berries – Vanilla; until this change of nature as a result of industrial processing occurs, the country of origin of the vanilla (input into the extract) remains where it was harvested.</p> <p>The Glossary of Terms for SCH Standards (SCH/7 INF/01) defines Industrial Processing as:</p> <p>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.</p> <p>As industrial processing is excluded from CCSCH standards, discussions about origin labelling provisions for foods subject to these standards are limited to types of processing that are within the scope of the standard, and whether those types of processing change the nature of the food or not.</p>	
<p>Noting the content of Section 4.5 on Country of origin in the General standard for the labelling of pre-packaged foods (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</p> <p>In Chile, generally speaking, culinary herbs and spices, including saffron and vanilla, do not undergo changes in their nature under normal packaging conditions. The bulk import of these products, followed by common operations in the national territory such as cleaning to remove impurities (unwanted plant fragments, inorganic material, etc.), selection to standardise quality, chopping or cutting to facilitate use, grinding to obtain powdered presentations, and finally packaging for sale to the end consumer, are considered to be transformations of an eminently physical nature. They do not alter the intrinsic properties and nature of the product, and the organoleptic characteristics of its composition or nutritional value are maintained.</p> <p>Therefore, from the perspective of labelling of prepackaged foods in Chile, these operations in themselves do not justify a change in the ‘country of origin’ declaration. The designation of the primary origin would remain unchanged, reflecting the place where the spice was originally grown or harvested.</p> <p>In the hypothetical case of ingredients significantly modifying the composition or intrinsic characteristics of the imported spice being added, it could be argued, from Chile's perspective, that the resulting product has acquired a new identity, which could</p>	Chile

<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
<p>require reconsideration of the ‘country of origin’ for labelling purposes, capturing the place where this substantial transformation was carried out. (GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS CXS 1-1985 and its general principles 4.5.1 and 4.5.2.</p> <p>We are of the opinion that this standard should clarify what point 4.5.2 implies, with respect to ‘when a food product undergoes processing in a second country, which changes its nature, the country where the processing takes place should be considered the country of origin for labelling purposes’. As the definition of ‘change in the nature of the food product’ is not included in the standard, the interpretation of this point is left open to interpretation. If this term were clearly defined, it would not be necessary to differentiate between the country of harvest and the country of origin for dried or desiccated culinary herbs and spices.</p>	
Question a: No comments	<b>Colombia</b>
<p>Under Section 4.5 of the Standard CXS 1-1985, the country of origin declared on the label must correspond to the place where the last substantial transformation that modified the nature of the product took place. This means that when these ingredients are subjected, in a second country, to processes that alter their form, composition or essential characteristics, that country must be declared as the new origin.</p> <p>In the case of spices such as saffron and vanilla, there are situations in which processing could modify their nature. For example, if saffron threads are ground into powder in a country other than the one where they are cultivated, or if vanilla pods are processed to obtain extract or essences, these changes constitute substantial transformations. The same applies when spices are mixed with other ingredients in proportions that alter their original identity or when they undergo chemical or thermal processes that affect their fundamental properties.</p> <p>In Costa Rica, activities and processes that do not change the nature and, therefore, do not change the country of origin of the food product include: packing, packaging or repackaging, freezing or refrigeration, selection, classification, division of bulk shipments, grouping into packages, fixing of labels, peeling and cutting.</p>	<b>Costa Rica</b>
<p>Spices and herbs are among the most traditional products, most focused and subjected to crushing, grinding, and blending by suppliers without considering any other measures. This inherently alters the product's properties and nature, and consequently, its country of origin. This leads to confusion and a lack of distinction between different products and quality standards. This has led traders to hesitate in production processes for fear of quality, food safety, and fraud.</p>	<b>Egypt</b>
<p>Spices are processed products derived from plants. Post-harvest processes such as removal of dust, sorting, classifying, matching, cutting up, storage, transport and packaging do not change the nature of the spices.</p> <p>In the case of saffron, being a perishable commodity, drying must take place immediately after harvest. Thus, the country of origin and country of harvest is the same. It is also our view that, in the case of saffron, grinding does not change the nature of the product and as a consequence does not have an impact on the country of origin, in other words that the country of origin remains the country of harvest.</p> <p>Vanilla, on the other hand, normally undergoes processes, such as fermentation and grinding that may or may not happen at the place of harvest. Therefore, the country of origin is susceptible of not being the same as that of harvest.</p>	<b>European Union</b>

<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
A typical example of a product for which processing results in changes in this respect is Spanish paprika, which is mainly grown, harvested and dried in China.	FoodDrinkEurope
Honduras acknowledges that certain processes such as drying, grinding or mixing may modify the country of origin declared in accordance with the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985). However, we consider that this standard already provides an adequate framework to ensure proper declaration of the country of origin, without the need to mandatorily include the country of harvest.	Honduras
This is particularly relevant in the case of value-added spice products such as saffron powder or vanilla essence/syrup. For example, when raw saffron threads are processed into saffron powder in a different country, the nature of the product changes. As a result, the country where this processing occurs is often designated as the new “country of origin” for labeling purposes as per section 4.5. Similarly, for vanilla, when raw vanilla beans are processed into derivatives such as vanilla extract, essence, or syrup in another country, the labeling may reflect the processing country as the origin, even though the raw material was harvested elsewhere.	India
Following harvest, many spices are exported to a different country to be cleaned, processed, ground, and/or blended with other ingredients, which may result in changes to the “country of origin” listed on the label of the finished product. This is true for all spices, including saffron and vanilla.	IOSTA
<p>• In the CXS-1-1985 (General Standard for the Labelling of Pre-packaged Foods), the country of harvest is not explicitly addressed. This omission raises concerns regarding transparency, particularly for unprocessed agricultural products that are either repackaged or re-exported from a secondary country, potentially undermining the principles of fair trade. It is important to differentiate between the terms "country of harvest" and "country of origin." The term "Country of Harvest" refers to the specific nation where an agricultural product, such as crops or raw materials, is cultivated and harvested, thereby indicating the geographical location of the farming activities. Conversely, "Country of Origin" pertains to the nation where a product is manufactured, processed, or produced, which may encompass the final assembly or significant transformation of the product within that country [1]. For instance, in the labelling of spices such as saffron and vanilla, it is feasible to specify that the product was cultivated and harvested in its country of origin, while the final processing, including grinding and packaging, occurred in a different country. This practice enhances consumer transparency regarding the product's nature and origin, thereby mitigating the risk of confusion or misleading information. Furthermore, it facilitates a clear distinction between the "country of harvest" and the "country of processing," thereby promoting a more accurate and informative labelling system within the spice supply chain.</p> <p>In addition, agricultural products, such as saffron and vanilla, are categorized as “wholly obtained products” and do not undergo processing. These products are intended for direct consumption by consumers. In this context, it is important to recognize that the county of origin corresponds to the country where saffron is harvested.</p>	Iran
<p>Noting the content of Section 4.5 on Country of origin in the General standard for the labelling of pre-packaged foods (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</p> <p>Vanilla is a unique agricultural product whose value is closely linked to its geographical origin. Indeed, post-harvest processing differs from one country to another, resulting in very different qualities. In Madagascar, this processing—blanching, fermentation,</p>	Madagascar



<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
<p>drying, refining—is carried out entirely by hand, using ancestral methods that preserve the agricultural identity of the pod. The key fermentation and drying process generally takes place in the country of harvest. Even though this step alters the pod, changing its color and developing its aroma, it does not fundamentally change its nature as a vanilla pod.</p> <p>In many cases, vanilla pods are sent abroad for simple packaging or wrapping, which does not change the nature of the product, but according to the rules of origin, they may end up being considered as “originating” in that country, and the label should indicate the country of harvest. This is also the case for major processing such as aroma extraction or powder production, which alters the original nature of the product and could justify an extra mention of the country of processing in addition to the country of harvest (e.g., “Vanilla grown and harvested in Madagascar, processed into extract in France”). The country of harvest remains the main reference for the labeling of dried pods. It is therefore essential that the country of harvest be recognized and declared as the primary reference of origin.</p>	
<p>Noting the content of Section 4.5 on Country of origin in the General standard for the labelling of pre-packaged foods (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</p> <p>In some instances, the processing of spices, such as drying, grinding, roasting, fermenting, and extraction, may significantly alter their nature, potentially affecting the determination of country of origin for labelling purposes. For example, saffron, when simply dried and packaged, may continue to reflect its original country of origin. However, once it undergoes further processing it may be considered a fundamentally different product. Similarly, vanilla beans may retain their original origin when cured and dried, but processing them into vanilla extract or concentrate could shift the origin designation to the country where such transformation takes place. These considerations raise the need for clear and harmonized guidance on how different levels and types of processing affect the assignment of country of origin. Saudi Arabia highlights the importance of addressing this issue under the Codex framework to ensure consistent and transparent labelling practices, particularly for high-value spices like saffron and vanilla.</p>	<b>Saudi Arabia</b>
<p>Noting the content of Section 4.5 on Country of origin in the General standard for the labelling of pre-packaged foods (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling."</p> <p>A typical example of a product for which processing results in changes in this respect is Spanish paprika, which is mainly grown, harvested and dried in China.</p>	<b>Tea &amp; Herbal Infusions Europe THIE</b>
<p>Processing methods that result in a change in the physical and chemical characteristics of the product, thus qualified as “changes the nature” according to Clause 4.5 of CXS 1-1985, may include drying and dehydrating, cutting, grinding or milling, mixing, and extracting.</p>	<b>Thailand</b>
<p>Noting the content of Section 4.5 on Country of origin in the General standard for the labelling of pre-packaged foods (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</p> <p>Uganda position: Spices undergo a number of processes that might change their nature. These include, but not limited to, drying, grinding, extracting and formulations.</p>	<b>Uganda</b>



<p><b>a. Noting the content of Section 4.5 on Country of origin in the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985), provide information on situations where processing of spices might change the nature of spices, including saffron and vanilla which might require changes to the “country of origin” for the purposes of labelling.</b></p>	
REPLIES	MEMBER/ OBSERVER
<p>Consider a case where cinnamon sticks are harvested and dried in Country A and then exported to Country B, where they are processed into cinnamon powder.</p> <p>This grinding process transforms the cinnamon from a whole spice into a fine powder that is more suitable for culinary or industrial use. The change in physical form, along with the resulting differences in aroma intensity and application, can be considered a significant change in the nature of the product.</p> <p>As a result, under the provisions of CXS 1-1985, Country B, where the cinnamon sticks were ground into powder, is the country of origin, rather than Country A where the actual cinnamon was grown and harvested.</p>	
<ul style="list-style-type: none"> <li>• Spices such as saffron and vanilla typically undergo several stages (drying, grinding, extraction, and packaging) which often occur in countries other than where the raw material was originally harvested. As a result, the declared “Country of Origin” on the final product label may need to reflect the country where substantial transformation takes place, thus requiring a clear differentiation between “Country of Harvest” and “Country of Origin.” For Examples:</li> </ul> <ul style="list-style-type: none"> <li>- Vanilla beans harvested in Country A that are cured or extracted in Country B.</li> <li>- Saffron threads harvested in Country A and subsequently dried, processed, or packaged in another country.</li> </ul>	<p><b>United Arab Emirates</b></p>
<p>The United States is not aware of any situations where processing and preparation of spices would change the nature of spices, including saffron and vanilla. In all cases relevant to the standards in question, the United States is of the view that the “country of harvest” and the “country of origin” would be the same.</p> <p>In the U.S. view, the vanilla and saffron that are subject to the draft standard for spices derived from dried fruits and berries – vanilla and the standard for dried floral parts – saffron, respectively, do not undergo processing that would result in a change in the nature of the spice.</p> <p>In the case of spice-related commodities which are not subject to the standards (i.e. extracts), the processing and preparation result in a change of identity of the product and the only appropriate declaration of origin is the “country of origin”. Applying “country of harvest” declaration that differs from the country of origin in the case of any substantial transformation of the spice resulting in a different product would be considered inappropriate, misleading labelling, and create unfair conditions for trade.</p> <p>The United States maintains that “country of origin” is the only appropriate declaration to be applied to foods, noting that country of origin accounts for changes in nature of the food in order to ensure that misleading claims about the food’s origin are not made.</p>	<p><b>USA</b></p>
<p>Uzbekistan recognizes the importance of accurate and transparent labelling in the international trade of spices. However, introducing a mandatory “Country of Harvest” (COH) labelling requirement raises several challenges that need careful consideration.</p> <p>There have been cases where spices are repackaged and mislabelled to indicate a more commercially attractive country of origin rather than the actual source. Ensuring compliance with COH labelling may require enhanced traceability systems, which could increase costs for producers and regulatory authorities.</p> <p>COH labelling may offer additional transparency, its mandatory implementation requires careful consideration to avoid unintended trade barriers and regulatory challenges. We recommend further discussions and impact assessments before introducing such a requirement.</p>	<p><b>Uzbekistan</b></p>

