

23 January 2024

CODEX COMMITTEE ON SPICES AND CULINARY HERBS

(Seventh Session)

Kochi, India, 29 January – 2 February 2024

European Union comments on

AGENDA ITEM 2

**Matters arising from the Codex Alimentarius Commission
and its Subsidiary Bodies**

(CX/SCH 24/7/2 Rev.1)

*Mixed Competence
Member States Vote*

The EU and its Member States (EUMS) thank the Secretariat for the information on matters arising from Codex Alimentarius Commission and its subsidiary bodies. The EUMS would like to submit the following remarks and considerations with regard to the matters arising from the Codex Alimentarius Commission and its subsidiary bodies.

Standard on Saffron (Para 19 ii. and para 23 b) of CX/SCH 24/7/2 Rev.1)

The EUMS consider that for saffron the indication of the country of harvest shall be mandatory for the following reasons:

- CCSC5 agreed to split country of origin and country of harvest into two independent and clear provisions for spices and culinary herbs standards and to reconsider provision of country of harvest (mandatory or optional) in individual standards should the need arise. Considering the particularities of the spices trade and supply chain of saffron and its unique quality characteristics, there is strong need for mandatory indication of country of harvest. The provision shall apply on the solid basis for the protection of product's safety, quality, authenticity and prevention of food fraud.
- Labelling provisions shall provide clear and reliable information to consumers regarding the quality of the products. The quality characteristics of saffron vary considerably depending on the country where it has been cultivated, even when same species or cultivars are used. Therefore, the country of harvest is an essential piece of information regarding the quality of the product.
- The country of origin for saffron shall be the place where it has been harvested since processing do not change the “nature” of the product. Processing such as, sorting, cleaning, drying, crushing, grading or/and packing are not capable to alter the quality of the end product, which is primarily attributed to the quality of the harvested product. The mandatory indication of both the country of harvest and of the country of origin ensures a consistent application of this rule. In addition, given that for other spices the

country for origin may be different from the country of harvest, naming the country of origin without providing the country of harvest could be confusing and misleading to consumers. These two terms are not contradictory and the indication of both terms shall be mandatory to ensure protection of the product identity and authenticity.

- In accordance with the General Standard for the Labelling of Prepackaged Food (GSLPF), the country of origin shall be declared if its omission could mislead or deceive the consumer. Due to the aforementioned particularities of saffron, the indication of the country of harvest should be mandatory.
- The mandatory indication of the country of harvest is a non-costly requirement, that can be effectively applied by food business operators (FBOs) who have to ensure the traceability of their products and therefore is considered an effective and dissuasive tool against food fraud and adulteration in the trade chain. Traceability, including the indication of the country of harvest, provides transparency along the food chain and, in turn, ensures the protection of the authenticity of the product, thus, contributing to fraud prevention. (Scientific literature^{1,2,3,4,5,6} shows that an increased number of fraud issues occurs for saffron, which includes misrepresentation, adulteration and substitution, since saffron faces a remarkably high demand and high production costs in the global market).

¹ Joint Research Centre (JRC) of the European Commission: Results of an EU wide coordinated control plan to establish the prevalence of fraudulent practices in the marketing of herbs and spices: https://food.ec.europa.eu/system/files/2021-11/food-fraud_action_herbs-spices_report_jrc126785_0.pdf

² S.A.Ordoudi et al. 2017. Uncovering a challenging case of adulterated commercial saffron: Food Control 81 (2017) 147-155

³ M.V.García-Rodríguez et al. 2017. Comparative evaluation of an ISO 3632 method and an HPLC-DAD method for safranal quantity determination in saffron: Food Chemistry 221 (2017) 838–843

⁴ E.A.Petrakis et al. 2017. Sudan dyes in adulterated saffron (*Crocus sativus* L.): Identification and quantification by 1H NMR: Food Chemistry 217 (2017) 418–424

⁵ A.Koocheki, E.Milani. 2020. Chapter 20 - Saffron adulteration. Saffron. Science, Technology and Health, Woodhead Publishing Series in Food Science, Technology and Nutrition 2020, Pages 321-334

⁶ J.Wakefield et al. 2019. Chemical profiling of saffron for authentication of origin: Food Control Volume 106, December 2019, 106699