

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 2.1, 3, 4, 5, 6, 7, 8, 8.1, 8.2

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

Ottawa, Canada

11-15 May 2026

### COMMENTS SUBMITTED BY EAST AFRICAN COMMUNITY (EAC)

#### **Agenda Item 2: Matters referred to by the Codex Alimentarius Commission and/or its subsidiary bodies**

The EAC takes note of the matters referred to by CAC47, CAC48, CCEXEC86, CCEXEC87 and CCEXEC89 and welcomes efforts to improve coherence and harmonization of Codex labelling provisions.

The EAC emphasizes that harmonized labelling strengthens consumer protection, supports fair trade practices, improves regulatory clarity, and reduces unnecessary technical barriers to trade, thereby facilitating both intra-regional and international trade.

Accordingly, the EAC supports continued work toward aligned, clear, and practical Codex standards.

#### **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**

The EAC supports a balanced and practical labelling approach in which “Country of Origin” remains mandatory, while “Country of Harvest” is declared on an optional and commodity-appropriate basis, including for spices such as saffron and mixed spice products.

The region recognizes that including Country of Harvest may, in certain cases, enhance transparency, strengthen traceability, support fraud prevention, and promote informed consumer choice, particularly for internationally traded spices of export significance. At the same time, the EAC notes the implementation challenges associated with mandatory harvest declarations, especially for blended or multi-stage processed products where cleaning, sorting, packaging, and sourcing from multiple countries may make a compulsory declaration impractical and potentially burdensome.

EAC supports further clarification by CCSCH on the distinction between Country of Origin and Country of Harvest, the specific circumstances under which Country of Harvest adds value, and the rationale for any commodity-specific mandatory requirements. The EAC also supports capacity-building initiatives, including workshops or side sessions, to promote a common understanding of Codex labelling texts and origin-related principles.

#### **Agenda Item 3: Matters of interest from FAO and WHO**

The EAC takes note of the matters of interest arising from FAO and WHO, particularly the Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens and the ongoing update of nutrient requirements for infants and young children from birth to 3 years of age. The region recognizes the critical importance of this scientific work in protecting consumer health, preventing allergen-related risks, and addressing malnutrition among infants and young children.

The EAC reaffirms that FAO/WHO scientific advice remains the foundation of Codex standard-setting and underscores the importance of targeted capacity-building and technical support for developing countries to facilitate effective uptake and implementation of such guidance, including ongoing work on nutrient profile models.

With respect to commodity-specific standards, the EAC 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.

The EAC further emphasizes 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.

#### **Agenda Item 4: Consideration of labelling provisions in draft Codex standards (endorsement)**

The EAC 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 EAC 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 EAC 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 EAC 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.

#### **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)**

The EAC welcomes the progress made by CCFL48 on both the revision of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and the Draft Guidelines on the Use of Precautionary Allergen Labelling (PAL). The EAC supports the advancement of the PAL guidelines to Step 8, recognizing their critical role in protecting consumers from allergen-related health risks through clear, prominent, and consistent labelling.

EAC notes that PAL should be grounded in a science-based and risk-proportionate approach, supported by internationally validated analytical methods, harmonized reporting units, and clear guidance on equivalent wording, gluten declarations, and allergen thresholds. EAC also underscores the importance of accessible, non-proprietary methods and practical implementation considerations to support effective enforcement, particularly in developing countries.

#### **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)**

The EAC supports the continued development of draft provisions on joint presentation and multipack formats under the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and agrees with their return to Step 2/3 for further refinement. The region recognizes that these packaging formats are increasingly used in domestic and international markets and therefore require clear, practical, and harmonized labelling rules.

The EAC emphasizes that the revised provisions should ensure that all mandatory information relevant to the product sold as a single unit, particularly where it differs from the individually packaged inner units, is clearly displayed on the outer packaging. This is essential to reduce consumer confusion, preserve the visibility of critical information such as allergens and nutrition declarations, and support effective enforcement by competent authorities.

The EAC further underscores that the provisions should remain proportionate and non-duplicative, particularly in situations where inner packages are not intended for individual sale, while ensuring consumers are provided with the necessary information to make informed purchasing decisions. Overall, the EAC supports continued technical work through the re-established EWG to achieve clear and implementable guidance.

#### **Agenda Item 7: Guidelines on application of food labelling provisions in emergencies**

The EAC supports the development and advancement of guidelines on the application of food labelling provisions in emergency situations, recognizing the need for a pragmatic and flexible framework that remains grounded in consumer protection. The EAC agrees that the draft appropriately strikes a high-level, principle-based, and non-prescriptive balance, allowing competent authorities to respond effectively to emergency conditions while maintaining essential safeguards.

The EAC emphasizes that any flexibility granted during emergencies should be carefully reviewed and authorized with due regard to public health risks, feasibility, and the realities of resource-constrained settings. Particular attention should be given to vulnerable population groups, including infants, young children, and

pregnant or breastfeeding women, whose nutritional and health needs may be especially sensitive to changes in ingredients, preparation instructions, or allergen declarations.

Accordingly, the EAC supports advancement of the text within the Codex Step Process as a practical tool to guide competent authorities in balancing emergency responsiveness, food safety, and the protection of nutritionally sensitive consumers.

#### **Agenda Item 8: Future work and emerging issues**

The EAC supports the prioritization of emerging food-labelling issues, particularly digital labelling, sustainability-related claims, and One Health considerations, as these areas reflect evolving global priorities, technological advancement, and the growing interlinkages between food systems, health, and environmental stewardship.

The EAC welcomes the future work in these areas and appreciates the contributions of members that have supported the development of the discussion paper. The EAC further emphasizes the importance of targeted capacity-building and technical support for developing countries to ensure meaningful participation in the standard-setting process and effective national implementation of any future guidance.

##### **Agenda Item 8.1 Proposal for new work on the application of food labelling provisions to alcoholic beverages**

The EAC supports the initiation of new work on the application of Codex labelling provisions to alcoholic beverages, recognizing that current Codex texts do not adequately address this product category. Harmonized guidance would improve consumer information, reduce inconsistencies across markets, and provide flexibility for national regulatory contexts.

The EAC endorses the establishment of an Electronic Working Group (EWG) chaired by Tanzania, with participation open to all interested Members and Observers, to prepare draft amendments and revisions to the General Standard and relevant guidelines for consideration by CCFL50. This approach ensures a structured, inclusive, and scientifically grounded process for developing practical labelling provisions for alcoholic beverages.

##### **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**

The EAC supports the development of a guiding definition for “small packages” and associated labelling exemptions. A clear, harmonized definition will promote consistency across Codex texts, facilitate compliance, and support enforcement, while ensuring that exemptions are applied in a transparent and proportionate manner that considers practical constraints without compromising essential consumer information.

EAC also supports the issuance of a Codex Circular Letter (CL) to invite proposals on new work or emerging issues, enabling CCFL to develop standards that respond to stakeholder needs and provide a common understanding of terminology used in food labelling.