

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 2, 2.1, 2.2, 3.1, 4.1, 5.1, 6.1, 7.1, 7.2, 7.3

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS
Eighth Session
COMMENTS OF UGANDA

Agenda Item 2: Matters arising from the Codex Alimentarius Commission and its subsidiary bodies
CX/SCH 25/8/2

Uganda takes note of the information provided in **CX/SCH 25/8/2** and appreciates the work done by the various subsidiary bodies.

Uganda is in support of the work carried out by Codex, as reflected in the submitted report. Uganda recognizes the progress made in the development and adoption of new standards, alignment of methods of analysis, provisions on food additives, and ongoing discussions on labelling and contaminants.

The Uganda further acknowledged Codex's important role in promoting food safety, fair trade, and consumer protection, and reaffirmed commitment to actively contribute to Codex processes while ensuring that Uganda's national interests and stakeholder voices are effectively represented.

Uganda's continued support for Codex work and its commitment to actively participate in discussions and contribute technical input to ensure that national interests and stakeholder perspectives are effectively represented.

Agenda Item 2.1: Information on the use of the term "Country of harvest" in the labelling of spices
CX/SCH 25/8/2 Add.1

Uganda expressed appreciation for the work being done by the Codex Committee on Spices and Culinary Herbs (CCSCH) Secretariat and acknowledged its continued efforts in coordinating the development of international standards for spices and culinary herbs. Uganda noted with gratitude the submitted report on Information on the use of the term "Country of Harvest" in the labelling of spices (CX/SCH 25/8/2 Add.1) and recognized its importance in guiding ongoing global discussions on labelling requirements.

Uganda re-echoes the position that while the "Country of Harvest" declaration promotes transparency and traceability, it should not be made mandatory as this could present challenges for producers and traders, particularly in low- and middle-income countries.

Uganda reaffirms its continued support for the work of the CCSCH Secretariat and Uganda's active participation in Codex processes.

Justification:

Uganda acknowledges the potential benefits of "country of harvest" (COH) labelling in promoting transparency and heritage. However, making it mandatory poses challenges, particularly for low- and middle-income countries where spices are mainly grown. These include limited capacity for verification, increased compliance costs, and inconsistencies with current Codex Standards, particularly CXS 1-1985, especially when spices are processed and transformed after harvest.

Uganda is also concerned that mandatory COH labelling could set a precedent for other food categories, increasing regulatory burdens. In cases of blended or transitioning spice sources, it may cause labelling complications. Therefore, Uganda recommends that COH labelling remain optional, at the discretion of the food business operator, as long as it does not mislead consumers.

Agenda Item 2.2: Information on activities of international organizations relevant to the work of CCSCH- CX/SCH 25/8/2 Add.2

Uganda appreciates and takes note of the work of the Codex Committee on Spices and Culinary Herbs (CCSCH) and acknowledges the valuable contribution of its Secretariat in advancing the development and harmonization of international standards for spices and culinary herbs.

Uganda notes with appreciation the information on activities of international organizations relevant to the work of CCSCH, recognizing the importance of such collaboration in supporting consistency, knowledge sharing, and global alignment in standard-setting.

Uganda continues to support the ongoing work of CCSCH and will actively participate from Uganda in future engagements to ensure that national interests and stakeholder perspectives are effectively represented

Agenda Item 3.1: Draft standard for spices in the form of dried fruits and berries - Requirements for vanilla CX/SCH 25/8/3

Uganda appreciates the work done by the chairperson and vice chairperson of the EWG for the work done in developing the standard.

Uganda deliberated on the draft standard for vanilla and generated the following comments:

1. Vanilla Product Classification Standards, Uganda recommends to maintain a distinction between vanilla caviar (pure vanilla seeds) and vanilla supreme (a commercially prepared paste with additives), while also deciding to separate ground and powdered vanilla into distinct categories. The discussion addressed the use of anti-caking agents (food additives) in powdered vanilla products, with the group implying their acceptance based on the need for free-flowing properties.

Thus, Uganda recommends defining six different vanilla styles, though specific details about moisture content and other requirements remained under discussion.

Justification

Uganda noted the vanilla caviar is made of pure vanilla seeds thus the need to separate it from the vanilla supreme which is commercially prepared paste and may include additives.

Thus, encouraging that the definition of the classes also changes accordingly.

2. Uganda recommends that the labelling requirements for trade names, species, and cultivars on product labels, made mandatory with members agreeing to maintain the "shall" requirement to ensure buyers can identify specific species.

