



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON SPICES AND CULINARY HERBS**

**Eighth Session**

**DISCUSSION PAPER ON TRADE DATA AVAILABILITY FOR SPICES AND CULINARY HERBS**

(Comments of the European Union, Kenya)

**The European Union**

***Member States Competence***

***Member States Vote***

- (i) **Focus on group standard development. First, completing standards for SCH groups having the most commodities already standardized.**

As a principle, the Members States of the European Union (MSEU) favour the development of group standards, as opposed to drafting separate standards for single SCH. However, it is essential to ensure that, when necessary, the characteristics that are specific to one spice/culinary herb or a subgroup of spices/culinary herbs are appropriately addressed.

To make a responsible use of resources, the development of group standard should be considered for any new work proposals, while existing SCH standards should remain unchanged.

Enlarging the range of Harmonised System (HS) codes for CHS would enhance data quality and improve the availability of statistics.

Rationale:

The development of group standards simplifies Codex processes by involving multiple related commodities in one document. This is positive in terms of efficiency, given the scarce resources Codex has, as well as for consistency across similar SCH. Further, having group standards help the inclusion of emerging varieties.

However, attention must be given to the possible loss of specificity, as group standards may not capture the unique quality, safety, or compositional characteristics of certain commodities within the group. Thus, the fact of prioritising group standards cannot stop initiatives for the development of specific commodities.

- (ii) **When developing a group standard, there should be sufficient information available to complete both Annex I on Chemical and Physical Characteristics and Annex II Methods of Analysis and Sampling.**

The MSEU are of the view that ensuring the availability of high-quality information before engaging in the development of a standard is critical and should be a pre-requisite before considering work of a SCH, either as such or in the context of a group standard.

**Kenya**

**General Comments**

Kenya appreciates the initiative by the United States to prepare the discussion paper addressing the persistent challenge of limited trade data for spices and culinary herbs (SCH). The paper highlights a long-standing issue affecting the progressive development and prioritization of Codex standards for SCH.

Kenya recognizes that the Codex Procedural Manual's requirement for "volume of production and consumption in individual countries and volume and pattern of trade between countries" is difficult to fulfill for SCH due to the informal and fragmented nature of their production and trade. This challenge is particularly pronounced in developing countries, where production is dominated by smallholder farmers, informal intermediaries, and community-based trade networks with limited data capture and reporting mechanisms.

Kenya supports efforts to enhance data accessibility and flexibility in applying trade data requirements within the Codex standard-setting process, while maintaining transparency, scientific justification, and consistency with Codex principles. The approach should not disadvantage small-scale producers or developing countries that are key suppliers of SCH globally.

Kenya further supports exploring alternative data sources such as national agricultural surveys, market intelligence systems, customs reports, and trade associations, as well as the adoption of proxy indicators (e.g. export earnings, production acreage, and value-added estimates) in justifying new work proposals where detailed trade volume data are not available.

### **Specific Comments**

#### **1. Paras 5–7 (Lack of SCH Production and Trade Data and FAOSTAT limitations)**

**Comment:** Kenya agrees that the absence of disaggregated data in FAOSTAT and national statistics poses a challenge. Kenya proposes that Codex, through FAO and WHO, consider supporting Member Countries to develop standardized data collection templates or guidelines for SCH, aligned with existing agricultural statistical systems.

**Rationale:** Standardized data collection tools will promote harmonization and comparability of data across countries, facilitating evidence-based justifications for Codex new work proposals.

#### **2. Para 8 (Lack of individual Harmonized Tariff Codes)**

**Comment:** Kenya supports the observation that the limited number of HS codes constrains trade data collection for individual SCH. Kenya proposes that CCSCCH collaborate with the World Customs Organization (WCO) and the International Trade Centre (ITC) to explore the possibility of expanding or revising HS codes for key SCH of global economic importance.

**Rationale:** Enhanced HS code specificity will improve the traceability and availability of international trade data, facilitating Codex standard-setting and trade analysis.

#### **3. Paras 10–11 (Limitation of Codex data requirements)**

**Comment:** Kenya supports the proposal to review or interpret flexibly the Codex Procedural Manual's requirements on production and trade data for SCH. Kenya recommends that CCSCCH propose guidance to the Codex Committee on General Principles (CCGP) on how to adapt these requirements for commodities with limited formal trade data.

**Rationale:** Policy clarification or guidance from CCGP would ensure procedural consistency while enabling progress in SCH standard development despite data limitations.

#### **4. Para 12–13 (Physical characteristics of dried SCH)**

**Comment:** Kenya concurs that the low weight and high value of SCH necessitate economic value-based indicators rather than tonnage-based trade volumes in Codex justifications. Kenya proposes that CCSCCH consider value metrics and market trends as acceptable indicators of trade significance.

**Rationale:** The use of value-based indicators reflects the true economic and trade relevance of SCH and aligns with the realities of modern commerce.

#### **5. Recommendation (Para 15 (i)–(ii))**

**Comment:** Kenya supports prioritizing group standard development to efficiently cover a broader range of SCH where individual trade data are insufficient. Kenya further recommends that the selection of group standards be informed by both regional production and trade patterns and existing regional standards, such as those developed under the East African Community (EAC).

**Rationale:** Group standardization accelerates Codex work and ensures inclusion of regionally important SCH. Regional standards (e.g., EAS for spices) provide a solid technical and regulatory foundation for Codex work.

#### **6. Additional Proposal**

**Comment:** Kenya proposes that CCSCCH explore the use of regional and national case studies or industry-sourced data as interim evidence in project justifications for new work. Such data could be validated through expert consultations or FAO technical cooperation projects

**Rationale:** This approach ensures inclusivity and allows participation of developing countries in Codex work even where formal trade data are limited.