



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEx COMMITTEE ON SPICES AND CULINARY HERBS
Eighth Session
COMMENTS OF African Union (AU)

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)

African Union’s Position on the Proposed Mandatory Labelling of “Country of Harvest” for Spices

The African Union does not support the inclusion of the “country of harvest” as a mandatory labelling requirement in Codex standards for spices and other commodities. The proposed measure lacks sufficient technical, economic, or regulatory justification and may inadvertently introduce trade complexities that outweigh any potential benefits for consumer information, food safety, or fraud prevention.

Rationale

i. Existing Provisions Already Ensure Traceability

The “country of origin” labelling requirement already provides adequate transparency and traceability within global spice value chains. Introducing an additional “country of harvest” label would be duplicative, offering no measurable enhancement to consumer protection, risk management, or market integrity. Current Codex provisions and international trade frameworks already enable traceability through origin and supply chain documentation.

ii. Potential Trade and Economic Implications

Implementing a mandatory “country of harvest” label could create disproportionate administrative and compliance burdens, especially for smallholder producers and exporters in developing economies. Many spices are aggregated, processed, and packaged across multiple countries prior to export. Requiring harvest-specific identification would necessitate new verification and certification systems that could disrupt established supply chains, increase operational costs, and constrain participation in international markets.

iii. Risk of Introducing New Non-Tariff Barriers

Adopting “country of harvest” as a mandatory requirement may set a precedent for additional product-specific labelling obligations that function as non-tariff barriers rather than legitimate consumer protection measures. Such requirements could fragment trade systems, complicate conformity with WTO and Codex principles, and create unintended disparities between large exporters and small-scale producers.

iv. Limited Technical or Market Justification

No evidence demonstrates that including “country of harvest” materially improves food safety, quality assurance, or fraud prevention outcomes. The proposed measure does not enhance product integrity or address any identified risk pathway. Instead, it could reduce market efficiency and limit product competitiveness, particularly for bulk and multi-origin commodities that dominate international spice trade.

The African Union advocates for Codex standards that balance consumer protection with facilitation of fair and equitable trade. A mandatory “country of harvest” label does not meet this threshold and risks becoming a technical barrier inconsistent with Codex’s core objectives. African Union therefore recommends maintaining “country of origin” as the principal traceability element while encouraging voluntary approaches for any additional geographical information that may be relevant for specific single-origin products.

Accordingly, the African Union recommends that Codex should not adopt “country of harvest” as a mandatory labelling requirement for spices.

Agenda Item 5.1: Requirements for Coriander (Comments at Step 3) (CX/SCH 25/8/6 - CX/SCH 25/8/6 Add.1)

- **8.2.3 Region of harvest, year of harvest**

Position

The African Union does not support inclusion of “region of harvest” in the standard. The year of harvest however, should be included in the standard

Rationale

The *region of harvest* should not be included in the standard because it is not a reliable or scientific determinant of product quality or safety. Conditions within the same region can vary significantly, and factors such as cultivation methods, post-harvest handling, drying, and storage practices have a much greater impact on the chemical composition, microbiological safety, and authenticity of spices. By contrast, the *year of harvest* provides meaningful scientific information, as the age of the product directly affects freshness, stability of key compounds, flavor, and susceptibility to contamination such as mold or mycotoxins. Including the year of harvest therefore enhances traceability, supports risk assessment, and ensures consumers and regulators have accurate information on the safety and quality of the product.