Justification

It should be noted that maintaining the "shall" requirement ensures that buyers can identify specific species

3. Uganda recommends that the country of origin is made optional.

Justification

Uganda acknowledges the potential benefits of "country of harvest" (COH) labelling in promoting transparency and heritage. However, making it mandatory poses challenges, particularly for low- and middle-income countries where spices are mainly grown. These include limited capacity for verification, increased compliance costs, and inconsistencies with current Codex Standards, particularly CXS 1-1985, especially when spices are processed and transformed after harvest.

Uganda is also concerned that mandatory COH labelling could set a precedent for other food categories, increasing regulatory burdens. In cases of blended or transitioning spice sources, it may cause labelling complications. Therefore, Uganda recommends that COH labelling remain optional, at the discretion of the food business operator, as long as it does not mislead consumers.

4. Under table 1, Uganda is in agreement with option 3 of the table presentation.

Justification

- a) Option 3 combines the strengths of options 1 and 2 by covering all vanilla varieties and their unique characteristics, while also separating ground and powdered forms due to their different processing methods. Uganda also noted that option 3 provides a wider range for moisture content and vanillin levels, which could have implications for testing and compliance. The different options reflect the varying characteristics of vanilla from different countries, with Uganda falling into the vanilla pompona type.
5. Uganda recommends maintaining colour testing: sensory analysis (ISO 11037) and the Munsell colour chart using equipment

Justification

The rationale is that while sensory evaluation requires training and panellists, the equipment-based method was considered more objective. Uganda suggests that both methods could be important, especially for pesticide detection.

Agenda Item 4.1: Draft standard for spices in the form of dried barks - Requirements for cinnamon CX/SCH 25/8/5

Uganda commends the work of the EWG chairpersons and vice chairpersons.

Uganda deliberated on the agenda item and generated the following comments:

1. Uganda reviewed and discussed the two options for presenting cinnamon species in a draft standard, with Uganda agreeing to adopt option 2 which uses trading names for easier reference

Justification:

Uganda does not grow this spice, making it difficult to provide input on technical details, thus in agreement with what will be concluded on during the upcoming CCSCH 8 meeting

Agenda item 5.1: Draft standard for spices in the form of dried seeds - Requirements for coriander CX/SCH 25/8/6

Uganda commends the work done the chairpersons and vice chairpersons of the EWG.

Uganda discussed the definition and classification of coriander seeds versus fruits, ultimately deciding to use the term "seeds" based on market practice and industry usage. Uganda also reviewed chemical and physical characteristics for grading coriander, with explaining that chemical parameters apply to all grades while physical characteristics are more specific. Uganda agrees to maintain both groups and grades in their recommendations.

Agenda item 6.1: Draft standard for herbs - Requirements for sweet marjoram CX/SCH 25/8/7

Uganda commends the work done by the chair persons and the vice chair persons of the EWG.

Uganda recommends the addition of the word "sweet marjoram" to the scope in consistency with the new format for writing spice standards

Justification:

Uganda does not grow this spice, making it difficult to provide input on technical details, thus in agreement with what will be concluded on during the upcoming CCSCH 8 meeting.

Agenda item 7.1: New work and layout for SCH standards

i. Discussion paper on trade data availability for spices and culinary herbs

Uganda expresses appreciation for the work of the Codex Committee on Spices and Culinary Herbs (CCSCH) and reaffirmed her continued support for the Committee's efforts in developing and harmonizing international standards for spices and culinary herbs.

Uganda also appreciated the United States of America for preparing and submitting the Discussion Paper on Trade Data Availability for Spices and Culinary Herbs, noting its relevance in enhancing understanding of global trade flows and supporting evidence-based decision-making within CCSCH.

Agenda item 7.2: New work and layout for SCH standards

ii. Consideration of the proposals for new work (replies to CL 2024/40-SCH) CX/SCH 25/8/9

Uganda expresses appreciation for the work of the Codex Committee on Spices and Culinary Herbs (CCSCH) in relation to the Consideration of the Proposals for New Work (Replies to CL 2024/40-SCH) (CX/SCH 25/8/9). Uganda acknowledges the Committee's efforts in reviewing and advancing new work proposals aimed at strengthening international standards for spices and culinary herbs.

Uganda reaffirmed her continued support and commitment to actively participate in the ongoing and future work of CCSCH to ensure that Uganda's priorities and stakeholder interests are well represented in Codex standard development processes

Agenda item 7.3: New work and layout for SCH standards

iii. Update to the template for SCH standards CX/SCH 25/8/10

Uganda commends the work done by the proposers of the template for SCH Standards

Justification:

Uganda acknowledges the importance of this update in improving consistency, clarity, and alignment across existing and future SCH standards. Uganda reaffirmed her continued support for the work of CCSCH and Uganda's active participation in reviewing and applying the updated template to ensure that national perspectives and regional priorities are effectively considered in the development of international standards.