

# CCSCH8

## SCH08/CRD28

## Codex Committee on Spices and Culinary Herbs

**Agenda item 2.1**

Codex Secretariat  
October 2025

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

**CRD7 (Australia, Canada, EU, Kenya); CRD17 (USA), CRD18 (India);  
CRD19 (Morocco); CRD20/21 (Mexico); CRD25 (Senegal); CRD26  
(Nigeria)**

Guwahati  
India

## Background

- CCSCH6 (2022) forwarded the draft standard for Safron to the Commission for adoption and the labelling provisions to CCFL for endorsement.
- CCFL47 (2023) endorsed most of the labelling provisions except:
  - i. The Country of Harvest (COH), and
  - ii. The Country of Origin (COO); requesting clarification from CCSCH.
- CCSCH7 (2024) noted the definition for COO in CXS 1-1985, and the lack of a Codex wide definition for COH and forwarded a reply to CCFL.
- CCFL48 (2024) endorsed COO but could not reach consensus on COH and referred the issue to CCEXEC87 and CAC47.



## Decision of CAC47 on COH/COO

- CAC47 (2024) supported CCEXEC87's recommendation to seek inclusive and efficient solutions and took the following decisions:
  - a) requested Codex Secretariat to issue a Circular Letter (CL) to collect stakeholder input on COH labelling (Ref. CL 2025/07-FL).
  - b) established an EWG, to report to CCFL49, to review the responses and propose options for COH labelling alongside COO
  - c) Tasked CCSCH8 to review the compiled responses and providing observations to CCFL49.

## Questions (issues) covered under CL 2025/07-FL

The CL covered the following 7 broad questions:

- Relationship between COO, processing of spices and change in nature of spices
- Experiences and examples on misleading labelling of spices
- Fraudulent declaration of origin of spices
- Inspection, verification and enforcement activities of COO and COH
- Concerns on mandatory labelling of COH
- Potential impacts of mandatory labelling of COH
- Any other relevant information for labelling provisions of spices, including saffron and vanilla.



## Broad summary of responses to the CL

### a) Relationship between COO, processing of spices and change in nature of spices

- ✓ Drying, grinding, milling, blending or packaging are not “substantial transformations” under CXS 1-1985; the country of harvest remains the country of origin.
- ✓ Only industrial processes yielding extracts or new products (e.g., vanilla extract) change origin labelling.
- ✓ CCSCH standards exclude industrial processing; its glossary clarifies that “further processing” (cleaning, grinding, packaging) does not alter the food’s nature under spice commodity standards.

## Broad summary of responses to the CL

### b) Examples of misleading origin labelling

- ✓ A study found over 50% of saffron labelled “Spanish” actually originated from Iran, Morocco or India. Spanish authorities dismantled a network selling Iranian saffron as “Azafrán de La Mancha” under DOP.
- ✓ Spices repackaged in third countries and relabelled to declare the secondary country as origin. Blending spices from multiple origins without clear “blend of Country A and Country B” labels can mislead consumers.

## Broad summary of responses to the CL

### c) Challenges of fraudulent or false declarations of Origin

- ✓ High-value spices like saffron and vanilla are prone to adulteration and origin fraud. Complex, multi-country supply chains and fragmented documentation facilitate mislabelling.
- ✓ Analytical methods (e.g., isotopic tests) are costly and impractical for routine enforcement.
- ✓ Online marketplaces lack effective oversight, enabling unverified claims. Traceability gaps and absence of standardized detection methods further hamper fraud prevention.

## Broad summary of responses to the CL

### d) Inspection and Enforcement

- ✓ Authorities rely on documentation—certificates of origin, phytosanitary certificates, bills of lading—plus visual label inspections. Routine physical inspections and sampling focus on safety/hygiene, not origin authentication. No practical mechanism exists to verify COH beyond paperwork.
- ✓ Examples of inspection include use of: i) import permits (CDA, UyD), sanitation certificates, and label compliance checks (Chile); ii) export sanitary certificates, physical inspections and lab analyses (Colombia); iii) use of TRACE and Audits though COH is not defined (EU); and other have no COH in their requirements and only enforce COO.





## Broad summary of responses to the CL

### e) Mandatory labelling of COH

- ✓ Comments against mandatory labelling of COH: note that it duplicates COO, risks consumer confusion, sets a precedent beyond spices, may introduce technical trade barriers under WTO TBT rules, and imposes costs on producers and regulators with no clear safety benefit.
- ✓ Comments in support of mandatory COH for premium spices - to deter fraud and enhance transparency noting the need for a clear COH definition in Codex glossary and proportional application only to relevant products.

## Broad summary of responses to the CL

### f) Potential Trade Impacts

- ✓ *Positive:* greater supply-chain transparency; enhanced traceability; prevention of mislabelling in high-value spice markets; support for geographical branding; potential premium pricing for single-origin products.
- ✓ *Negative:* increased compliance and certification costs; supply-chain complexity for blended or multi-origin batches; longer border-control delays; risk of non-tariff barriers and trade disputes; consumer confusion from dual origin labels; may spur new fraudulent COH claims; burdens small producers in developing countries disproportionately.



## Broad summary of responses to the CL

### g) Other Relevant Information

- ✓ COH labelling can remain voluntary and is already included as optional information in many CCSCH standards. Producers may use it commercially where relevant.
- ✓ CCFICS texts (*Guidelines for Food Import Control Systems* (CXG 47-2003)), and *Principles for Traceability / Product Tracing as a Tool Within a Food Inspection and Certification System* CXH (60-2006) provide frameworks for fraud prevention and documentation but do not define COH. An updated traceability guideline and guideline on food fraud are underway to bolster fraud controls.

THANK YOU FOR YOUR ATTENTION

Contact information: