



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD LABELLING
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DISCUSSION PAPER ON CONSIDERATION OF ISSUES REGARDING FRONT-OF-PACK NUTRITION LABELLING

(Prepared by Electronic Working Group Chaired by Costa Rica and Co-chaired by New Zealand)¹

1. INTRODUCTION

The last few years has seen a significant increase in the provision of simplified nutrition information on food labels for the purposes of improved consumer understanding to support healthier food choices. This is in an environment where food labelling, including simplified nutrition labelling, has been identified as an important tool to help reduce the increasing incidence of obesity and chronic non-communicable diseases that is being faced worldwide.

At the 43rd Session of the Codex Committee on Food Labelling (CCFL43), Costa Rica and New Zealand presented a conference room document (CRD 20), which identified the lack of global consistency and guidance on simplified nutrition labelling (e.g. front-of-pack labelling) as an issue that Codex may need to consider.

It was noted that the proliferation of different front-of-pack nutritional labelling systems could create problems for export and trade and that some global consistency in approach should be sought through the Committee on Food Labelling (CCFL).

It was also noted that the World Health Organization (WHO) is currently developing guidance for countries considering front-of-pack labelling systems and it was important that there was coherence in the work of WHO and Codex.

It is not the intention of this work to establish a specific global scheme of front-of-pack nutrition labelling.

2. BACKGROUND

At CCFL43, the Committee agreed to initiate discussions on front-of-pack nutrition labelling (FOPL) through an electronic working group (eWG) chaired by Costa Rica and co-chaired by New Zealand, working in Spanish and English with the following terms of reference:

- i. Take stock of the current front-of-pack nutrition labelling systems existing in different countries;
- ii. Consider the need for development of global principles to underpin front-of-pack nutrition labelling;
- iii. Prepare a discussion paper, taking into account the WHO work on this matter² and a draft project document for consideration at the next session of the Committee.

As part of this work, the current provisions of the *Guidelines on Nutrition Labelling* (CAC/GL 2-1985) were reviewed to determine whether they allow or provide adequate guidance on front-of-pack nutrition labelling, to governments, industry or other agencies, with the objective of international harmonization and reduction of trade barriers.

An invitation to join the eWG was issued in June 2016. A total of 45 member countries and 15 observer organizations responded to the invitation to join the eWG. The report of the eWG will be considered by CCFL44, which will decide on the way forward (REP16/FL, para.70).

¹ Full [List of Participants \(Appendix V\)](#)

² At the time of circulation of this report, the document on WHO's work in this matter was not yet available so it will be considered in the next stage.

3. WORK OF THE eWG

A first discussion paper was circulated in August 2016 with an eight-week consultation period. A total of 45 responses were received from 37 member countries and 8 observer organizations.

The first discussion paper consisted of 11 questions, covering the following:

- Collection of information on all Front-Of-Pack Nutrition Labelling (FOPL) systems either currently being used or under development in different countries. This information was compiled into a global stocktake document of FOPL systems ([Appendix III](#)).
- Whether the *Guidelines on Nutrition Labelling CAC/GL 2-1985* currently include provisions for FOPL.
- Whether the *Guidelines on Nutrition Labelling CAC/GL 2-1985* provide adequate guidance to assist Governments and industry wanting to implement FOPL.

The second discussion paper was circulated in March 2017 with a six-week consultation period. A total of 30 responses were received from 24 member countries and 6 observer organizations.

The second discussion paper covered the following:

- Presentation of the information collected on all FOPL systems, whether they are currently being used or under development in different countries and confirm it was captured correctly.
- Clarification of the criteria used by the eWG for determining the inclusion and exclusion of FOPL systems in the stocktake document.
- Analysis of responses to first discussion paper.
- Proposed next steps for the electronic working group.

The discussion paper and the project document are presented in Appendices I and II respectively. Member countries and observer organizations having an interest on this matter are kindly invited to consider the conclusions and recommendations of the discussion paper based on the summary provided in the discussion papers. The draft project document (Appendix II) will be discussed at the CCFL44 to determine the specific work that should be included and the revised as necessary.

DISCUSSION PAPER ON FRONT-OF-PACK LABELING

The following is a summary of the issues identified in the first and second discussion papers and is based on responses from members of the eWG.

3.1. Definition of Front of Pack Nutrition Labelling (FOPL)

The analysis of the responses from the first discussion paper raised the question of what is considered to be front-of-pack nutritional labelling (FOPL), which is defined in different ways in different parts of the world and in various publications. Therefore, it is important that what is considered a FOPL for the purposes of this work is clearly described.

In the first discussion paper the words “Simplified nutrition information (particularly on front of pack)” were used. However, it was considered that this may not be adequate and that some inclusion and exclusion criteria were needed to support the work of the eWG.

The systems considered as FOPL for the purposes of the eWG to date included any system that would present simplified nutritional information, particularly on front of pack, with the intention of increasing the consumer's understanding of the overall nutritional value of the food, to assist in interpreting the nutrient declaration.

In the table below, these criteria are presented with the amendments recommended by the eWG members.

