

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT)

Comments by Burundi, India, Kenya, Nigeria, Rwanda, Thailand, United Republic of Tanzania

Burundi

Burundi supports the endorsement of labelling provisions forwarded by the relevant Codex committees, including CCFFV, CCASIA, CCNE, CCSCH and CCFO as well as commodity-specific standards covering fresh curry leaves, vanilla, large cardamom, coriander, sweet marjoram, and microbial omega-3 oils.

Burundi notes that such provisions should remain fully aligned with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), updated Codex templates, and established commodity-specific layouts, to ensure coherence, avoid duplication, and facilitate consistent interpretation and enforcement by competent authorities.

Burundi considers these labelling provisions important for reducing fraud and mislabelling, strengthening traceability, and supporting food safety systems across domestic, regional, and international markets. In this regard, the Burundi supports maintaining clarity, proportionality, and practical relevance in origin-related declarations, including that Country of Harvest should, where included, remain optional rather than mandatory unless a clear commodity-specific justification is established.

This approach will enhance consumer confidence, fair practices in trade, and regulatory consistency across Codex standards.

India

India supports endorsement of labelling provisions forwarded by CCFFV, CCASIA, CCNE, CCSCH and CCFO.

Kenya

Kenya supports the endorsement of labelling provisions forwarded by the relevant Codex committees, including CCFFV, CCASIA, CCNE, CCSCH and CCFO as well as commodity-specific standards covering fresh curry leaves, vanilla, large cardamom, coriander, sweet marjoram, and microbial omega-3 oils.

Kenya notes that such provisions should remain fully aligned with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), updated Codex templates, and established commodity-specific layouts, to ensure coherence, avoid duplication, and facilitate consistent interpretation and enforcement by competent authorities.

Kenya considers these labelling provisions important for reducing fraud and mislabelling, strengthening traceability, and supporting food safety systems across domestic, regional, and international markets. In this regard, Kenya supports maintaining clarity, proportionality, and practical relevance in origin-related declarations, including that Country of Harvest should, where included, remain optional rather than mandatory unless a clear commodity-specific justification is established.

This approach will enhance consumer confidence, fair practices in trade, and regulatory consistency across Codex standards.

With respect to commodity-specific standards, Kenya supports the endorsement of labelling provisions advanced by the relevant Codex subsidiary bodies, including those relating to fresh fruits and vegetables, regional products such as quick frozen dumplings, spices and culinary herbs, and microbial omega-3 oils, where such provisions are consistent with the General Standard for the Labelling of Prepackaged Foods (GSLPF) and established Codex precedent.

Kenya further notes the need for clarity, consistency, and practical enforceability in mandatory declarations, particularly that the “name of the product” should remain the principal labelling requirement in line with the GSLPF, while avoiding overly prescriptive mandatory use of trade names where common names may sufficiently identify the product. This approach promotes consumer understanding, legal certainty, and ease of implementation across diverse markets.

Nigeria

Nigeria supports the endorsement of the seven (7) labelling Provisions forwarded by CCFFV, CCASIA, CCNE and CCSCH to CCFL and listed in Appendix I as follow;

1. Draft standard for Fresh Curry leaves at step 5/8
2. Draft Regional standard for quick-frozen dumplings at step 8
3. Draft standard for Maamoul at step 8
4. Draft Regional standard for spices derived from dried or dehydrated fruits and berries- Requirements for vanilla at step 5/8
5. Draft standard for spices derived from dried or dehydrated fruits and berries- Requirements for large cardamom at step 5/8
6. Draft Standard for spices in the form of Dried seeds- Requirements for sweet marjoram at step 5
7. Draft Standard for herbs- Requirements for sweet marjoram at step 5

Rationale: The labelling Provisions as presented in these seven draft Standards are aligned with the General Standards for the labelling of prepackaged foods (CXS1-1985) and the General Standard for the labelling of Non- Retail Containers of food (CXS346-2021).

Nigeria supports the endorsement of the Labelling Provisions of the Draft Standard for Microbial Omega- 3 oils and the advancement of the standard for adoption at step 5

Rationale: The labelling Provisions of the standard for Microbial Omega- 3 oil is aligned with the relevant existing codex texts, including the mandatory declaration of the Eicosapentaenoic acid (EPA) and Docosahexaenoic (DHA). The mandatory inclusion of the name of the genus ensures authenticity of the product.