<b>b. Experiences and examples related to inaccurate or misleading origin labelling of spices.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
Australia is aware of the high value of these products, and associated problems with fraudulent origin claims and adulteration of the products.	<b>Australia</b>
<p>Misleading origin labelling of spices often happens when there are different interpretations of what really changes a product's country of origin. For example, in CCSCH discussions, it was mentioned that some businesses think mixing saffron from different countries allows them to change the origin on the label. However, this kind of treatment does not change the nature of the product.</p> <p>This example shows that the main problem is how rules on origin are applied and understood. Simply requiring the declaration of the country of harvest on the label will not solve these misunderstandings, especially if the label still gives a false impression about where the product truly comes from.</p> <p>For blended spices that come from more than one country, the label should clearly indicate, for example, "blend of spices from Country A and Country B", to ensure the information is accurate and not misleading.</p> <p>More guidance is needed to help countries and businesses apply origin rules for spices in a clear and consistent way, in line with Codex principles.</p>	<b>Brazil</b>
<p>Canada understands that inaccurate or misleading origin labelling of spices occurs in cases when the label does not reflect the country where the product originated. For example, if a product that was harvested and cleaned in one country was shipped to another country where it was simply packaged into smaller packages, it would be inaccurate to declare the country of packaging as the country of origin. This is because the product did not change nature in the second country. Similarly, if a spice is harvested in one country and then cleaned, ground and packaged in a second country, it would be misleading to declare the second country as the origin because cleaning, grinding and packaging did not change the nature/substantially transform the food.</p> <p>While practices such as these are misleading, Canada understands that they may be occurring in international trade. These examples relate to how labelling requirements for country of origin are implemented by food business operators, as well as to enforcement of these by competent authorities, as opposed to a gap in the requirements themselves.</p>	<b>Canada</b>
<p>Chile has no specific experiences or examples of inaccurate or misleading labelling of spices with respect to their origin. Existing literature and current records do not document any cases that would allow us to examine this problem in the Chilean context. However, this in no way diminishes the importance of the debate and the global relevance of ensuring transparency and accuracy in the information on the origin of the product.</p> <p>We understand that, at the international level, labelling of origin can be a controversial matter, especially when there are mixing, processing or repackaging processes involved in a country other than the country of original harvest. Below are some cases of experiences and examples of fraud in the labelling of spices at the international level.</p> <ul style="list-style-type: none"> <li>- Study: "Saffron authentication based on liquid chromatography high resolution tandem mass spectrometry and multivariate data analysis". This study revealed that more than 50% of the samples analysed of saffron labelled as 'Spanish' were not of Spanish origin, but came from countries such as Iran, Morocco or India</li> <li>- In May 2021, Spain's Civil Guard disbanded a criminal organisation that was selling Iranian saffron as Spanish saffron, specifically with the Protected Designation of Origin (PDO) 'Azafrán de La Mancha'. Seventeen people were arrested and another 13 were investigated for crimes such as fraud, forgery and crimes against public health. Source: <a href="https://www.interior.gob.es/opencms/es/detalle/articulo/Desarticulada-una-organizacion-criminal-dedicada-a-la-venta-fraudulenta-de-azafran-en-Castilla-la-Mancha/">https://www.interior.gob.es/opencms/es/detalle/articulo/Desarticulada-una-organizacion-criminal-dedicada-a-la-venta-fraudulenta-de-azafran-en-Castilla-la-Mancha/</a></li> <li>- This article highlights that the lower-priced Iranian saffron is being marketed in India as Kashmiri saffron, which has almost brought local farmers to ruin. Source: <a href="https://www.newsweek.com/kashmirs-saffron-farmers-face-ruin-iran-rules-expensive-spice-trade-1556795">https://www.newsweek.com/kashmirs-saffron-farmers-face-ruin-iran-rules-expensive-spice-trade-1556795</a></li> </ul>	<b>Chile</b>

<b>b. Experiences and examples related to inaccurate or misleading origin labelling of spices.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
No comments	<b>Colombia</b>
<p>Sometimes food business operators mix spices harvested in different countries and do not have clarity on how to declare the origin in these cases (whether only one country is to be labelled as country of harvest or whether both countries should be indicated).</p> <p>For example, cinnamon harvested in Vietnam and Indonesia may be labelled mentioning only one of these countries, leading to variation in practices and possible inconsistencies in the information provided to consumers.</p>	<b>Costa Rica</b>
<p>The commodity's origin refers to the nationality of the commodity, i.e. the country in which the commodity was produced. When determining the origin of any commodity, this is done based on a set of rules and foundations that are commonly called in the field of international trade and customs business circles the rules of origin. These rules are determined by national legislation and international trade agreements.</p> <p>Within the framework of rules of origin, the so-called origin-determination criteria gain special importance. Origin criteria refer to the criteria that can be used to define and identify a product. Determining the nationality of each commodity exchanged between countries serves several important purposes, including:</p> <ul style="list-style-type: none"> <li>• Establishing trade policies, including anti-dumping, subsidy, and safeguard policies.</li> <li>• Determining customs treatment and granting customs exemptions, particularly within the framework of free trade agreements.</li> <li>• Statistical purposes and database development.</li> <li>• Government procurement.</li> <li>• Procedures for protecting human, plant, and animal health.</li> </ul>	<b>Egypt</b>
<p>A concern raised by the spice and seasoning sector is the inconsistency among authorities regarding what qualifies a "processed product" and its link to the origin of product. Examples of origin-related deception include mismatches between the declared country of origin and the actual source of the spice.</p> <p>A concrete case might be that of black pepper that stems from technical inconsistencies in the application of the rules of the Customs Codes on the one hand and the Food Hygiene Regulations on the other. Companies in country A import whole peppercorns from country B and grind them locally, having one customs code for whole peppers and a different one for ground pepper. There are different practices regarding declaration of the country of origin (i.e. some countries consider that the country of origin is country A whereas others consider that it is country B). It may be argued that it is in the interest of the consumer to be informed on the country of harvest.</p> <p>Other reported examples of labelling practices of saffron products which add to the confusion include: "packed in country X"; "packed in country X for a company in country Y"; "grown in country X"; Selected &amp; Packed in country X"; "Imported by a company in country X, packed in a country Y"; "American Saffron (Carthamus tinctorius)".</p>	<b>European Union</b>
There have been isolated cases in the international market involving the adulteration of spices such as saffron; however, we do not believe that declaring the country of harvest prevents such cases in an effective manner, as the fraud can be committed by mixing after the point of harvest, even if the country of harvest is correctly declared.	<b>Honduras</b>
<p>In addition to our response to question (a), we would like to highlight a concerning and prevalent practice that contributes to inaccurate or misleading origin labelling of spices. This often stems from trade practices aimed at exploiting differential customs duties between countries.</p> <p>For instance, a spice may be originally cultivated and harvested in Country A, but instead of being directly exported, it is first shipped to Country B. In Country B, the product may undergo minimal processing or simply be repackaged, after which it is exported to Country</p>	<b>India</b>

<b>b. Experiences and examples related to inaccurate or misleading origin labelling of spices.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>C. This practice is particularly motivated by the fact that Country C imposes a lower customs duty on imports originating from Country B compared to Country A.</p> <p>As a result, the declared country of origin on the product is changed to Country B, despite the primary ingredient being sourced from Country A. Such re-routing and re-labelling not only mislead consumers and importing authorities but also severely compromise the traceability and transparency of the supply chain. The true origin of the spice becomes obscured, making it difficult for competent authorities to monitor the authenticity, quality, and safety of the product.</p> <p>Moreover, this type of practice undermines consumer trust and hinders regulatory oversight. It presents a significant challenge in the context of food fraud, as the origin label plays a crucial role in verifying the credibility of the product, ensuring compliance with food safety standards, and facilitating recalls when required.</p>	
<p>One of the major challenges in the saffron and spice industries is fraud and the misrepresentation of the country of origin. For instance, there have been cases where saffron is illegally diverted to second countries and sold under those countries' names in global markets. This type of fraud not only misleads consumers but also harms the interests of the original producers. Moreover, such practices create unfair competition by introducing products at lower prices that do not meet the standards of the country of origin, potentially damaging the quality and reputation of trusted brands.</p>	<b>Iran</b>
<p>Inaccurate or misleading labeling is a major problem for vanilla, particularly for vanilla from Madagascar. Vanilla grown and processed manually in Madagascar is often exported, then repackaged or blended in third countries with cheaper, lower-quality pods and mislabeled as "Madagascar vanilla" to leverage its reputation and higher price.</p> <p>There are cases where blends of vanilla from different origins (Madagascar, Comoros, Indonesia, PNG) have been sold under a single origin (often "Bourbon") without specifying all origins, thus making traceability impossible. These frauds damage the reputation of authentic producers in Madagascar, create unfair competition, mislead consumers, and undermine confidence in supply chains.</p> <p>There have also been cases where artificial or synthetic vanilla has been labeled as "natural Madagascar vanilla" or "Bourbon vanilla." Vague labels such as "Exotic vanilla" or "Indian Ocean vanilla" are used to hide the exact origin.</p> <p>In addition, vanilla pods from Madagascar are exported by third countries, packaged and wrapped in the importing country, and then labeled as originating in the importing country.</p> <p>This creates confusion in the market and unfairly obliterates the work of rural communities that carry out the entire production process by hand, under demanding conditions.</p>	<b>Madagascar</b>
<p>Inaccurate or misleading origin labelling is a recurring concern in the spice industry, especially for high-value products such as saffron and vanilla. In some instances, products may be labelled as originating from a particular country to benefit from its reputation, even though the raw materials are sourced from elsewhere. Examples include saffron that is blended from different countries and marketed as a single-origin product. Another example involves products originating from a country under trade restrictions being exported through a third country where only limited processes, such as repackaging, take place. Despite the absence of substantial transformation, the third country may be incorrectly declared as the country of origin.</p> <p>These practices raise concerns regarding transparency, fair competition, and consumer trust. Saudi Arabia stresses the importance of establishing clear and harmonized international guidelines to ensure accurate and verifiable origin labelling in the global spice trade.</p>	<b>Saudi Arabia</b>
<p>We have no experience or examples in this case.</p>	<b>Thailand</b>

