

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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World Health
Organization

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Agenda Item 2.1, 4, 4.1, 5, 6, 7, 8.1, 8.2

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

Forty-ninth Session

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COMMENTS FROM GHANA

Agenda item 2.1: The use of “country of harvest” in addition to the mandatory declaration of country of origin in food labelling of spices

Position

Ghana supports referring Conclusions 1-9 to CCSCCH, as they provide a comprehensive framework of key labelling principles for determining commodity-specific origin labelling, ensuring consistency, clarity, and transparency across commodities. Ghana also supports convening a workshop or side event at CCSCCH on labelling, led by CCFL, to enhance understanding of horizontal labelling provisions such as COO, COH, and “change of nature”. This would strengthen coordination between committees, support capacity building, and promote consistent, science-based interpretation of Codex texts, improving efficiency in developing and endorsing standards. Ghana considers that Conclusion 3 provides sufficient and practical guidance on what constitutes a “change of nature” for determining country of origin. Ghana supports the interpretation that processes creating a new and distinct product constitute a change, while routine processes (sorting, grading, packaging) do not. This aligns with Codex texts, particularly the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), and provides adequate clarity without the need for further guidance. Ghana supports Conclusion 6 that “country of harvest” is generally understood as where a product is grown and collected and does not require further definition. Ghana also agrees that CCFL is not the appropriate body to define it, as its mandate is horizontal labelling; any definition, if needed, should be addressed by relevant commodity committees with technical expertise. Ghana is of the view that it may be valuable to explore work on clarifying labelling of blends of a single spice from multiple origins to enhance transparency and support fair trade. An interested Member could submit a proposal under Future Work outlining scope, objectives, and benefits to guide further discussion and alignment with existing frameworks.

Conclusions of the EWG provide sufficient clarity to finalize Section 8.2 without introducing unnecessary complexity and the proposed Text and may read as follows;

8.2 Country of Origin

8.2.1 The country of origin of saffron shall be declared in accordance with Section 4.5 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).

8.2.2 Where saffron has undergone processing in a second country that results in a change in its nature, the country in which such processing occurs shall be considered the country of origin for the purposes of labelling.

8.2.3 Where saffron has not undergone a change in nature, including operations such as drying, sorting, grading, or packaging, the country of harvest shall be considered the country of origin.

8.2.4 The declaration of country of origin shall not be false, misleading, or deceptive, in accordance with Section 3 of CXS 1-1985. In particular, the country of packaging shall not be declared as the country of origin unless a change in nature has occurred.

8.2.5 Where saffron in a package originates from more than one country, all countries of origin may be declared.

8.2.6 The declaration of country of harvest may be provided as voluntary information, provided such declaration complies with Codex labelling provisions and is not misleading.

Rationale

Ghana's is of the opinion that there is need to resolve the current matter in a way that is coherent with existing Codex texts, avoids unnecessary complexity, and remains practical for implementation by Members. The EWG conclusions already provide a workable basis for distinguishing COO from COH and for clarifying the role of

“change of nature” in determining origin for labelling purposes. On that basis, Ghana considers that Section 8.2 can be finalized without reopening broader definitional questions that may be more appropriately addressed, where necessary, by commodity committees.

Ghana also maintains that a voluntary approach to COH remains the more practical and proportionate option. This preserves transparency while avoiding unnecessary rigidity and implementation burdens in supply chains where harvest, processing, packing, and blending may occur across different locations. A voluntary approach therefore supports clarity and flexibility, while remaining consistent with the broader Codex objective that labelling should not be false, misleading, or deceptive.

Agenda item 4:

CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT): CX/FL 26/49/4

Position

Ghana supports the endorsement of the seven (7) draft labelling provisions forwarded to CCFL.

- i. draft standard for fresh curry leaves to CAC for adoption at Step 5/8
- ii. draft regional standard for quick-frozen dumplings (Asia) to CAC for adoption at Step 8.
- iii. draft regional standard for maamoul (Near East) to CAC for adoption at Step 8
- iv. draft standard for spices derived from dried or dehydrated fruits and berries - Requirements for vanilla to CAC for adoption at Step 8
- v. draft standard for spices derived from dried or dehydrated fruits and berries - Requirements for vanilla to CAC for adoption at Step 5/8
- vi. draft standard for spices in the form of dried seeds - requirements for coriander to CAC for adoption at Step 5/8
- vii. draft standard for herbs - Requirements for sweet marjoram to CAC48 for adoption at Step 5

Rationale

All draft labelling provisions are aligned with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and the General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021).

