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# The Codex Alimentarius and Food Labelling: delivering consumer protection

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**Abstract:** The Codex General Standard for the Labelling of Prepackaged Foods and other Codex texts dealing with claims in general and health and nutrition claims in particular are described in a historical context. It is possible to demonstrate a transition from trade-based standards to consumer-based standards and guidelines – a process that is still underway. The main shift is from a strict ‘prevention of fraud’ scenario (1960s) to a scenario of providing consumer information (1990s) and, finally, to a scenario of delivering health policy through labelling.

**Key words:** Codex Alimentarius, food labelling, consumer protection, fraudulent claims, nutrition, health claims, ‘organic’ food, irradiated food, ‘Halal’ food, biotechnology, allergens, diet, non-communicable disease.

## 2.1 Introduction

The Codex General Standard for the Labelling of Pre-Packaged Foods was adopted in 1969: the first international standard to be approved by the newly-formed Codex Alimentarius Commission (CAC, 1969). The fact that the Standard bears the number “Codex-Stan 1” reflects its central importance as the principal Codex standard for consumer protection and for ensuring fair practices in the food trade. The General Standard was extensively revised and enlarged in 1985 and, since then, numerous amendments and additions have ensured that the Standard remains the key Codex instrument for delivering information about food to the

consumer.

The General Standard is accompanied by a range of specific texts. All Codex commodity standards provide specific interpretation of the General standard in reference to the 'Name of the Food', and two additional standards cover the labelling of foods for special dietary uses and of food additives when they are sold as such to the consumer and there are guidelines on nutrition labelling. Additional interpretation of the Standard is provided by guidelines covering the legitimacy of claims made on food labels: claims in general; health and nutrition claims; and claims concerning production and processing methods associated with 'organic' foods and 'Halal' foods.

Current debate about food labelling in Codex concerns the degree to which labelling should be used as an instrument of delivering public policy, in particular nutrition policies related to diet, physical activity and chronic diseases. The question of how to label GM foods remains unsolved.

This chapter will review the evolution of food labelling in Codex and the change in emphasis from trade-related standards to consumer-based standards and as an instrument in delivering public health policy.

### **2.2 The Codex framework for food labelling**

The Codex framework for food labelling consists of the General Standard, specific provisions in Codex commodity standards, a series of interpretative guidelines dealing with types of claims, and standards for the labelling of special dietary and special medical foods and for food additives sold as such. A specific standard deals with terms to be used for the labelling of dairy products (see Box 2.1).

The body responsible for the preparation of labelling texts is the Codex Committee on Food Labelling, hosted by the government of Canada since the inception of the Commission's work in this area. This Committee receives advice from other Codex Committees, most notably the Committee on Nutrition and Foods for Special Dietary Uses on matters relating to the technical and scientific basis of provisions concerning nutrition and health labelling, and the Codex Committee on Food Additives on issues relating to the names used for food additives.

The General Standard applies to all prepackaged foods offered to the consumer and for catering purposes. It is supplemented by individual Codex commodity standards that describe the nature and composition of foodstuffs and specify the name and/or names of the food reserved for use on products that conform to these standards. To a certain extent therefore, all Codex commodity standards are extensions of the General Standard and assist in its interpretation. Exemptions from, or additions to, the General Standard are allowed if they are necessary for interpretation in respect of the product concerned, including the provisions concerning date-marking (CAC, 2008b). In 2002, the combination of the General Standard and the specific Codex Standard for Sardines and Sardine-like Products

### **Box 2.1 Codex texts on food labelling**

General Standard for the Labelling of Prepackaged Foods (Codex Stan 1-1985)

General Standard for the Labelling of Food Additives when Sold as Such (Codex Stan 107-1981)

General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (Codex Stan 146-1985)

Codex Standard for the Labelling of and Claims for Foods for Special Medical Purposes (Codex Stan 180-1991)

General Standard for the Use of Dairy Terms (Codex Stan 206-1999)

General Guidelines on Claims (CAC/GL 1-1979)

Guidelines for Nutrition Labelling (CAC/GL 2-1985)

Guidelines for the Use of Health and Nutrition Claims (CAC/GL 23-1997)

General Guidelines for the Use of the Term 'Halal' (CAC/GL 24-1997)

Guidelines for the Production, Processing, Marketing and Labelling of Organically Produced Foods (CAC/GL 32-1999)

(Codex Stan 94-1981, Rev.1-1995) was used by the World Trade Organization for the resolution of a dispute under the provisions of the Agreement on Technical Barriers to Trade (WTO, 2002).

The Committee on Food Labelling reviews and endorses the labelling provisions of all draft standards submitted to the Commission for adoption to ensure consistency with the General Standard. In recent years, there has been a trend towards full harmonization of requirements with those of the General Standard and a reduction in the number of exemptions or special requirements.

## **2.3 Specific food labelling issues in the Codex general standard**

### **2.3.1 The principles of food labelling**

The first substantive section of the General Standard contains the 'Principles of Food Labelling' (Box 2.2). These principles have not been modified since the original 1969 standard. They strongly reflect that particular part of the mandate of the Codex Alimentarius Commission aimed at 'ensuring fair practices in the food trade' but do not address the other main objective of the Commission, namely protecting the health of consumers. There have been amendments to the General Standard with this latter objective in mind, in particular in relation to the labelling of potential allergens, and current trends, particularly the use of labelling for the promotion of public nutrition policies, are more closely linked to this objective.

It may also be questioned whether the Codex principles are sufficient to meet the legitimate need of consumers 'to have access to adequate information to enable them to make informed choices according to individual wishes and need' as set out in the United Nations Guidelines on Consumer Protection (United Nations, 1985).

### **Box 2.2 The principles of food labelling**

Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect; Prepackaged food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.

Various actions taken by the Commission have extended the informational aspect of food labelling, in particular in date-marking and in nutrition labelling, with a view to enabling consumers to make informed choices.

#### **2.3.2 Ingredient labelling**

The labelling of food ingredients, especially food additives, has been a feature of the Codex General Standard since its inception, and this is the most detailed section of the Standard. Such labelling has consumer information as its primary objective as it is a general principle that any substance added to food as an additive must have been evaluated and approved for safety in use. However, should a consumer wish to avoid any particular additive, this section of the standard allows such a choice to be made. Ingredient labelling has been the subject of multiple amendments since the adoption of the original standard; all tending towards greater transparency in the information provided to the consumer in particular in the declaration of sub-ingredients in combined foods or mixtures of foods and in the quantitative labelling of certain ingredients (CCFL, 2008a). There are specific requirements for the declaration of potential allergens (see below).

#### **2.3.3 Date-marking**

Detailed date-marking provisions were included in the General Standard at the time of its revision in 1985. Prior to this revision, date-marking was considered on a case-by-case basis by Codex commodity committees on the basis of Guidelines developed by the Committee on Food Labelling and adopted by the Commission in 1978 (revised in 1981). The Codex General Standard introduced the use of the expression 'Best before' to describe the date of minimum durability (the preferred form of date-marking), and this expression is now widely used in national regulation. Although not in conflict with the Principles of Food Labelling, the provision of information about expected quality by means of date-marking extends the amount of information provided to the consumer through food labelling.

There remains some confusion as to the purpose of date-marking, in particular in reference to food safety, and unfortunately the General Standard is not explicit

on this. On the other hand, the Guidelines to Codex Committees were quite explicit and stated that: “The purpose of date marking is to give the consumer a date which will provide information about the expected quality of the product provided that it has been properly stored. This does not mean that date marking guarantees either the acceptability or the safety of the product” (CCFL, 1980). Date-marking should be accompanied by appropriate storage instructions taking into account the nature of the product.

### **2.3.4 Irradiated food**

The General Standard contains a brief, but detailed, section on the labelling of irradiated food. This is unusual as firstly, such requirements would normally have been included in the corresponding commodity standard, in this case the General Standard for Irradiated Foods (Codex Stan 106-1983, Rev.1-2003); and secondly, because this is the only processing and production method singled out for special labelling. The historical reasons for this special treatment in part have to do with the consideration of the use of food irradiation as having the same characteristics as the use of food additives (technical discussions were in fact handled by the Codex Committee on Food Additives) and in part because of the heightened interest of consumers in this matter. The inclusion of provisions relating to specific processing and production methods has also been considered for the labelling of foods obtained through certain techniques of genetic modification/genetic engineering but without agreement on this matter<sup>1</sup> (see below).