<b>b. Experiences and examples related to inaccurate or misleading origin labelling of spices.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>Uganda position: Cloves are a well-known spice traditionally grown in Zanzibar, Tanzania, which is globally recognized for producing high quality cloves due to its unique climate and soil.</p> <p>Uganda, which does not produce cloves at scale, imports whole cloves from Zanzibar. These cloves are then processed in Uganda, cleaned, ground into clove powder, and packaged for local retail and export.</p> <p>If the final product label states “Product of Uganda” without necessary indicating the origin of the raw cloves Zanzibar, this could mislead consumers. Many buyers associate cloves with Zanzibar’s premium quality and heritage.</p>	<b>Uganda</b>
<p>There have been observed instances where saffron is imported from a particular country, repackaged domestically or in another country, and then re-labelled with a different country as the declared country of origin. Such practices raise concerns about accuracy and can mislead consumers regarding the true origin of the product.</p>	<b>United Arab Emirates</b>
<p>The United States is not aware of any inaccurate or misleading origin labelling of spices. With regard to vanilla and saffron specifically, the United States has not experienced enforcement issues with inaccurate or misleading “country of origin” labelling for spices, nor any pattern of non-compliance with “country of origin” labelling for these commodities. In addition, the United States has not fielded questions regarding the distinction between “country of harvest” or “country of origin” for these commodities.</p> <p>The United States further notes that no specific trade concerns have been raised in the WTO TBT Committee with respect to origin declarations for dried saffron or other spices, specifically, and as such, it would appear that the existing “country of origin” labelling of spices is adequate in international trade.</p>	<b>USA</b>

<b>c. Challenges related to fraudulent or false origin declarations on dried saffron or other spices.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER /</b>
<p>Challenges related to fraudulent or false origin declarations on dried saffron or other spices</p> <p>Misrepresentation of the geographic origin of saffron is a well-known issue in trade, which is not easily detected through product testing.</p>	<b>Australia</b>
<p>Fraudulent or misleading origin declarations for spices such as saffron are often driven by the high commercial value associated with specific regions of production. In many cases, the declaration of the country of harvest is used to convey certain quality characteristics linked to geographical origin, an approach more closely related to the concept of geographical indications (GIs), which are a form of intellectual property.</p> <p>However, it is important to note that the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) is currently developing the Guidelines on the Prevention and Control of Food Fraud, and CCFICS27 has agreed to exclude intellectual property, including GIs, from the scope of this work. This highlights a key limitation: origin fraud connected to the misuse of reputation of specific producing countries cannot be fully addressed through general food labelling rules or by simply requiring the country of harvest on the label.</p> <p>Therefore, requiring the declaration of the country of harvest alone will not resolve the broader challenges related to fraudulent origin claims. Addressing such issues requires a broader approach, including traceability systems and enforcement mechanisms, in addition to clear and harmonized guidance on origin labelling for spices under Codex standards.</p>	<b>Brazil</b>
<p>When the origin of dried saffron or other spices is mis-declared, consumers who may be seeking products from a specific source are not able to make these purchasing decisions. It is important to note, however, that such issues will not be corrected by putting in place additional labelling requirements, as these may be equally prone to false or fraudulent declarations. To address challenges related to this type of deceptive practice, as well as to address food hazards, the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) is currently undertaking work to update The Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CAC/GL 60-2006). This initiative includes more emphasis on traceability as a tool in fraud prevention.</p>	<b>Canada</b>
<p>Although no specific cases of fraudulent or false declarations of origin in the labelling of spices have been documented in Chile, there are concerns expressed at the international level that highlight significant challenges. Economic fraud and unfair competition are evident when cheap spices, such as Iranian or Afghan saffron, are resold as saffron from regions of high value (such as La Mancha in Spain or Kashmir in India). This practice not only affects local producers who comply with quality and traceability standards, but also leads to a loss in consumer confidence, damaging the credibility of brands and the authenticity of products. The difficulty in tracking the international trade of spices, given the multiplicity of intermediaries, exacerbates this situation, as tracking the true origin of the product becomes a complex task. Furthermore, identifying fraud in spices such as saffron requires costly and complex chemical or genetic analysis, which has an economic impact on the regions protected by designations of origin. Going beyond the economic aspect, there is also a risk to consumer health, as cases of fraud in declaration of origin are often accompanied by adulteration.</p>	<b>Chile</b>
No comments	<b>Colombia</b>
There is no information available on challenges concerning fraudulent or false declarations of origin in the case of dried saffron or other spices.	<b>Costa Rica</b>
In Egypt, the Executive Regulations of the Import and Export Law shall be adhered to regarding certificates of origin or other documents proving origin and accompanying documents." A document proving origin consider as very important document in the event of a request to apply a customs exemption or preference or/and any other cases in accordance with the regulations implementing the import and export law."	<b>Egypt</b>



<b>c. Challenges related to fraudulent or false origin declarations on dried saffron or other spices.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>Therefore, it can be said that there are certain types of violations regarding the requirements for proof of origin, including:</p> <p>Incomplete information, Inconsistencies with Commercial Documents, Incorrect information and Non-Compliance.</p>	
<p>There are several significant challenges faced by regulatory authorities in detecting fraudulent or false origin declarations on dried saffron and other spices that arise particularly from the global nature of the spice trade. Key challenges include:</p> <ul style="list-style-type: none"> <li>• Complex and Fragmented supply chains: Spices will often pass through multiple stages of processing, packaging, and transportation in several countries before they reach their final market. Each intermediary in the supply chain may handle, repack, or re-label the product, making it difficult to verify the true country where the raw material originated.</li> <li>• Variability in spice composition/chemical similarities: Even within a single region, saffron and other spices may exhibit variability in their chemical composition due to factors like climate, soil conditions, and harvesting methods. This makes it challenging to create a reliable, universally applicable reference standard to authenticate the origin of spices.</li> <li>• Cost: Sample size needed for testing can be significant and acquiring a batch for testing of an expensive spice such as saffron can be prohibitively expensive.</li> <li>• Difficulty in verifying the origin. Once saffron is dried and processed, it is complex to determine the geographic origin by analytical methods.</li> <li>• Lack of oversight on online markets: Some online platforms have no control on spices sold through third-party vendors. Sellers mislead consumers by making false claims, given that they do not need to provide any evidence about the origin of the product they are selling.</li> <li>• Safety concerns: Adulteration is a common practice used to disguise low-quality saffron. Substances like artificial colorants, lead, or other harmful substances may be added to enhance the appearance of the product. These additives can be toxic and therefore pose a significant health risks to consumers. The economic incentives for mislabelling coupled with weak traceability create opportunities for widespread fraud.</li> </ul>	<b>European Union</b>
<p>The analytical methods for identifying such fraudulent practices are complex and also costly.</p>	<b>FoodDrinkEurope</b>
<p>We acknowledge that there are risks of fraud being committed in the case of high-value products such as saffron and vanilla. However, we reiterate that the declaration of the country of harvest alone is not an effective tool against this type of fraud. Control should focus on traceability mechanisms, more rigorous technical controls and trade surveillance, beyond just labelling requirements.</p>	<b>Honduras</b>
<p>A significant challenge in ensuring authenticity in the spice trade, particularly for high-value products like dried saffron, is the practice of misrepresenting the true origin of the product. A common issue involves blending or mixing high-grade or premium spice material sourced from one country (Country A) with lower-grade material from another country (Country B), followed by packing or repacking the final product in a third country (Country C). This can result in a false or misleading declaration of origin.</p> <p>Such deceptive practices undermine the credibility of global spice trade, lead to economic losses for producers of high-grade spices, and deny them rightful market recognition. They also compromise product quality and mislead consumers who are often willing to pay a premium for authentic, traceable, and high-quality products (example extra class/grade spice product).</p> <p>Mandating the declaration of the “country of harvest” can serve as a powerful tool to address this issue. By requiring that the exact country where the spice was originally harvested be clearly stated on the label, this measure introduces greater transparency and traceability in the supply chain. It becomes significantly more difficult to disguise</p>	<b>India</b>

<b>c. Challenges related to fraudulent or false origin declarations on dried saffron or other spices.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
or misrepresent the true origin of the product, thereby discouraging fraudulent practices such as mixing and relabeling.	
There are limited analytical methods available to identify geographical origin, and methods that are available are complex and often costly.	<b>IOSTA</b>
<ul style="list-style-type: none"> <li>One of the major challenges in the saffron and spice industries is fraud and the misrepresentation of the country of origin. For instance, there have been cases where saffron is illegally diverted to second countries and sold under those countries' names in global markets. This type of fraud not only misleads consumers but also harms the interests of the original producers. Moreover, such practices create unfair competition by introducing products at lower prices that do not meet the standards of the country of origin, potentially damaging the quality and reputation of trusted brands.</li> </ul>	<b>Iran</b>
<p>Fraudulent declarations of origin are a crucial challenge for the high-value spice market. One major problem is the blending of vanilla from different countries of harvest, but labeling it with a single designation of origin, thus distorting traceability and disadvantaging producers in a specific region.</p> <p>Misrepresentation of origin by companies that buy cheaper vanilla from other countries to resell it at a higher price under this label is particularly widespread and damaging.</p> <p>The complexity of the supply chain, in which vanilla is processed in different countries, facilitates document forgery and bypassing of requirements. Quality fraud, including the blending of high-quality vanilla with lower-quality vanilla, destabilizes the market and misleads consumers who pay a premium for the real thing.</p> <p>These fraudulent practices deprive genuine producers of their income and damage the reputation of products that meet rigorous artisanal standards passed down from generation to generation to produce high-quality products.</p> <p>The lack of clear regulatory requirements regarding the indication of the country of harvest encourages the emergence of lower-quality products that are mislabeled.</p> <p>Finally, it helps to strengthen control systems (inspections, SSA audits) and combat theft and illegal blending in vanilla producing countries such as Madagascar.</p> <p>Madagascan vanilla is cultivated, selected, processed, and refined entirely by hand by thousands of rural families. This manual expertise, combined with a unique ecosystem, makes our vanilla an exceptional product. Not declaring the country of harvest not only hides the identity of the product, but also erases its cultural and human heritage.</p>	<b>Madagascar</b>
One of the key challenges related to fraudulent or false origin declarations in dried saffron and other spices is their high vulnerability to food fraud. Another significant challenge arises when food products, including saffron and other spices, are exported through a third country. In such cases, determining the original country of the product becomes difficult, as the process depends heavily on the documentation provided by the importer. This creates vulnerabilities in the verification system and highlights the need for stronger traceability measures and international cooperation to ensure the integrity of origin declarations.	<b>Saudi Arabia</b>
The analytical methods for identifying such fraudulent practices are complex and also costly.	<b>Tea &amp; Herbal Infusions Europe THIE</b>
False origin declaration is a challenge related to misrepresenting the origin of spices. This happens when manufacturers bring raw materials from other countries to produce goods in a country considered a credible origin, aiming to increase the product's value. Consequently, consumers receive inaccurate information about the raw material's true source.	<b>Thailand</b>

<b>c. Challenges related to fraudulent or false origin declarations on dried saffron or other spices.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
Uganda position: Certain spices including dried saffron from particular regions and countries command high market prices due to their distinct quality, aroma, and color. To fetch higher prices, some traders falsely label spices of lower quality as being from premium producing regions.	<b>Uganda</b>
<p>The United States has not observed a pattern of fraudulent or false origin declarations on dried saffron and other spices. In fact, due to the nature of dried saffron and other spices' production, processing, certification, and trade, the United States believes that attempting to make a mandatory distinction between "country of origin" and "country of harvest" would introduce several significant challenges to ensuring the truthfulness of the harvest country listed on a product's labeling and certification. Such an artificial distinction would place supply chain participants, inspectors, and certifiers in the impossible situation of verifying claims related to the "country of harvest" for which there are no validated methods available, and the United States is concerned that this would in fact encourage fraudulent labelling.</p> <p>The United States emphasizes that challenges related to fraudulent labelling, specifically false origin declarations, for spices would not be remedied by establishing an additional "country of harvest" labelling requirement. Fraudulent labelling and false origin declarations are expressly prohibited by Codex labelling standards, and not unique to a specific commodity or category of food. If "country of origin" is being wrongly or mistakenly applied or interpreted, then CCFL should consider whether additional guidance regarding the application of "country of origin" declaration is needed.</p> <p>In cases where there is fraud, including issues such as false origin declaration, the guidance being developed by the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) regarding food fraud should be referred to. Fraudulent labelling cannot be resolved by adding mandatory country of harvest labeling as it is an enforcement issue and, as indicated below, there are no validated or harmonized means for verifying "country of harvest".</p>	<b>USA</b>

<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>Australia routinely tests for compliance with food safety and labelling requirements. Ad hoc surveys for food authenticity are conducted, usually focusing on potential adulteration/substitution. Product testing to verify geographic origin is not a viable option for routine enforcement activities.</p> <p>Australia continues to consider and improve strategies to address food fraud through:</p> <ul style="list-style-type: none"> <li>• Improved testing methods</li> <li>• International cooperation</li> <li>• Facilitating commercial prevention and mitigation strategies</li> <li>• Implementing a national agricultural traceability strategy to uplift food traceability systems across the food and agriculture sector.</li> </ul>	<b>Australia</b>
<p>The concept of the country of harvest is not currently a requirement under international trade standards and is not explicitly defined by international trade organizations. As a result, inspections and enforcement activities are typically based on the documentation provided at the point of entry, such as the Bill of Lading (BL) or AirWay Bill (AWB). These documents generally contain mandatory information about both the country of origin and the country of provenance.</p> <p>For example, in Brazil, the customs regulations under Decree 6.759 (February 5, 2009), Article 557, define the "country of origin" as the location where the goods were produced or where the last substantial transformation took place. In contrast, the "country of provenance" refers to the location where the goods were situated at the time of purchase, which may or may not be the same as the country of origin.</p> <p>Therefore, inspectors verify labelling based on these official documents, ensuring that the information provided aligns with the regulatory definitions. However, it is important to note that the country of harvest, while important for some products, does not currently have a standard definition in international trade and is not universally required or enforced under international law. This could lead to challenges in verifying the country of harvest independently from the country of origin unless clearer guidelines are established.</p>	<b>Brazil</b>
<p>As established in the GSLPF, any information on food labels must be truthful and not misleading, including declarations about origin of foods or ingredients. Inspectors may use various techniques to determine if label information about origin is truthful, including verification of company documentation, invoices, import and traceability records. This can occur at any stage in the production and distribution process, and may occur in the country of production, in the importing country, or as part of foreign verifications and audits. Enforcement activities occur when non-compliances are identified, including when an origin statement is determined to be false or misleading.</p> <p>The Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) has published a number of texts outlining principles and practices related to inspection systems.</p>	<b>Canada</b>
<p>Chile currently has no specific requisites outlined in regulations on food products that makes it mandatory to declare the country of harvest on the labelling of culinary herbs and spices, nor is there a formal definition of this concept. However, in the context of import of food products, the country of origin is to be officially declared, which is then verified by the health authority as part of the established inspection procedures. This control is done through mandatory procedures such as the Customs Destination Certificate (CDA) and the Use and Disposal Certificate (UyD), which ensure that imported products comply with national regulations in effect. As part of this review process, the country of origin must be clearly identified in official documents such as the Health Certificate issued by the competent authority of the exporting country, which must be submitted for each import consignment, have validity, contain all official stamps and signatures, and comply with the established legal requirements. Although this verification process does not involve direct</p>	<b>Chile</b>

<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>auditing of the country of harvest, it does establish documentary traceability, which is key to food safety and transparency in food labelling.</p> <p>Safety Inspections and compliance with regulations in effect on food products:</p> <p>Two fundamental procedures must be complied with in the case of import of food products as mandated by the health authority, the Ministry of Health (MINSAL)</p> <p>1. Customs Destination Certificate (CDA)</p> <p>This procedure involves a review of the documentation to authorise the removal and transportation of products from the customs area to the authorised warehouse where they will be stored. To process this, the importer must indicate:</p> <ul style="list-style-type: none"> <li>• The customs office where the goods will enter the country.</li> <li>• The address of the destination warehouse.</li> <li>• The route and conditions of transport.</li> </ul> <p>In addition to the above, the following documents must be attached:</p> <ul style="list-style-type: none"> <li>• Product invoice.</li> <li>• Copy of the warehouse's health permit.</li> <li>• Airway Bill (air or sea).</li> <li>• Packing list.</li> </ul> <p>2. Certificate of Use and Disposal (UyD)</p> <p>The purpose of this procedure is to verify compliance with national regulations in effect on imported food products. The following documents must be submitted for evaluation:</p> <ul style="list-style-type: none"> <li>• Approved CDA.</li> <li>• Copy of the purchase invoice.</li> <li>• Health certificate issued by the competent authority in the country of origin.</li> <li>• Product data sheet, issued by the manufacturer, written in Spanish.</li> <li>• Product labelling that complies with the requirements of the Food Health Regulations (RSA).</li> </ul> <p>If necessary, the health authority may take food samples to evaluate microbiological and bromatological parameters and other relevant aspects.</p> <p>Additional observations:</p> <p>The health authority is empowered to request additional information or documentation regarding imported products. The health certificate from the country of origin must be submitted for each import consignment and must have validity, contain all official stamps and signatures, and comply with the established legal requirements.</p>	
<p>In Colombia, importers of food products, raw materials or ingredients for food products meant for human consumption must comply with the following:</p> <p>1. They must possess an import permit issued by Invima, in accordance with the provisions in Decrees 4149 of 2004 and 2078 of 2012 or the regulations modifying, adding to or replacing them.</p> <p>2. The food products that are imported should be covered in the registration, permit or health notification issued by Invima.</p>	<b>Colombia</b>

<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>3. Food products exempt from registration, permit or health notification and imported raw materials that are used exclusively by the food industry and the catering sector in the processing and preparation of food must provide information on such use in the format set out by Invima.</p> <p>4. They must submit the Health Certificate from the country of origin. Only a Free Sale Certificate (FSC) from the country of origin can be accepted for products that represent a lesser risk to public health.</p> <p>Invima shall proceed in the following manner to issue the Health Inspection Certificate:</p> <p>1. It shall verify that the Health Certificate from the country of origin contains the information referred to in Article 3 of Decree 539, 2014. Likewise, it shall conduct the aforementioned verification process for the Free Sale Certificates (FSC) issued by the country of origin, which are submitted in compliance with the provisions of paragraph 4, Article 4 of the aforementioned decree.</p> <p>2. It shall conduct a physical inspection of the products, in accordance with the procedures established by Invima, within the framework of the Inspection, Surveillance and Health Control system. The corresponding report shall be prepared based on the inspection activity.</p> <p>3. It shall take samples and carry out laboratory analyses of food or raw materials for food in accordance with the Inspection, Surveillance and Health Control system established by the Ministry of Health and Social Protection.</p> <p>As part of the physical inspection process, the protocol for evaluating the labelling of packaged foods and imported food product raw materials shall also be applied, verifying compliance with the requirements established in Resolution 5109 of 2005 and Resolution 557 of 2022.</p> <p>It must be pointed out that the country of harvest is not taken into consideration as part of the requisites evaluated throughout the process.</p> <p>Below are links to the aforementioned regulations.</p> <p>Decree 4149 of 2004 - which streamlines certain foreign trade procedures and processes, establishes the Single Window for Foreign Trade, and other provisions.  <a href="https://www.mincit.gov.co/getattachment/33a52382-6bea-4fea-bb20-db985fcac34a/Decreto-4149-de-2004-Por-el-cual-se-racionalizan-a.aspx">https://www.mincit.gov.co/getattachment/33a52382-6bea-4fea-bb20-db985fcac34a/Decreto-4149-de-2004-Por-el-cual-se-racionalizan-a.aspx</a></p> <p>Decree 2078 of 2012 – which establishes the structure of the National Institute for Food and Drug Surveillance (Invima) and sets out the functions of its departments.*  <a href="https://www.funcionpublica.gov.co/eva/gestornormativo/norma.php?i=66709">https://www.funcionpublica.gov.co/eva/gestornormativo/norma.php?i=66709</a></p> <p>Decree 539 of 2014 – which sets out the technical regulations with respect to sanitary requisites that importers and exporters of food for human consumption, raw materials and ingredients of food products intended for human consumption must comply with, and establishes the procedure for authorization of food product factories located abroad.  <a href="https://www.minsalud.gov.co/Normatividad_Nuevo/Decreto%200539%20de%202014.pdf">https://www.minsalud.gov.co/Normatividad_Nuevo/Decreto%200539%20de%202014.pdf</a></p> <p>Resolution 5109 of 2005 which sets out the technical regulations on labelling requirements for packaged food products and raw materials for human consumption.  <a href="https://www.minsalud.gov.co/sites/rid/Lists/BibliotecaDigital/RIDE/DE/DIJ/Resolucion%205109%20de%202005.pdf">https://www.minsalud.gov.co/sites/rid/Lists/BibliotecaDigital/RIDE/DE/DIJ/Resolucion%205109%20de%202005.pdf</a></p> <p>Resolution 557 of 2022 – which amends Article 4 of Resolution 5109 of 2005 on labelling of food products.  <a href="https://www.funcionpublica.gov.co/eva/gestornormativo/norma.php?i=185398">https://www.funcionpublica.gov.co/eva/gestornormativo/norma.php?i=185398</a></p>	



<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>In Costa Rica, the national legislation stipulates that the country of origin must be declared as part of mandatory labelling requirements, which means that this information is subject to routine verification. However, there are no specific methodologies or standardised procedures at the national level for verifying this information in the field or through other mechanisms.</p> <p>It is important to note that verification of documentation has its limitations, as it does not always allow us to confirm the declared origin with certainty or to rule out any possible cases of fraud.</p> <p>Furthermore, the indication of the country of harvest is not a mandatory labelling requirement under national regulations and, as a result, is not currently included as part of inspection activities.</p>	<b>Costa Rica</b>
<p>The integrity of the data of certificates of origin can be verified through an electronic database available at the competent regulatory authorities, for example by verifying the following data: (1) the country issuing the certificate; (2) the type of certificate; (3) the printed number; (4) the year of issuance of the certificate.</p>	<b>Egypt</b>
<p>Inspection is carried out based on documentary traceability controls.</p>	<b>European Union</b>
<p>Honduran Health Control and Inspection Authorities apply the national and regional legal framework (including RTCA 67.01.02:2010 on general labelling of prepackaged foods) to verify compliance with labelling requirements, focusing on the country of origin. The inclusion of a new requirement such as the country of harvest is a means for control or prevention of fraud.</p>	<b>Honduras</b>
<p>As per Food Import Regulations in India, declaration of ‘Country of origin’ is a mandatory requirement for imported food products. As part of the Food Import Clearance System of India, inspection officers (AO) conduct document scrutiny to verify details including certificate for “country of origin.” This includes checking the authenticity of the certificate by verifying whether the same has been issued by the Competent Authority of the exporting country. If there is any doubt regarding the authenticity of the certificate, the matter is referred by FSSAI to the concerned Embassy in India for verification to determine whether the certificate is genuine or fraudulent.</p> <p>Internationally also, the basis for verifying the country of origin is scrutiny of documents submitted and the labels as a part regulatory requirement rather than following any scientific basis. Therefore, the same existing mechanism for inspection &amp; enforcement would apply in case of ‘Country of Harvest’ also.</p>	<b>India</b>
<p>To ensure the accuracy of labelling related to both "country of origin" and "country of harvest" for saffron and other spices, thorough inspection and enforcement are necessary. In many countries, inspectors use various methods to verify the information on labels, including tracing product origin documentation, inspecting production and packaging processes, and conducting laboratory tests to confirm authenticity and quality. In Iran, organizations such as the National Standard Organization and the Food and Drug Administration oversee the labelling of export products. Additionally, producers of food and spices are required to have standard licenses and Health Certificate labels issued by the Food and Drug Administration, and they use export registration codes for international trade. These regulatory systems and licenses help prevent fraud and misuse in export processes and ensure that consumers receive accurate and truthful information. There are two government official certificates that is used for import of agricultural products. Phytosanitary certificate that is issued by Ministry of agriculture and could show country of harvest, and Certificate of Origin is issued by Chamber of commerce &amp; Industry that mention the country of origin.</p> <p>This issue may generate unexpected opportunities that, when addressed, have the potential to establish a favorable market characterized by significant added value.</p>	<b>Iran</b>

<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</p> <p>Inspections to verify vanilla labeling are carried out at several stages of the supply chain. In producing countries such as Madagascar, inspectors ensure that pods are correctly labeled by checking commercial documents, phytosanitary certificates, and production records. At export points, customs authorities verify labeling based on export documents. These measures can effectively uphold international labeling rules, provided that the country of harvest is explicitly required by Codex standards.</p> <p>In importing countries (e.g., EU, USA), customs and health agencies examine labels, invoices and certificates of origin. The use of traceability databases such as TRACES in Europe makes it possible to track the origin from the time of harvest. Physical inspections and sampling are carried out in warehouses or sales outlets to confirm the origin and quality. Authorities also verify the validity of product claims (organic, fair trade) through documentation and audits. These controls aim to ensure the accuracy of country of harvest labeling and investigate fraud. Making the “country of harvest” mandatory could simplify enforcement efforts by providing clearer guidelines.</p>	<b>Madagascar</b>
<p>Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</p> <p>Saudi Arabia has clear regulatory requirements in place regarding the declaration of the country of origin on food product labels. These regulations specify that the country where the product was manufactured or produced must be declared. In cases where the food undergoes substantial processing in another country that alters its original nature, the country where this transformation occurred is considered the country of origin for labelling purposes.</p>	<b>Saudi Arabia</b>
Refer to the reply under question f).	<b>Tea &amp; Herbal Infusions Europe THIE</b>
<p>Labelling the country of origin can be verified through several documents such as the accompanying product documents, shipping documents and production facility certificates.</p> <p>However, there are limited analytical methods or scientific proofs to verify that. Therefore, when spices from multiple sources are blended, it would be very difficult to prove the origin labelling, including the country of harvest labelling, since the products have similar physical characteristics.</p>	<b>Thailand</b>
<p>Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</p> <p>Verification of the country of origin is primarily conducted through document review, including certificates of origin, customs documentation, and supplier records. This method is generally effective in regions with bilateral agreements or regional economic blocs, where regulatory authorities have established mutual recognition systems or access to verification platforms.</p> <p>However, in cases where no formal agreements exist between trading countries, verification becomes significantly more challenging. Regulatory authorities may lack access to reliable data or the means to authenticate origin claims, increasing the risk of mislabelling or fraudulent declarations.</p>	<b>Uganda</b>
The United States enforces “country of origin” labelling for certain commodities. The United States defines “country of origin” as: the country of “manufacture, production, or growth” including in a second country if “substantial transformation” occurs involving a different name, character, and use. The United States also recognizes and implements international trade agreements granting legal status to “country of origin” in addition to its provision in CXS 1-1995. To verify “country of origin”, food business operators must maintain, and provide the competent authority access to, documentation sufficient to demonstrate that the	<b>USA</b>

<b>d. Inspection and enforcement activities related to both “country of origin” and “country of harvest” and how inspectors verify labelling.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>product meets the criteria for the claim. However, no criteria exist for “country of harvest”, making compliance and verification impossible.</p> <p>The United States strongly cautions that there are no validated methods for verifying the “country of harvest”. Isotopic ratios vary significantly based on seasonal and other factors, and available methods are not able to distinguish reliably between the location where a seed originated versus where it was planted, grown, and harvested. The lack of reliable and validated methods means that harmonized substantiation for mandatory “country of harvest” declaration would be impossible, including certification of the product and its associated labelling. If “country of harvest” labelling were required, food business operators would have to provide written descriptions of the controls used in harvesting and all stages of processing, as well to trace and, as necessary, segregate products of differing “country of harvest”. Reliable, validated analytical methods supporting such controls, traceability, and segregation of dried saffron and other spices do not exist, which would make mandatory “country of harvest” labelling impossible to comply with in a fair manner across food business operators and countries.</p> <p>In addition, no risk to consumers has been demonstrated that would necessitate this distinction or the additional resources competent authorities would need to allocate toward verifying and enforcing mandatory country of harvest. This is an especially problematic prospect considering that country of origin and country of harvest do not differ for these commodities.</p> <p>The United States does not have domestic regulations for “country of harvest” labelling as the existing “country of origin” system is robust, thorough, and facilitates fair practices in the food trade. Some national inspection agencies, including that of the United States, are legally barred from confirming or attesting to “country of harvest” labelling provisions. Inspection agencies operate within their national legal framework and in compliance with their bilateral or multilateral agreements on labeling.</p> <p>Given this inspection and enforcement reality, mandatory labelling of “country of harvest” is not only not amenable to standardization, it would also not be able to be implemented globally and could lead to duplication or inefficient use of national resources for inspection and enforcement activities related to “country of harvest” with no benefit to public health or increase in consumer understanding of the product.</p>	

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER /</b>
<p>Australia’s position is that requiring an additional declaration for ‘country of harvest’ would not address the identified issue of false country of origin declarations on food labels. It does not provide any additional information to the consumer for spices defined by the spice commodity standards, as the country of origin is the same due to those standards’ scope (see answer to part (a)).</p> <p>The identified issue of false country of origin declarations on food labels is not a shortcoming in labelling requirements, but with compliance and enforcement with the requirement for food labelling to be true and accurate. Although the matter of dealing with false declarations is challenging, it is not addressed by requiring an additional declaration.</p> <p>Australia is concerned that introducing new labelling requirements to address compliance and enforcement issues with existing labelling requirements (country of origin) may set a precedent for establishing new labelling provisions to deal with future compliance and enforcement issues. Australia suggests that CCFL could consider refining CXS 1-1985 sub-section 4.5.2 to better define what processing might change a food’s nature. However, as noted in Australia’s response to part (a), this would not address the issue for spices (including saffron and vanilla), as spices that are intended for further industrial processing are out of scope of the CCSCH standards.</p>	<b>Australia</b>
<p>Requiring mandatory “country of harvest” labelling for spices could set a precedent that may extend to other products. Such a requirement could create logistical and enforcement challenges across various sectors, making it difficult to apply consistently and clearly.</p> <p>Moreover, the mandatory country of harvest labelling would be inconsistent with current Codex requirements and could lead to redundant and confusing information on labels, as the country of harvest is often the same as the country of origin.</p>	<b>Brazil</b>
<p>Canada’s understanding is that mandatory “country of harvest” labelling would introduce a new labelling requirement to address an issue that does not appear to be about a gap in labelling requirements, but about a problem of understanding, compliance with and enforcement of existing country of origin labelling. Mandatory “country of harvest” labelling would create burden for food business operators and competent authorities. It would introduce duplication in Codex texts, as country of origin and harvest are the same within the context of the spices and culinary herb standards. Furthermore, it would not remove the possibility that false and misleading origin statements (whether regarding country of origin or country of harvest) could continue to occur. The same issue that is currently occurring when country of origin is improperly declared could start to occur with a country of harvest statement. Further, as the potential impact of how this might affect the labelling for other harvested commodities, such as fruits and vegetables and grains, has not been examined, Canada cautions that this could introduce inconsistencies and confusion across Codex texts.</p> <p>The Codex Procedural Manual requirement for endorsement of deviations from general standard provisions (such as in the GSLPF) indicates that these must be fully justified and supported by available scientific evidence and other relevant information. There is no precedent for mandatory “country of harvest” in a Codex text, so for a provision to appear for the first time there would need to be sufficient justification and understanding of the terms. We understand from previous discussions that in most cases, the country of origin of culinary herbs and spices is the country of harvest. Many Codex members have commented similarly in the past. For this reason, the Procedural Manual requirements have not been met. The problem is not that the country of harvest is missing from the label – it is already required to be on the label through the country of origin requirement. We understand the problem is that the country of origin is, in some cases, labelled incorrectly, and so the true origin is not identified. CCSCH7, in its response to CCFL (Appendix II of f CX/FL 24/48/4), confirmed the two points in this paragraph as well.</p>	<b>Canada</b>

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>Canada reiterates that we see this to be a compliance and enforcement issue, not a requirements issue. It could create a duplicative and confusing framework if CCFL were to introduce or endorse new mandatory labelling requirements each time existing ones were not well understood or followed. As such, Canada opposes the introduction of an additional mandatory labelling requirement to solve a compliance and enforcement problem. This would create burden on industry and competent authorities and would not be an appropriate solution for the nature of the problem.</p> <p>When the problem relates to compliance and enforcement, there are other approaches that would be more suitable. These include introducing more explanation or guidance to clarify existing requirements, working with stakeholders to promote understanding of these requirements, and increasing compliance verification and enforcement activities. In this particular situation, Codex has an opportunity to introduce more explanation about existing country of origin provisions in texts in order to clarify how these apply to spices subject to CCSCCH standards.</p>	
<p>a) The CXS 1-1985 standard clearly defines the ‘country of origin’ and places emphasis on the stage of processing. Mandatory indication of the ‘country of harvest’ could lead to ambiguity if the latter is different from the country of origin. It may not always be clear what information takes precedence or how consumers should interpret both.</p> <p>While ‘country of harvest’ labelling advocates for greater transparency, there is a risk that consumers may misinterpret this information. For example, they may prioritise the place where it was harvested over the place where it is processed, even if this processing has significantly modified the food product. This could inadvertently create new causes for confusion in the consumer, something that the CXS 1-1985 standard aims to prevent. However, if the term ‘change in the nature of the food product’, which is not defined in the standard, were to be clearly defined, it would not be necessary to differentiate between country of harvest and country of origin for dried or desiccated culinary herbs and spices, as grinding, chopping, cutting, cleaning and packaging do not change the nature of the product.</p> <p>b) While the ‘country of harvest’ may provide additional information, careful consideration should be given to whether its mandatory inclusion is always necessary to prevent deception of consumers or whether it serves other purposes that fall outside the immediate scope of this section of the Codex standard.</p>	<b>Chile</b>
<p>We agree with the comments made in CCFL48 by the delegations that did not support mandatory declaration of the country of harvest, given that is a deviation from the existing provisions in standard CXS 1-1985. There is no internationally agreed definition of country of harvest, nor is there a scientific basis for verifying the ‘country of harvest’; therefore, this provision cannot be certified in a reliable manner. Codex does not have any scientific method to validate this requirement in a correct manner.</p>	<b>Colombia</b>
<p>From Costa Rica’s perspective, making the declaration of the country of harvest mandatory raises concerns about coherence with existing Codex texts, which currently only require the declaration of the country of origin. This requirement could not only create expectations around similar requirements in other standards and thus impact regulatory alignment, but could also significantly increase the burden on relevant authorities, as it would require additional verification processes that could be complex and difficult to effectively implement.</p>	<b>Costa Rica</b>
<p>The competent regulatory authorities have no concerns about requiring labels identifying the country of harvest. In fact, that support and increase transparency, protects the rights, and enhances the credibility of the exporting countries of such goods. This does not impair the identification of the final origin, especially if certain manufacturing processes have been carried out that have given it a new origin, according to the documents accompanying the shipment.</p>	<b>Egypt</b>