Rwanda

Comment

Rwanda agrees with the labelling provisions forwarded by the Codex Committee on Fresh Fruits and Vegetables (CCFFV) on the standard for fresh curry leaves

Rationale

The given labelling provisions will help in reducing fraud and mislabeling of products. These labelling provisions will also support traceability and food safety systems. Moreover, they are consistent with the updated template and layout for the Fresh Fruits and Vegetables standards.

Comment

Rwanda also agrees with the provisions forwarded by Codex Committee for Spices and Culinary Herbs (CCSCH) for standard for spices derived from dried or dehydrated fruits and berries - requirements for vanilla and for standard for spices in the form of dried fruits and berries - requirements for large cardamom; standard for spices in the form of dried seeds - requirements for coriander and standard for herbs - requirements for sweet marjoram.

Rationale

The given labelling provisions will help in reducing fraud and mislabeling of products. These labelling provisions will also support traceability and food safety systems. Moreover, they are consistent with the updated template and layout for the spices and culinary herbs standards.

Thailand

Draft regional standard for quick-frozen dumplings

Thailand supports the endorsement of the labeling provisions for the Draft Regional Standard for Quick-Frozen Dumplings, as proposed by the FAO/WHO Coordinating Committee for Asia (CCASIA).

Quick-frozen dumplings are widely consumed across the Asian region. Given that their compositions and fillings are highly diverse—often consisting of various combinations of optional ingredients—sometimes it may

not be practical to provide all of the main ingredients in the filling with the name of the product. In any cases, comprehensive the List of Ingredients will always declare all compositions of the product.

With this, Thailand would like to maintain the flexibility regarding the declaration of the filling name and retain the first sentence of Section 8.1 of the draft Regional Standard for Quick-frozen Dumplings as is.

Draft Standard for Microbial Omega-3 Oils

Thailand does not object the endorsement of the labelling provision of the Draft Standard For Microbial Omega-3 Oils by the Codex Committee on Fat and Oil.

However, we recommend moving the references (Guidelines on nutrition labelling; CXG 2-1985, General guidelines on claims; CXG 1-1979 and Guidelines for use of nutrition and health claims; CXG 23-1997) to be a new subsection under 7.3 Other Labelling Requirements to ensure that the format of the labelling provisions is consistent with the Codex Procedural Manual.

The proposed amendment is as follows:

7. LABELLING

The **products shall be labelled in accordance with** requirements of the General standard for the labelling of prepackaged foods (CXS 1-1985). Guidelines on nutrition labelling (CXG 2-1985), ~~General guidelines on claims (CXG 1-1979) and Guidelines for use of nutrition and health claims (CXG 23-1997) apply to this standard.~~ In addition, the following specific provisions apply.

7.1 Name of the food

The name of the microbial omega-3 oil shall conform to the descriptions provided in Section 2 of this Standard and at a minimum, shall include the name of the genus (Sections 2.1.1 to 2.1.3), e.g. Algal oil (*Schizochytrium* sp.).

7.2 Labelling on non-retail containers

The labelling of non-retail containers should be in accordance with the General standard for the labelling of non-retail containers of foods (CXS 346-2021).

7.3 Other labelling requirements

7.3.1 The declaration of EPA and DHA content, and other labelling requirements specified in the country of authorisation shall be provided.

7.3.2 The other labelling requirements related to nutrition and health claims shall be in accordance with the Guidelines on nutrition labelling (CXG 2-1985), General guidelines on claims (CXG 1-1979) and Guidelines for use of nutrition and health claims (CXG 23-1997).

United Republic of Tanzania

The United Republic of Tanzania (URT) supports the endorsement of labelling provisions forwarded by the relevant Codex committees, including CCFFV, CCASIA, CCNE, CCSCH and CCFO as well as commodity-specific standards covering fresh curry leaves, vanilla, large cardamom, coriander, sweet marjoram, and microbial omega-3 oils.

The United Republic of Tanzania (URT) notes that such provisions should remain fully aligned with the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), updated Codex templates, and established commodity-specific layouts, to ensure coherence, avoid duplication, and facilitate consistent interpretation and enforcement by competent authorities.

The United Republic of Tanzania (URT) considers these labelling provisions important for reducing fraud and mislabelling, strengthening traceability, and supporting food safety systems across domestic, regional, and international markets. In this regard, the United Republic of Tanzania supports maintaining clarity, proportionality, and practical relevance in origin-related declarations, including that Country of Harvest should, where included, remain optional rather than mandatory unless a clear commodity-specific justification is established.

This approach will enhance consumer confidence, fair practices in trade, and regulatory consistency across Codex standards.