## **2.4 Claims and other interpretative guidelines**

Following the adoption of the General Standard in 1985, there was considerable debate in the Committee on Food Labelling as to the nature of claims that might be made legitimately within the context of the second of the Principles of Food Labelling. Among those claims that caused concern were exaggerated health and nutrition claims, claims that a normal diet could not provide adequate nutrition, and claims concerning the use of specific terms such as ‘natural’ or ‘organic’ (CCFL, 1972). The debate led to the adoption of the General Guidelines on Claims to serve as an amplification of the second statement of principles (CCFL, 1979). The Guidelines were subsequently revised in 1991.

The General Guideline on Claims deals with prohibited claims, potentially misleading claims and conditional claims (i.e., claims subject to specific conditions).

Specific texts have since been adopted by the Commission to provide further detailed interpretation in the case of foods marketed as ‘organically-produced’ and foods claimed to be ‘Halal’. Claims made in relation to special dietary foods and medical foods are covered by separate standards (see Box 2.1).

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<sup>1</sup>At 1 January 2009.

The Committee considered, but then abandoned, draft guidelines on the use the term ‘natural’ (CCFL, 1994) and ‘vegetarian’ (CCFL, 2000). As of 2009, the Committee has not undertaken work on social or environmental claims (other than ‘organic’) nor on claims related to geographic identification.

## 2.5 Nutrition labelling: health and nutrition claims

The Commission has adopted two major texts in this area: Guidelines for Nutrition Labelling and Guidelines for Use of Health and Nutrition Claims (see Box 2.2). Both texts originated from discussions about how nutrition and health information should be conveyed to the consumer.

The current Guidelines on Nutrition Labelling were adopted in 1985 and have been amended several times; most recently in 2006. They describe the form and content of nutrition information on a food label. This information can be applied voluntarily, but must be applied when either a nutrition claim or a health claim is made. The Guidelines for the Use of Health and Nutrition Claims were adopted in two phases: the first dealing with nutrition claims only (1997) and the second dealing with both health and nutrition claims (2004). Both sets of guidelines were developed with the technical and scientific advice of the Codex Committee on Nutrition and Foods for Special Dietary Uses.

Although both of these guidelines contain provisions that expand and interpret the General Standard, they add very substantially to the Principles of Food Labelling which address almost exclusively the prevention of fraud or deceptive practices.

The Guidelines on Nutrition Labelling introduced the concept of consumer information ‘so that a wise choice ... can be made’, and linked nutrition labelling to public health policy (see Box 2.3). The preamble to the Guidelines for Use of

### **Box 2.3 Purpose of the guidelines on nutrition labelling**

To ensure that nutrition labelling is effective:

in providing the consumer with information about a food so that a wise choice of food can be made;

in providing a means for conveying information of the nutrient content of a food on the label;

in encouraging the use of sound nutrition principles in the formulation of foods which would benefit public health;

in providing the opportunity to include supplementary nutrition information on the label.

To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner.

To ensure that no nutritional claims are made without nutrition labelling.

Nutrition and Health Claims also linked labelling to the implementation of national policies to the point that ‘only nutrition claims that support national nutrition policy should be allowed’ and that health claims should be consistent with, and support, national health policies, where applicable (CAC, 2008a). These changes should be seen as a shift of emphasis from ‘ensuring fair practices in the food trade’ to a more balanced approach that also encompasses ‘protecting the health of consumers’. Both objectives are equally stressed in the Statutes of the Codex Alimentarius Commission. The provision of information (almost as an end in itself) is consistent with the general principles contained in the UN Guidelines for Consumer Protection that call for ‘access of consumers to adequate information to enable them to make informed choices according to individual wishes and needs’ (United Nations, 1985).

The Guidelines on Nutrition Labelling provide for the declaration of energy value; protein, carbohydrate and fat content; and the amount of any other nutrient for which a nutrition or health claim is made. There are specific provisions for the declaration of claims relating to types of fatty acids and cholesterol; types of carbohydrates and fibre; and for vitamins and minerals. The Guidelines also specify the way in which nutrient content should be presented on the label, including a list of reference or daily intake values for certain nutrients.<sup>2</sup>

The Guidelines for Use of Health and Nutrition Claims allow nutrition and nutrient claims as well as comparative nutrient claims, under specified conditions and in conformity with standardized wording for such claims. Health claims must be substantiated scientifically and must consist of information on the physiological role of the nutrient(s) or on an accepted diet–health relationship, and relevant information on the composition of the food unless the diet–health relationship is based on the whole food or cannot be linked to specific constituents of the food. Claims may be made that relate to established dietary guidelines or to ‘health diets’. A table of conditions as to what constitutes ‘Low’, ‘Very low’, ‘Free’ and ‘Source’ is included in the Guidelines. An annex on the scientific substantiation of health claims was submitted to the Commission for adoption in 2009 (CCNFSDU, 2008).

### **2.5.1 Diet, physical activity and health**

In May 2004, the WHO’s World Health Assembly endorsed a global strategy to combat the increasing world-wide incidence in non-communicable diseases, in particular cardio-vascular disease, type 2 diabetes and certain types of cancer linked to unhealthy diets and physical inactivity. The strategy was developed from the report of an FAO/WHO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases (FAO/WHO, 2003). The global strategy envisages further development in certain areas for which the Codex Alimentarius Commission

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<sup>2</sup>At the time of writing, the Codex Committee on Nutrition and Foods for Special Dietary Uses was considering the development of general principles for establishing nutrient reference values of vitamins and minerals for the general population (CCNFSDU, 2008).

is competent including: labelling to allow consumers to be better informed about the benefits and content of foods; measures to minimize the impact of marketing on unhealthy dietary patterns; fuller information about healthy consumption patterns, including steps to increase the consumption of fruit and vegetables; and production and processing standards regarding the nutritional quality and safety of products (WHO, 2004).

Both the Codex Committee on Food Labelling and the Codex Committee on Nutrition and Foods for Special Dietary Uses have begun work in response to the global strategy. At the time of writing,<sup>3</sup> the Committee on Food Labelling is discussing a revision of the Guidelines on Nutrition Labelling including:

- the list of nutrients that are always declared on a voluntary or mandatory basis and discussion of issues related to mandatory nutrition labelling;
- the legibility and readability of nutrition labelling and labelling provisions dealing with the food ingredients identified in the global strategy; and
- the revision of the Nutrient Reference Values contained in the Guidelines (CCFL, 2008b).

The Committee on Nutrition and Foods for Special Dietary Uses has decided to undertake new work on the development of Nutrient Reference Values associated with increased or decreased risk of non-communicable diseases (CCNFSDU, 2008).

The final response to the WHO Global Strategy, in the form of new or revised Codex standards or guidelines, is certain to take several years of scientific enquiry and intense negotiation within the relevant Codex committees. Nevertheless, the principle that these standards and guidelines should reflect public health and consumer protection policies has already been established. The work continues.

## **2.6 Labelling, food safety and allergens**

It is universally acknowledged that foods offered for sale to consumers should be safe to eat, at least when prepared and/or cooked according to usual household practices. In fact, people have the right to expect the food they eat to be safe and suitable for consumption (CAC, 2003). It is not surprising, therefore, that all Codex food labelling assumes that all foods to which labelling might apply are safe to eat. Of course, foods can deteriorate and become unsuitable for human consumption, and labelling plays a significant role in limiting the effects of deterioration by providing suitable storage and handling instructions. The Codex Principles and Guidelines for the Conduct of Microbiological Risk Management (CAC/GL 63-2007) suggest that proper labelling includes information that instructs the consumer regarding safe handling practices and, where appropriate, briefly informs the consumer of the food safety issue.

For some sections of the population the problem is not microbiological risk but

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<sup>3</sup>February 2008.



allergies and intolerances to certain foods or food ingredients that cause discomfort, illness, or even death. A detailed examination of food labelling and allergies is provided elsewhere in this book (Chapter 5). The Codex General Standard for the Labelling of Prepackaged Foods requires that certain known allergens<sup>4</sup> always be included in the list of ingredients even if they are present as sub-ingredients of composite foods below the cut-off level of 5 per cent. The presence of any of these allergens occurring as a result of transfer through genetic modification must also be declared.

## 2.7 Foods derived from biotechnology

The Codex Alimentarius Commission first discussed the implications of modern biotechnology for its food standards work in 1989 (CAC, 1989), and the matter was first taken up by the Committee on Food Labelling in 1994. Discussions within the Committee have been difficult and, at the time of writing, no texts relating to the labelling of foods derived from biotechnology ('genetically modified' or 'genetically engineered' foods) have been adopted by the Commission, with the exception of an amendment to the General Standard concerning the transfer of known food allergens into a modified food. A more complete description of the issues surrounding the labelling of foods derived from biotechnology is given in Chapter 9 of this book.

## 2.8 Codex, labelling and advertising

The question of advertising and its relationship to labelling has been the subject of debate within the Codex Alimentarius Commission and its Committee on Food Labelling over many years. A chronology of this debate, up to and including the Commission session in 2003, was prepared by the Canadian Secretariat to the Committee (CCFL, 2004). Since then, the Commission has included a reference to advertising in the Guideline for Use of Nutrition and Health Claims "where required by the authorities having jurisdiction" and a minor amendment in the form of a definition for advertising in the same Guideline (CAC, 2008).

In 1984 a legal opinion was provided by the Legal Counsels of FAO and WHO (cited in CCFL, 2004) that contains the following basis for the consideration of advertising by the Commission:

'Advertising' is not specifically referred to in the Statutes of the Codex Alimentarius Commission, whose mandate is the implementation of a program designed to protect the health of consumers and to ensure fair practices in the food trade. However, to carry out such a mandate, the Commission is implicitly authorized to deal with matters which are

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<sup>4</sup>Cereals containing gluten; crustacean, eggs, fish, peanuts, soybeans, milk, tree nuts and the products of any of these; and sulphite in concentrations of 10 mg/kg or more.

necessarily incidental and ancillary to the very substance of such mandate. 'Advertising' has always been considered, both generally and by the parent organizations of the Commission, as a matter having aspects which are necessarily incidental and ancillary to the protection of the health of the consumers and the ensurance of fair practices of (food) trade. The Commission may therefore consider the aspects of advertising which are directly linked to the achievement of its purpose. It may also delegate its competence relating to advertising to a subsidiary body, in accordance with its Statutes.

Despite this legal authority, the Commission has been most reluctant to enter into in-depth discussions on advertising and there are very few references to advertising in Codex standards and guidelines. These include:

- A statement to the effect that nothing in the labelling and advertising of foods for special dietary uses foods shall imply that advice from a qualified person is not needed (Codex Stan 146-1985, Section 3.2).
- A statement that the advertising of foods for special medical purposes to the general public should be prohibited (Codex Stan 180-1991, Section 3).
- A claim made in advertising that a food is 'organic' is sufficient to trigger the Guidelines for the Production, Processing, Marketing and Labelling of Organically Produced Foods (CAC/GL 32-1999, Section 1.2).
- References to the International Code of Marketing of Breast-milk Substitutes (1981) and the Global Strategy for Infant and Young Child Feeding and World Health Assembly resolution WHA54.2 (2001) in the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (Codex Stan 72-1981 Rev.1-2007, Section 1.4), and the Standard for Processed Cereal-Based Foods for Infants and Young Children Codex (Stan 074-1981, Rev. 1-2006, Section 1). The International Code includes 'advertising' within the definition of 'marketing'.
- Reference to advertising in the Guideline for Use of Nutrition and Health Claims as cited above.

One reason for the reluctance of the Commission to enter into the field of advertising may be that in many countries advertising is regulated under legislation pertaining to general consumer protection and trade practices for goods in general rather than under food law. It may be that the question is not one of legal competence in the matter, but of technical competence and a division of responsibilities at the national level being reflected in the Commission's debates.