Agenda item 4.1:

CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT) (CCFO): CX/FL 26/49/4 ADD.1

Position

Ghana supports the advancement of the Draft Standard for Microbial Omega-3 Oils to CAC49 at Step 5, including its labelling provisions as aligned with relevant Codex texts, and considers the requirements for scientific nomenclature; non-retail container labelling under CXS 346-2021, and mandatory declaration of EPA and DHA content as appropriate for ensuring transparency, traceability, and consumer protection. However, implementation should remain feasible for regulatory systems in developing contexts, that analytical requirements should be practical and method-validated, and that any country-specific labelling requirements must be applied in a manner consistent with Codex principles to avoid unnecessary trade barriers and ensure harmonisation.

Rationale

The draft standard promotes harmonised, science-based labelling requirements for microbial omega-3 oils, enhancing consumer protection and fair trade. The inclusion of genus-level identification improves product authenticity and traceability, while alignment with existing Codex standards ensures regulatory consistency. Mandatory declaration of EPA and DHA content supports informed consumer choice.

Agenda item 5:

ANNEX TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING (PAL) (STEP 7):

Position

Ghana supports cross-reference to the General Standard for the Labelling of Prepackaged Foods for PAL requirements and footnotes. Ghana also supports the 4 mg threshold for gluten in cereal-based commodities

and calls for the need to have more consumer information on labelling requirements at food purchase points. In this view, Ghana supports advancement of the annex on precautionary allergen labelling guidelines from Step 7 to Step 8 and supports removal of footnote and review of text on language acceptability and general criteria

Rationale

The RfDs were established on the basis of risk-based principles, derived from global clinical data characterising reactions to known quantities of proteins from allergenic foods, and set at exposure levels intended to limit appreciable health risks or adverse reactions in sensitive individuals. Sections 8.1.1, 8.1.2, 8.1.3 and 8.2 of the General Standard for the Labelling of Prepackaged Foods meet the specific requirements for PAL

Agenda item 6:

AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1- 1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS (STEP 4):

Position on Specific Sections

Section 4.2.1-Name of the Food

Ghana supports provisions ensuring that the name of the food is clearly indicated on both the multipack and, where appropriate, individual units to avoid consumer confusion, particularly for mixed or assorted products.

Section 4.3.4- List of Ingredients

Ghana supports strengthened provisions requiring clear ingredient information on either outer packaging or individual units, with flexibility where repetition is impractical, provided consumer access is maintained.

Section 4.7.1- Date Marking

Ghana supports provisions ensuring appropriate date marking on multipacks and/or individual units, including guidance where individual units may not carry full date information, given food safety considerations.

Section 8.1.3.1- Labelling of Non-Retail Containers / Multipacks

Ghana supports provisions to ensure that essential labelling information is available on multipacks, including those not intended for direct retail sale, to maintain traceability and protect consumers across the supply chain.

Position on Text in Square Brackets (Section 8.1.3.1)

Ghana recommends that the bracketed text be retained only if it adds clear value and clarity, and does not duplicate existing provisions or impose unnecessary burdens, particularly on SMEs. If redundant, it should be removed.

Scope Clarification (Inner Packages Not Intended for Individual Sale)

Ghana supports excluding inner packages not intended for individual sale from the scope, while emphasizing that such units must comply fully with GSLPF if sold individually. Consideration should also be given to informal market practices and the need for practical guidance.

Position

Ghana supports the proposed draft amendments to Sections 4.2.1, 4.3.4, 4.7.1, and 8.1.3.1 of the GSLPF. The region recognizes the increasing importance of multipack formats and the need for clear, harmonized, and practical labelling provisions to enhance consumer protection, transparency, fair trade, and consistency across Codex standards. Ghana supports advancement of the draft to Step 5, subject to further refinement, with emphasis on clarity, practicality, avoidance of duplication, and consideration of Ghanaian market realities.

Rationale

The proposed amendments are necessary to strengthen consumer protection, improve transparency, facilitate fair trade, and ensure consistent application of labelling requirements across jurisdictions.

Agenda item 7:

GUIDELINES ON APPLICATION OF FOOD LABELLING PROVISIONS IN EMERGENCIES (STEP 4): CX/FL 26/49/7

Position

Ghana commends the EWG for developing the draft Guidelines on application of food labelling provisions in emergencies. However, notes a gap in the draft, namely the lack of explicit consideration for vulnerable population groups when applying labelling flexibilities. Ghana therefore proposes adding a clause under Section 3.1 requiring consideration of impacts on vulnerable groups, including infants, young children, and pregnant or breastfeeding women. This is necessary as these groups rely on highly sensitive foods, where labelling deviations can have immediate health consequences, and therefore have a lower tolerance to risk.

Rationale

This is in recognition of the importance of the guidelines in providing risk-based guidance to maintain food safety, prevent misleading information, and support a safe food supply during emergencies

Agenda item 8.1:

PROPOSAL FOR NEW WORK ON THE APPLICATION OF FOOD LABELLING PROVISIONS TO ALCOHOLIC BEVERAGES: CX/FL 26/49/8 ADD.1

Position

While Ghana would have welcomed the opportunity to take credit for the drafting of this proposal, Ghana was not involved in its drafting process. Nevertheless, Ghana commends the other African countries for their efforts and contributions in drafting the proposal. Ghana also recognizes the public health relevance of alcohol consumption and the possible value of greater clarity in the application of Codex labelling provisions to alcoholic beverages. At the same time, views within the Ghana are not yet uniform on the appropriate scope and content of such work. While some Members see merit in advancing new work in this area, others favour a more cautious approach, particularly in relation to elements that may extend beyond harmonised labelling provisions into matters that are more appropriately determined at national level.

Rationale

Ghana's position reflects both the legitimate interest of a number of African countries in strengthening the Codex treatment of alcoholic beverage labelling and the equally legitimate concerns of other African countries regarding the breadth and implications of the proposed work. The issue is therefore not whether the subject matter is important, but whether all of the proposed elements are equally suitable for Codex harmonisation at this stage.

A measured approach is warranted because alcoholic beverage labelling touches on areas where international guidance may be useful for improving clarity, transparency, and consistency, but it also intersects with questions of public health policy, national legislation, consumer communication, and enforcement capacity that vary considerably across countries. For that reason, Ghana considers that further discussion should help distinguish those aspects that may appropriately benefit from Codex guidance from those that should remain under the authority of national governments.

Agenda item 8.2:

PROPOSAL FOR NEW WORK ON A GUIDING DEFINITION FOR A MORE UNIFORM APPLICATION OF LABELLING PROVISIONS TO "SMALL PACKAGES" AND THEIR RELATED EXEMPTIONS SET IN EXISTING CODEX TEXTS: CX/FL 26/49/8 ADD.2

Position:

Ghana thanks the International Chewing Gum Association (ICGA) for preparing the discussion paper and supports the proposal for new work, subject to the following comments:

- i. **Metric Consistency:** Ghana request that any new definition for "small packages" remains consistent with the existing \$10cm² threshold for "small units" to avoid confusing manufacturers.
- ii. **Safety Priority:** There is need to explicitly state that allergen declarations and date markings shall not be exempted, regardless of package size.
- iii. **Data Inclusivity:** Ghana encourages the Electronic Working Group (EWG) to take into account the packaging formats commonly used across different regions, including sachets and other small-format packaging widely used in Ghana markets, when considering how surface area and labelling feasibility are assessed.

Rationale:

Ghana supports this new work because the absence of a clear and internationally understood definition of "small package" creates regulatory uncertainty and uneven interpretation across jurisdictions. That lack of clarity can lead to inconsistent labelling requirements, uneven enforcement, and avoidable difficulties for competent authorities and food businesses, particularly small and medium-sized enterprises that rely heavily

on low-cost, small-format packaging.

A Codex-guided definition would promote greater harmonisation in the application of food labelling provisions, support fairer and more predictable trade conditions, and reduce the risk that products are treated differently across markets simply because of divergent national interpretations. For Ghana, this is especially important in the context of growing intra-African trade, expanding informal and semi-formal retail channels, and the widespread use of small retail packaging formats designed to meet affordability and accessibility needs.

Ghana appreciates the work done by the eWG chaired by Australia and co-chaired by the United Kingdom and the United States of America. We support the advancement of the annex to the GSLPF to step 5 provided the committee can reach a consensus on the proposed texts in 4.2 and 4.3.

Ghana supports the provision of further advice to CCFH to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) with the revision to the GSLPF and the guidelines on the use of PAL.