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>CXS 1-1985 requires that the country of origin must be indicated only if its omission was misleading.</p> <p>"4.5 Country of origin</p> <p>4.5.1 The country of origin of the food shall be declared if its omission would mislead or deceive the consumer.</p> <p>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."</p> <p>The EU has no concerns with respect to the mandatory requirement for “country of harvest” labelling.</p> <p>Concerns have been previously raised about the ability of border inspection officials to verify the country of harvest. However, if an international standard requires that the country of harvest is included on the label, this information should be available in the accompanying documents.</p> <p>Even if officials at the border inspection post cannot immediately verify the country of harvest, this information is traceable and can be confirmed should a claim or need arise.</p>	<b>European Union</b>
<p>The introduction of a mandatory indication of the ‘country of harvest’ would be challenging for manufacturers. Although this could lead to more transparency, there is also a risk of increased bureaucracy and possible confusion among consumers regarding the differences between ‘country of origin’ and ‘country of harvest’.</p> <p>Furthermore, it would be problematic for manufacturers if they had to frequently adapt their labels due to changing harvest countries. This would not only incur additional costs but would also mean that many labels that had already been produced would have to be discarded – a course of action that must be avoided for reasons of sustainability.</p>	<b>FoodDrinkEurope</b>
<p>Honduras does not support making the country of harvest a mandatory declaration for the following reasons:</p> <p>Possible conflict with the rules of origin used in trade agreements, which are based on criteria of substantial processing or value addition, not on the place of initial cultivation.</p> <p>CXS 1-1985 already adequately covers the country of origin, and adding an additional declaration could cause confusion among consumers and operators, potentially harming the latter in the application of tariff preferences.</p> <p>It could set an undesirable precedent, opening the door to similar requirements in other food categories without evidence of real benefit.</p>	<b>Honduras</b>
<p>According to section 2 of procedural manual: Elaboration of Codex standards and related texts: Format for Codex commodity standards: Labelling: the section should include all labelling provisions contained in the standard. Provisions should be included by reference to CXS 1-1985. The Section may also contain provisions which are exemptions from, additions to, or which are necessary for the interpretation of the general standard in respect of the product concerned provided that these can be justified fully. Accordingly, in all commodity standards format, there are additional provision regarding labelling such as name of food and information which shall appear in close proximity to name of food, date marking &amp; storage instructions.</p> <p>Further, both Country of Harvest &amp; country of origin are part of ‘Format of Standard’ adopted by CCSCH since beginning and the term “Harvest” has already been defined in the glossary of terms under the CCSCH. the requirement to declare country of harvest has always in the CCSCH standards which has been endorsed by CCFL.The</p>	<b>India</b>



<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>fifth session of CCSCCH, while discussing the labelling provisions (8.3 and 8.3.1) of Country of origin/Country of harvest, on the clarification sought by the CCFL45, had agreed to keep both provisions in the standards and split “Country of Origin/Country of Harvest” into two independent and clear provisions, i.e. a provision on “Country of Origin” being mandatory and a provision on “Country of Harvest” being optional; and that these provisions would be reconsidered in individual standards, should the need arise. This clarification was endorsed by the CCFL46 and also the relevant labelling proviso for the various spices refereed in this session. Therefore, mere declaring it as mandatory can’t be considered as precedent or inconsistency with CXS 1-1985.</p> <p>Keeping both the labelling provisions of country of origin and country of harvest as mandatory in the standard of high value spices like saffron &amp; vanilla is warranted, being a specific case and is also consistent with the decision taken in CCSCCH5 about assessing the need for these provision based on specific needs of SCH standards.</p>	
<p>"Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1- 1985."</p> <p>IOSTA Response: IOSTA expresses concern that the establishment of mandatory “country of harvest” labelling for vanilla and saffron would establish a precedent for all spices, which is inconsistent with current practices and would pose logistical challenges without improving product quality or purity.</p> <p>As stated, mandatory “country of harvest” labeling would pose significant challenges to spice manufacturers. Each year, changing climatic conditions impact spice harvests in different ways. As a result, spice buyers may diversify their origins to mitigate risks of poor harvests and manage price volatility. The inter- and intra-annual variation in weather conditions and harvest yield poses a logistical challenge for manufacturers, who would have to frequently adapt their labels in response to changing harvest countries. This may incur additional costs, and cause previously printed labels to be discarded.</p> <p>Moreover, some spice products are frequently blended. Saffron products, for example, rarely originate from a single source. Processors typically blend saffron from different regions to achieve the desired quality for the business, the market, and the consumer. In cases where the final batch has multiple origins, a mandatory “country of harvest” declaration may be confusing and mislead consumers about the product’s composition.</p>	<b>IOSTA</b>
<p>Making it mandatory to indicate the “country of harvest” for vanilla and other spices such as saffron could set a precedent for other agricultural products whose quality is closely linked to their origin, but this measure should be limited to high value-added products that are closely linked to the terroir.</p> <p>This requirement does not contradict Article 4.5 of CXS 1-1985, but reinforces it. CXS 1-1985 requires the country of origin to be indicated if its omission is likely to mislead the consumer. In the case of vanilla, not mentioning the country of harvest amounts to presenting the product in a misleading manner, as its quality is intrinsically linked to its origin. Mentioning only the country of processing (if different) would be misleading.</p> <p>The labeling of the country of harvest is essential for authenticity, preserving the unique characteristics linked to the terroir, combating fraud (blending of products, misrepresentation), promoting producers, and meeting consumers’ growing expectations in terms of transparency and traceability. This is a specific clarification that aligns with the objectives of the Codex on consumer protection and fair practices.</p> <p>It is important for Codex guidelines to clarify the distinction between the country of harvest and the country of processing or packaging, particularly for high-value artisanal agricultural products.</p> <p>It is necessary to add the definition of “country of harvest” to the glossary.</p>	<b>Madagascar</b>

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>New Zealand’s understanding is that when Country of Origin is used correctly for dried saffron this is the same as Country of Harvest. New Zealand considers that mandating the Country of Harvest for dried saffron in addition to the mandatory declaration of Country of Origin is redundant when Country of Origin is used correctly i.e. in line with the provisions of 4.5 in the <i>General Standard for the labelling of prepackaged foods</i> (CXS 1985-1) specifically 4.5.2<sup>9</sup>. Requiring Country of Harvest to be labelled would be onerous to industry and would set a precedent for how Codex deals with incorrect use of provisions.</p> <p>New Zealand notes that the <i>Standard for Dried Floral Part – Saffron</i> (CXS 351-2022) 3.2.2 Chemical and physical characteristics states that “There shall be no adulteration in the product” and that 4. Food additives states “No food additives are permitted in the Products covered by this Standard”. Based on this, we do not consider that saffron can be processed in a second country in a way that changes its nature, and therefore its Country of Origin. Therefore, New Zealand does not see that Country of Origin can ever (legitimately) be different from Country of Harvest for dried saffron.</p> <p>If the Country of Origin provisions in 4.5 of CXS 1985-1 are being incorrectly used, addressing the incorrect use of the provision (whether intentional or due to misunderstanding) should be the priority for Codex. New Zealand does not consider requiring additional labelling is the appropriate action here. It does not address the incorrect use of the Country of Origin provision (as we understand that is the key issue). New Zealand considers such action would set a precedent that when Codex provisions are being incorrectly (or fraudulently) used, correcting the fraud would not be addressed but rather added requirements would be used to mitigate the impact of the incorrect use of existing provisions.</p> <p>Requiring both Country of Origin and Country of Harvest to be labelled for dried saffron would deviate from the <i>General standard for the labelling of prepackaged foods</i> (CXS 1985-1) The Codex Procedural Manual (under Section 2.5 Relations between commodity committees and general subject committees <sup>10</sup>) sets out that any request for endorsement of deviations from general standard provisions in a commodity standard should be fully justified and supported by available scientific evidence and other relevant information. New Zealand does not consider that the response from CCSCCH has provided such justification.</p> <p>New Zealand considers that the development of guidance around the correct use of Country of Origin labelling could be useful to help ensure this provision is correctly applied.</p>	<b>New Zealand</b>
<p>Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</p> <p>The mandatory declaration of the "country of harvest" presents certain challenges, particularly for products such as spices that are often blended from multiple sources. Identifying a single harvest origin in such cases can be complex and may lead to difficulties in providing accurate labelling. Nevertheless, the importance of this information in promoting transparency, enhancing traceability, and supporting consumer trust remains significant.</p> <p>Saudi Arabia acknowledges that when reliable scientific tools and validated detection methods are available, such as DNA-based techniques supported by national</p>	<b>Saudi Arabia</b>

<sup>9</sup> 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

<sup>10</sup> Where commodity committees are of the opinion that the general provisions are not applicable to one or more commodity standards, they may request the responsible general subject committees to endorse deviations from the general provisions of the Codex Alimentarius. Such requests should be fully justified and supported by available scientific evidence and other relevant information

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
reference databases, they can play an important role in verifying the country of harvest. This could contribute to more accurate labelling practices, reduce the risk of misrepresentation, and strengthen integrity across the supply chain. Therefore, while ensuring alignment with international standards such as CXS 1-1985, there is value in exploring the gradual and science-based implementation of harvest origin declarations where feasible.	
Displaying the country of harvest as a mandatory requirement may not in line with CXS 1-1985. It can cause confusion to the use of CXS 1-1985 in future.	<b>Thailand</b>
<p>Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</p> <p>Uganda position: Firstly, introducing “country of harvest” as a mandatory clause creates inconsistencies with existing guidance from CSX 1-1985 and causes confusion regarding what constitutes “origin” especially for processed or value added products.</p> <p>Secondly, it sets a precedence that necessitates inclusion of the same in other standards for spices as well as other food categories, such as fruits, vegetables, or grains.</p> <p>Lastly, the scientific tools required to accurately verify the country of harvest are not widely accessible in many low and middle income countries, the very regions where most of these spices are cultivated.</p>	<b>Uganda</b>
<p>Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</p> <p>CCFL maintains robust labelling guidance applicable to all foods. The United States interprets the proposed requirement of mandatory “country of harvest” for dried saffron and vanilla (and other spices) as inconsistent with the longstanding approach taken by CXS 1-1985 regarding country of origin. This inconsistency is also proposed without scientific basis or regard for the principle of harmonization.</p> <p>Setting precedent:</p> <p>Allowing deviations from CCFL’s harmonized labelling guidance for any commodity, especially to enable trade protectionist policies with mandatory “country of harvest” declaration, introduces three unsettling precedents:</p> <ol style="list-style-type: none"> <li>1. the ability for commodity committees to undermine the general subject committees’ standards and contradict the principles upon which those standards are established;</li> <li>2. a departure from Codex’s mandate to ensure food safety and facilitate fair practices in the food trade, and;</li> <li>3. a degradation of Codex’s science-based approach to international standard setting by making decisions on the basis of economic value.</li> </ol> <p>Consistency issues:</p> <p>The CXS 1-1985, in its general principles, prohibits the use of false, misleading, or deceptive labelling as well as labelling that is likely to create an erroneous impression regarding its character. The CXS 1-1985 additionally establishes the conditions whereby the “country of origin” for the purposes of labelling would be changed: “when a food undergoes processing in a second country which changes its nature.”</p> <p>The introduction of mandatory “country of harvest” labelling into Codex labelling standards, where the “country of origin” and the “country of harvest” differ, would directly contradict this principle taken together with the “country of origin” labelling provision – that is, declaring country of harvest on a food that has undergone a change to its nature would likely create erroneous impression regarding the food’s character and thus not be permitted by the CXS 1-1985.</p>	<b>USA</b>

<b>e. Concerns or issues related to mandatory “country of harvest” labelling such as setting a precedent, and consistency with CXS 1-1985.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>Even in the case where a food has not undergone a change of nature and the “country of harvest” would be the same as the “country of origin”, declaring “country of harvest” would be, at best, duplicative, and at worst, would undermine consumer confidence in the product’s labelling.</p> <p>CCFL’s General Guideline on Claims (CXG 1-1979) is also based on the principle from CXS 1-1985 that no food should be described or presented in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect. Furthermore, claims that cannot be substantiated are expressly prohibited by the CXG 1-1979. With a mandatory “country of harvest” declaration, there is a significant risk that foods may be described in a manner that is false, misleading, or deceptive. And as provided in section “d.”, the United States highlights that “country of harvest” would likely be impossible to verify; therefore, as a claim that cannot be substantiated, “country of harvest” would not be permitted by CCFL’s foundational texts.</p>	

<b>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>Australia’s position is that requiring an additional declaration of the ‘country of harvest’ may create confusion around the existing requirement to declare the ‘country of origin’, which, for spices (including saffron and vanilla) is clearly also the country in which the product is harvested.</p> <p>Requiring an additional declaration of ‘country of harvest’ on spices has the potential to confuse consumers as to the meaning of the term ‘country of origin’ and lead them to believe it does not also encompass the ‘country of harvest’ when applied to minimally processed commodities such as these products. This has the potential to reduce consumer trust in labelling.</p>	<b>Australia</b>
<p>Making “country of harvest” labelling mandatory could negatively impact international trade by increasing complexity, costs, and delays at border controls. Customs authorities would need to verify this additional information, which may require more documentation and, in some cases, laboratory analysis, leading to longer clearance times and higher operational costs for importers and exporters.</p> <p>For products that are blended or processed across multiple countries, such as spices or coffee, it may be difficult or impractical to trace and verify the country of harvest for each component, especially in bulk shipments. This could lead to trade disruptions or rejection of shipments due to labelling inconsistencies.</p> <p>Additionally, requiring both country of origin and country of harvest on labels could create confusion, especially when both refer to the same place, resulting in redundant or unclear information for consumers. This lack of harmonization with existing Codex standards may also increase the risk of trade disputes and create undue/unnecessary barriers to market access, particularly for small producers and exporters in developing countries.</p> <p>We consider that there is no positive impact on the protection on human health that could possibly justify the negative impacts on international trade that were identified.</p>	<b>Brazil</b>
<p>A main objective of Codex is fair practices in trade. Fair competition in the market is supported by being able to easily compare products based on common information provided. This is one of the benefits in having mandatory labelling, and why accurate country of origin declarations are important.</p> <p>When country of origin is mis-declared, such as declaring the country of packaging of a spice as the origin instead of the country where it was harvested, this negatively impacts fairness in the marketplace. Whether this occurs due to lack of understanding of the labelling rules, or is intentional to hide the true origin of a product, Canada recognizes that this can occur and is a source of unfairness and misleading information in the market. This fundamental issue will not be fixed by adding a new requirement without addressing the original problem. If mandatory country of harvest is introduced without addressing the misuse of country of origin, unfair trading practices would remain, and could be exacerbated.</p> <p>As outlined above, a mandatory requirement for “country of harvest” would introduce burden on food business operators and competent authorities. Labelling would be less adaptive to supply chain shifts, resulting in more expenses to change labels and increased trade costs. These increased costs would likely be shifted to the consumer, which in turn could affect demand.</p>	<b>Canada</b>
<p>On the positive side, Chile believes that consumers could benefit from greater access to accurate and timely information regarding the origin of the products they purchase. This position is based on the premise that comprehensive knowledge about the origin of consumer goods allows consumers to make more informed and conscious purchasing decisions, considering factors such as quality, production standards, ethical and environmental implications, and support for local or regional economies. The initiative to promote greater transparency in product labelling and traceability is in line with the objective of empowering consumers and fostering a fairer and more</p>	<b>Chile</b>

<b>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>equitable market. This could encourage producers to improve their practices in order to highlight the origin of their crops.</p> <p>On the negative side, the import application process could be prolonged, delayed or extended (in terms of time) with regard to the process of obtaining a document certifying this information (country of harvest).</p>	
<p>We agree with the observations made in CCFL48 by delegations that did not support mandatory country of harvest declaration, with respect to the fact that economic value and possible issues of fraud cannot justify mandatory country of harvest provisions, which could inadvertently create barriers to trade, create additional burdens on food business operators and complicate prevention of fraud.</p>	<b>Colombia</b>
<p>Mandating the declaration of the country of harvest for products such as saffron and vanilla could create unnecessary complexities in the supply chain, increasing implementation costs and logistical requirements, with no clear benefits to the consumer.</p> <p>Furthermore, the inclusion of two or more indications of origin (country of harvest and country of origin) could lead to confusion in labelling, especially when the same ingredient comes from multiple countries. In such cases, questions would arise about how to represent this information in the list of ingredients, whether it would be necessary to indicate the proportion corresponding to each country of harvest, and whether this would imply adjustments to the traceability and control requirements and possible impacts on the trade and formulation of products.</p>	<b>Costa Rica</b>
<p>In general, Good Agricultural Practices (GAP) aim to ensure compliance with legal and commercial standards, particularly those related to food safety and quality, or even the application of standards imposed by specialized markets. They also aim to facilitate the entry of suitable products into the market and to avoid those that do not meet required conditions or contain pesticide residues, contaminants, or microbes. These principles are often based on consumer requirements and traceability requirements, which are considered among the most important measures to maintain food safety.</p> <p>The existence mandatory of a binding statement clarifying the country of harvest casts a positive shadow towards:</p> <ul style="list-style-type: none"> <li>• Raising awareness of good agricultural practices (GAP).</li> <li>• Protecting the production rights of producing countries and raising quality standards and grades. Significantly prevent or minimization of fraud.</li> <li>• Promoting transparency to consumers.</li> </ul>	<b>Egypt</b>
<p>Positives: Product protection, fraud prevention and maintenance of quality standards, as well as transparency, consumer trust and fair competition.</p> <p>Negatives: Potentially increase of bureaucracy and challenges for manufacturers to change their current labelling arrangements. Also, potential costs and administrative burden for enforcement bodies.</p> <p>However, in general, consumers often prefer products from specific origins because of the quality or reputation associated with that country's food products. Prices can vary significantly based on these factors. It is well-documented that growing conditions, such as soil, climate, and harvest methods, affect the final product for many commodities. Some may exploit these differences for economic gain by mislabelling high-priced spices, like saffron and vanilla, which can undermine consumer trust and disrupt international trade.</p>	<b>European Union</b>



<b>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
Thus, there is certainly a commercial interest in the issue, and it is important that the country of harvest, if different from the country of origin, is declared on the label.	
See previous comment in replies to question e.	<b>FoodDrinkEurope</b>
f) The imposition of mandatory declaration of the country of harvest could represent a technical barrier to trade, especially for exporting countries such as Honduras that send spices in bulk for further processing to third party countries. This obligation would impact competitiveness without any significant improvements in terms of information to the consumer.	<b>Honduras</b>
<p>Mandating the declaration of the “country of harvest” is expected to have a positive influence on trade. Rather than acting as a barrier, this requirement can enhance the global trade of premium and authentic spices such as saffron and vanilla by reinforcing their provenance and quality. It would empower consumers to make informed choices and foster greater trust in the products they purchase.</p> <p>For Food Business Operators (FBOs), this requirement is unlikely to pose any significant burden, as it primarily applies to producing countries known for high-quality spices, which would be responsible for issuing the ‘Country of Harvest’ certificate. Instead, it would offer an opportunity to differentiate high-quality products in the market, ultimately encouraging demand. Overall, the requirement is expected to promote transparency, support the trade of genuine products, and boost export potential for producing countries.</p>	<b>India</b>
<p>Mandatory labeling of the “country of harvest” would have mostly positive impacts for producing countries. It would add value to the origin, especially for products recognized for their superior quality, strengthening their position in premium markets and stimulating demand from consumers seeking authenticity and traceability.</p> <p>Recognition of the country of harvest would also promote greater transparency, better traceability, and fairer global trade, helping to combat fraud and deceptive practices and thus protecting legitimate producers. The requirement could encourage better agricultural practices.</p> <p>In the case of vanilla, whose reputation is based on origin, terroir, and craftsmanship, this requirement would enable consumers to make informed choices and ensure fair recognition and remuneration for producers.</p> <p>On the downside, it could lead to a slight increase in costs for exporters related to labeling systems and the risk of technical barriers if standards are not harmonized internationally, which could affect developing countries.</p> <p>However, for a high-value product such as vanilla, the benefits of added value, differentiation, and fraud prevention far outweigh the disadvantages.</p>	<b>Madagascar</b>
<p>Introducing a mandatory requirement for declaring the “country of harvest” could have both positive and negative implications for trade. On the positive side, it may enhance supply chain transparency, support consumer trust, and contribute to efforts in combating food fraud, particularly in high-value and frequently misrepresented products like spices. It could also provide a competitive advantage to countries known for the quality and authenticity of their agricultural products.</p> <p>While some operational challenges may arise, especially for blended or bulk-traded products, these can be addressed through gradual implementation, capacity building, and investment in traceability tools. With international cooperation and the development of practical, science-based solutions, such a requirement could lead to stronger market integrity and improved trade relationships rooted in trust and accountability.</p>	<b>Saudi Arabia</b>

<b>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
<p>Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.”</p> <p>The introduction of a mandatory indication of the ‘country of harvest’ would be challenging for manufacturers. Although this could lead to more transparency, there is also a risk of increased bureaucracy and possible confusion among consumers regarding the differences between ‘country of origin’ and ‘country of harvest’.</p> <p>Furthermore, it would be problematic for manufacturers if they had to frequently adapt their labels due to changing harvest countries. This would not only incur additional costs but would also mean that many labels that had already been produced would have to be discarded – a course of action that must be avoided for reasons of sustainability.</p>	<b>Tea &amp; Herbal Infusions Europe THIE</b>
<p>The impact on trade if “country of harvest” is a mandatory requirement may include:</p> <ol style="list-style-type: none"> <li>1. It is not easily verifiable by using analytical methods</li> <li>2. It may confuse consumers as there will be two origin labels presented on the label</li> <li>3. It will be a burden to producers in labelling or countries of harvest if they use several sources of spices</li> <li>4. It cannot effectively prevent fraudulent practice. Instead, it may increase fraud by labelling the country of harvest, whereby it is known to have high-quality spices, but in reality, mixing the spices with other sources.</li> </ol>	<b>Thailand</b>
<p>a). Potential Positive Impacts on Trade</p> <p>i). Enhanced Traceability</p> <p>Mandatory “country of harvest” labelling improves supply chain transparency, allowing consumers and regulators to trace products back to their origin.</p> <p>ii). Promotion of Heritage and Authenticity</p> <p>Spices often carry cultural and historical value. Declaring the country of harvest helps preserve this authenticity and supports geographical branding, which can add value to products.</p> <p>iii). Market Differentiation and Premium Pricing</p> <p>Countries with a strong reputation for certain spices may benefit from higher demand and pricing when origin is clearly labelled, fostering fair competition.</p> <p>iv). Support for Local Economies</p> <p>Accurately attributing origin allows developing countries to gain recognition and economic benefit for their raw materials, encouraging investment in agricultural sectors.</p> <p>b) Potential Negative Impacts on Trade</p> <p>i). Market Bias and Discrimination</p> <p>Products from certain countries may be unfairly devalued due to perceived lower quality, regardless of actual product standards.</p> <p>ii). Increased Trade Complexity and Costs</p> <p>Enforcing and verifying “country of harvest” labels would require investment in documentation, certification, and possibly laboratory testing—burdensome for small-scale traders and low-income countries.</p> <p>iii). Disruption During Supply Transitions</p>	<b>Uganda</b>