## 2.9 Conclusions

The Codex General Standard for the Labelling of Prepackaged Foods was conceived as the key Codex text for consumer protection within the sense of protecting the consumer against fraud, deception and economic disadvantage; in other words 'ensuring fair practices in the food trade'. For certain foods, those for which the

Commission has elaborated commodity standards, the General Standard is supplemented by specific labelling provisions, including the *Name of the Food* and, in these cases, the General Standard and the commodity standard must be read together. The WTO has affirmed importance of these labelling provisions in the case of EC-Sardines (WTO, 2002). An extension of this concept has led to the development of guidelines in prevent the misuse of certain claims: health and nutrition claims, claims that a food is ‘organic’ or ‘Halal’.

From the original concept of the General Standard as primarily a trading standard, the Commission has adopted a series of amendments, revisions and additional interpretative texts that add to the information content of labelling, especially in date-marking and nutrition labelling. Thus the idea of a standard preventing fraud and deception gradually became expanded to include requirements aimed at allowing consumers to make informed choices when purchasing food.

The Commission and its Committee on Food Labelling are now grappling with the question of including measures that implement public policy on diet, physical activity and health, some aspects of which clearly fall within the Commission’s established technical competence and some of which require further expansion of this competence. The history of food labelling in Codex suggests that the Commission will take positive but cautious steps to meet this challenge.

## 2.10 References

[Note: CAC stands for Codex Alimentarius Commission; CCFL stands for Codex Committee on Food Labelling; ALINORM is an symbol for documents within Codex]

- CAC (1969). Report of the Sixth Session of the Joint FAO/WHO Codex Alimentarius Commission, ALINORM 69/67. Rome: FAO/WHO, para 127–129.
- CAC (1989). Report of the Eighteenth Session of the Joint FAO/WHO Codex Alimentarius Commission (ALINORM 89/40). Rome: FAO/WHO.
- CAC (2003). Recommended International Code of Practice – General Principles of Food Hygiene CAC/RCP 1-1969, Rev. 4-2003. Rome: FAO/WHO.
- CAC (2008a). Guidelines for Use of Health and Nutrition Claims (CAC/GL 23-1997). Rome: FAO/WHO.
- CAC (2008b). Relations between Commodity Committees and General Committees: Food Labelling. Procedural Manual of the Codex Alimentarius Commission. Rome: FAO/WHO, 104–105.
- CCFL (1972). Report of the Seventh Session of the Codex Committee on Food Labelling, ALINORM 72/22. Rome: FAO/WHO.
- CCFL (1979). Report of the Thirteenth Session of the Codex Committee on Food Labelling, ALINORM 79/22. Rome: FAO/WHO.
- CCFL (1980). Report of the Fifteenth Session of the Codex Committee on Food Labelling, ALINORM 81/22, Appendix IV. Rome: FAO/WHO.
- CCFL (1994). Report of the Twenty-Third Session of the Codex Committee on Food Labelling, ALINORM 95/22. Rome: FAO/WHO.
- CCFL (2000). Report of the Twenty-Eighth Session of the Codex Committee on Food Labelling, ALINORM 01/22. Rome: FAO/WHO.
- CCFL (2004). Discussion Paper on Advertising (CL 2004/54-FL). Rome: FAO/WHO.
- CCFL (2008a). Report of the Thirty-Sixth Session of the Codex Committee on Food Labelling (ALINORM 09/31/22). Rome: FAO/WHO.

## 16 Innovations in food labelling

- CCFL (2008b). Report of the Thirty-Sixth Session of the Codex Committee on Food Labelling, ALINORM 08/31/22, Appendix IV. Rome: FAO/WHO.
- CCNFSDUL (2008). Report of the 30th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses, ALINORM 09/32/26. Rome: FAO/WHO.
- FAO/WHO (2003). *Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases* (WHO technical report series; 916). Geneva: WHO.
- UNITED NATIONS (1985). Consumer Protection. General Assembly Resolution A/RES/39/248 of 16 April 1985. Geneva: UN Department of International and Social Affairs. Available at: <http://www.un.org/documents/ga/res/39/a39r248.htm> [accessed July 2009].
- WHO (2004). Global Strategy on Diet, Physical Activity and Health – Resolution WHA57.17. Geneva: World Health Organization. Available at: <http://www.who.int/dietphysicalactivity/goals/en/index.html> [accessed July 2009].
- WTO (2002). European Communities – Trade Description of Sardines. Geneva: World Trade Organization.