<b>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
<p>Production often involves blending spices from different harvests or countries. Requiring batch specific country-of-harvest labels can complicate manufacturing and lead to supply chain inefficiencies.</p> <p>iv). Potential for Trade Disputes</p> <p>Countries may interpret “country of harvest” differently, creating non-tariff barriers or sparking conflicts over label legitimacy.</p> <p>v). Encouragement of Fraud or Mislabelling</p> <p>If origin influences market value, unscrupulous actors may be incentivized to falsely label products. For example, spices from Country C may be relabelled as originating from a more marketable Country D within a regional trade agreement to avoid tariffs.</p>	
<p>f. Potential positive or negative impacts on trade should “country of harvest” be a mandatory requirement.</p> <p>Mandatory “country of harvest” labelling would result in negative impacts on trade. The United States is concerned that mandatory “country of harvest” declaration would be used to legitimize protectionism and create unfair trading conditions through the unsubstantiated application of “country of harvest” claims to create an erroneous impression of a commodity’s safety, quality, or value.</p> <p>Furthermore, mandatory “country of harvest” labelling risks undermining the authoritativeness of and confidence in the existing, proven “country of origin” labelling system by either duplicating the same information or introducing confusion and contradiction where “country of origin” is comprehensive and appropriately informs consumers with regard to the origin of the food product. In this respect, mandatory “country of harvest” labelling threatens the existing principles that govern harmonized labelling and trade practices by enabling the misuse of “country of harvest” claims to create artificial value for certain producing countries over others, directly undermining Codex’s mandate to facilitate fair practices in the food trade.</p> <p>Also concerning with regard to both the food trade and food safety is the lack of reliable and validated methods to verify a mandatory “country of harvest” provision. This means that harmonized substantiation for mandatory “country of harvest” declaration would be impossible, including certification of the product and its associated labelling. The establishment of a mandatory “country of harvest” declaration could inadvertently lead to increased fraud as it is almost impossible to verify country of harvest and is especially being considered in cases of spices with high economic value, creating an additional vulnerability for fraudulent labelling and further increasing the likelihood that these commodities be vulnerable to fraud.</p> <p>Due to the inability to verify mandatory “country of harvest”, countries that find the provision to be burdensome or risky to implement, or in conflict with their national inspection regulations, will not implement the standard, degrading the value of Codex standards and negatively impacting harmonization and trade by increasing the risk of trade disputes.</p>	<b>USA</b>

<b>g. Any other information relevant to the labelling provisions for spices including saffron and vanilla.</b>	
<b>REPLIES</b>	<b>MEMBER OBSERVER</b> /
Nil.	<b>Australia</b>
<p>The indication of the “country of harvest” can be provided voluntarily when relevant to the commercial value of the product and agreed upon between buyer and seller, particularly for high-value spices like saffron and vanilla. This approach is aligned with the definition provided by General Guideline on Claims (CXG 1-1979) and allows flexibility in the market without imposing unnecessary regulatory burdens.</p> <p>Specifying the country of harvest confers no real benefit to international trade or public health. Brazil recognizes that citing the country of harvest serves primarily as a marketing claim to enhance the product's appeal and perceived value, rather than offering any genuine advantage to trade or health protection.</p> <p>It is also important to note that eleven existing Codex standards developed by CCSCH already include the country of harvest as optional information. Maintaining this approach supports consistency across standards and aligns with the principle of providing information that is meaningful, verifiable, and not misleading to consumers.</p>	<b>Brazil</b>
<p>Mandatory labelling requirements are generally in place to provide essential health and safety information for consumers and to enable informed purchasing decisions by providing basic product information such as the name, quantity, ingredients, and allergens present in a food. Food business operators must adhere to these requirements uniformly, which contributes to fair trading practices.</p> <p>Mandatory labelling is not generally in place to promote certain characteristics of a food, whether these relate to quality characteristics, economic value, ethical considerations, or other attributes. These characteristics can be labelled optionally, provided the information is true and not misleading. Food business operators are free to promote various characteristics of their products voluntarily if they believe this may contribute to consumer interest and sales. For example, if a company wishes to promote a rice seasoning mix by highlighting that the saffron in the mix is from a specific country, this is an option available. If a company wishes to highlight a particular growing region where a spice was harvested, it may do so also. Voluntary claims to promote the sale of foods and respond to consumer demand exist within the current labelling framework, serve a different purpose than mandatory labelling requirements, and are the appropriate tool for those companies that wish to highlight regional characteristics of foods.</p> <p>It is also important to consider the work of other relevant committees. CCFICS texts include provisions relevant to this issue, for example:</p> <ul style="list-style-type: none"> <li>• The Guidelines for Food Import Control Systems (CAC/GL 47-2003) outline information about food imports that is important when entering a jurisdiction, which includes information about country of origin. Among other benefits, the availability of origin information through import documentation facilitates accurate origin labelling as foods move through the supply chain.</li> <li>• The Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CAC/GL 60-2006) – provides principles for the use of traceability as a tool to address food hazards and deceptive practices. There is current CCFICS work ongoing to update this text, including more emphasis on traceability as a tool in fraud prevention.</li> </ul> <p>The above texts, and the systems and tools they describe, factor into the solution to this issue.</p>	<b>Canada</b>
Chile has no further observations on this matter.	<b>Chile</b>
No comments	<b>Colombia</b>
In Costa Rica's view, the mandatory inclusion of country of harvest in the labelling of saffron and vanilla is not duly justified, since the objectives of fraud prevention and ensuring authenticity can be achieved more effectively and efficiently through the application of traceability tools and appropriate controls. In this regard, voluntary	<b>Costa Rica</b>

<b>g. Any other information relevant to the labelling provisions for spices including saffron and vanilla.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
labelling of the country of harvest, as already permitted in other CCSCS standards, is considered a more appropriate and flexible option.	
In addition to the labelling requirements mentioned in the General standard for the labelling of pre-packaged foods (CXS 1-1985), the country of harvest labelling and Precautionary Allergen Labelling (PAL) prefer to add.	<b>Egypt</b>
While the EU has no more information to add, it is important to insist on concepts previously mentioned:  In Codex, the indication of the country of origin is mandatory for fresh fruits and vegetables and most spices.  In the case of saffron, the country of “origin” shall always correspond to the country of “harvest”. Thus, this equivalence should be explicitly mentioned in the standard  For vanilla, the situation might not be the same, as this spice can undergo processes that change its nature, in countries other than where it was harvested. Only in such cases, the declaration of the country of harvest, in addition to the country of origin, should be mandatory.  All spice standards include the country of harvest, offering the flexibility to make its labelling optional or mandatory. This shows that the concept of the country of harvest is well understood and should be mandatory in those standards and circumstances where there is valid reason to do so.	<b>European Union</b>
It is questionable which real added value there is for a consumer in knowing the country of harvest of spices that are sometimes rather exotic. Quality and purity are the real added value of those commodities, which cannot be improved through provisions on country of origin.	<b>FoodDrinkEurope</b>
Honduras reiterates its commitment to transparency in labelling and to the Codex Alimentarius, but is of the opinion that the solution to fraud and traceability should be sought in effective controls and not in the mandatory labelling of the country of harvest.	<b>Honduras</b>
CCSCS may consider defining “Country of Harvest” in addition to ‘Harvest’ term, once this provision is recommended by CAC.	<b>India</b>
IOSTA encourages that emphasis be placed on the purity and quality of a spice product, which is not impacted and cannot be improved through mandatory “country of harvest” labelling.	<b>IOSTA</b>
Mandatory labeling of the “country of harvest” for vanilla goes beyond simple traceability and the fight against fraud; it can encourage the adoption of more sustainable agricultural practices and promote fair trade, directly benefiting farmers and their communities.  Consumers are increasingly concerned about the origin of the products they buy. Indicating the country of harvest allows them to make informed choices, taking into account their ethical, environmental or quality preferences. This can boost consumer confidence in products and brands that demonstrate complete transparency. It is a response to new consumer expectations for products sourced from responsible and sustainable practices.  In addition, knowing the country of harvest is crucial for food safety, ensuring authenticity (by detecting blending with synthetic or chemically treated vanilla) and making it easier to identify health risks associated with local practices to facilitate targeted recalls of contaminated batches.  Finally, it helps to strengthen control systems (inspections, SSA audits) and combat theft and illegal blending in vanilla producing countries such as Madagascar.  Madagascan vanilla is cultivated, selected, processed, and refined entirely by hand by thousands of rural families. This manual expertise, combined with a unique	<b>Madagascar</b>

<b>g. Any other information relevant to the labelling provisions for spices including saffron and vanilla.</b>	
<b>REPLIES</b>	<b>MEMBER / OBSERVER</b>
ecosystem, makes our vanilla an exceptional product. Not declaring the country of harvest not only hides the identity of the product, but also erases its cultural and human heritage.	
Saudi Arabia highlights the importance of developing clear and internationally harmonized labelling provisions specific to spices, including high-value products such as saffron and vanilla. Labelling provisions should ensure that consumers receive accurate information not only about the country of origin but also about the nature of the product, including whether it is pure, blended, or derived from extracts.	<b>Saudi Arabia</b>
Any other information relevant to the labelling provisions for spices including saffron and vanilla."  It is questionable which real added value there is for a consumer in knowing the country of harvest of spices that are sometimes rather exotic. Quality and purity are the real added value of those commodities, which cannot be improved through provisions on country of origin.	<b>Tea &amp; Herbal Infusions Europe THIE</b>
Additional information or suggestions:  The definitions or activities of the country of origin and country of harvest should be clearly defined to ensure a consistent understanding among businesses, inspectors, and consumers. Additionally, clear verification methods for adulteration should be established. Furthermore, minimum purity criteria for products should be considered for country of harvest labelling.	<b>Thailand</b>
Both saffron and vanilla have been traded for thousands of years and for decades "country of origin" labelling has governed this trade. Voluntary labelling of "country of harvest" has been used at the discretion of producers where useful for specific sales contracts. There is little evidence that a global, mandatory standard for "country of harvest" declaration would be beneficial to trade; rather, the contrary would likely be the case considering the risk to fair practices in trade and the potential for increased fraudulent labelling.  Consumers may be confused by a "country of harvest" declaration as it is not in common use and there is not broad understanding of the term, especially with relation to "country of origin". The United States is concerned that establishing a duplicative, or even competing, claim of origin would risk degrading consumer confidence in labelling.  As far as the United States is aware, there is no precedent in Codex for setting standards based on the economic value of a commodity, rather than its safety or quality, and especially no precedent that gives certain producing or harvesting countries a trading advantage over others. Indeed, Codex standards seek to set harmonized safety and quality parameters, and labelling standards, that consider the production conditions of all countries and give all countries the ability to trade and sell their product fairly. A mandatory "country of harvest" labelling standard is not in line with Codex's mandate or its principles.	<b>USA</b>