Table 1. Inclusion and exclusion criteria for the definition of FOPL systems

Inclusion Criteria	Exclusion Criteria
<ul style="list-style-type: none"> ▪ Symbols/graphic or textual indications that provide simplified nutrition information used on the front or principal display panel of “prepackaged foods” (as defined by the <i>General Standard for Labelling of Prepackaged Foods</i> (CODEX STAN 1-1985)); i.e. for retail sale to consumers ▪ Symbols/graphic or textual indications that provide information on the overall nutritional value of the food, or on nutrients of public health importance. 	<ul style="list-style-type: none"> ▪ Isolated symbols/graphic or textual indications assigned to a food based on presence, absence, reduction or fortification of a food group, single nutrient or ingredient. For example, “dairy free”, “high in calcium”, “contains wholegrain”, “gluten free”, etc. ▪ Symbols/graphic or textual indications which are not used on the food package. For example, shelf tags. ▪ Symbols/graphic or textual indications which are used only on packs not intended for retail sale to the consumer. For example, systems only used on foodservice packaging.

These inclusion and exclusion criteria are based on the systems themselves and not on the developer of the system. Therefore, systems developed by governments, industry and other organizations that meet the above criteria were considered FOPL for this work.

In response to the second discussion paper most members agreed that these criteria reflect what is considered a FOPL, however, several members pointed out that information that can be found near the food should be considered as part of this work, for example, on shelf-tags; and that this approach is consistent with the labelling definition contained in the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985). This was because both systems that are on the packaging or are displayed near the packaging provide health and nutrition information to the consumers at the point of sale. Therefore, consistency in how the criteria are established, the delivery of information to the consumer and guidance on how they should be implemented was considered to be important.

Several members indicated that food prepackaged for food service should also be included within what is considered to bear FOPL.

What should be included and excluded from the definition of FOPL for this work will be an important issue for the CCFL to consider.

3.2. Stocktake of FOPL Systems

In the first discussion paper, the eWG members were asked to provide details of all implemented or proposed (voluntary or mandatory) FOPL systems existing in their country, whether currently used or under development. The information collected was confirmed by the members during the second discussion paper and the corresponding changes were made.

A total of 41 responses were received (37 member countries and four observer organizations). It was identified that 20 countries have at least, one system implemented, eight countries have at least one system proposed, three countries have systems implemented and proposed, and six countries indicated that they do not have any systems defined.

From the responses received from the member countries, 16 different implemented FOPL systems were identified (six informative systems, 10 interpretive systems)³ in 23 countries. (See table 2).


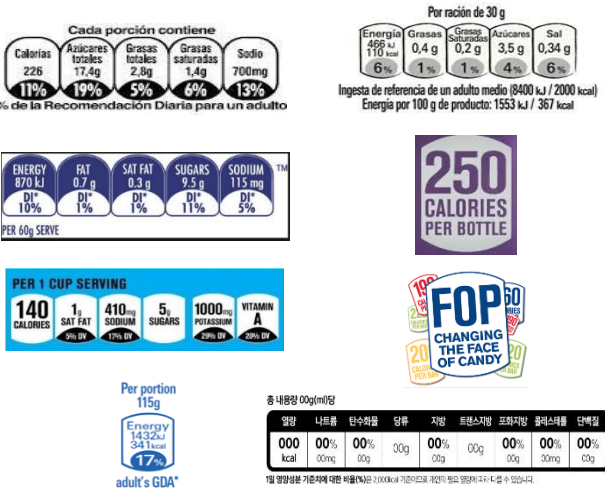

From the implemented systems, 17 countries have them as voluntary, four are mandatory, and two countries have them as voluntary and mandatory. There are three mixed systems (interpretive/informative), five interpretive systems and eight informative ones.

Moreover, 10 proposed systems in 11 countries were identified –10 are countries with a voluntary proposal, and one country with a mandatory proposal. These included two mixed systems (interpretive/informative), four interpretive systems (symbols) and one informative system. Three systems have not been defined yet.

It is important to note that three observer organizations identified FOPL systems that are being used or are proposed by countries that are not part of this working group. This information has not been verified by the countries in which the systems are operating. However, for the purposes of this work, it is considered as valuable information and therefore included. It is requested that the relevant countries check this information and verify at the CCFL that the information is both correct and complete.

The following information was provided: Seven are implemented systems (five interpretive, two mixed) and three are proposed systems –not defined yet.

Table 2. Systems Implemented in Total

Interpretive	Informative (or Non-Interpretive)
Identified by Member Countries	
	
Others Identified by Observer Organizations	
	<p>Not applicable</p>

From the 23 implemented systems in total (provided by both countries and organizations), 11 are developed and implemented by governments (implemented in 11 countries), seven by industry (implemented in 14 countries). Eight systems were developed in combination by industry, government, academics, and research organizations or non-governmental organizations.

³ **Interpretive system:** Includes symbols, colour codes and graphic representations that facilitate interpretation by the consumer.

Informative (or non-interpretive system): It only involves the transfer of some of all of the information considered relevant from the nutrient declaration, without any interpretation.

It should be noted that systems can be implemented in several countries.

Moreover, from the 14 proposed systems in total (provided by both countries and organizations), seven are initiated by the government (proposed in seven countries), three by the industry (proposed in seven countries). Two systems were developed in combination by the industry, government, academy, and research organizations or non-governmental. Two systems are not defined yet.

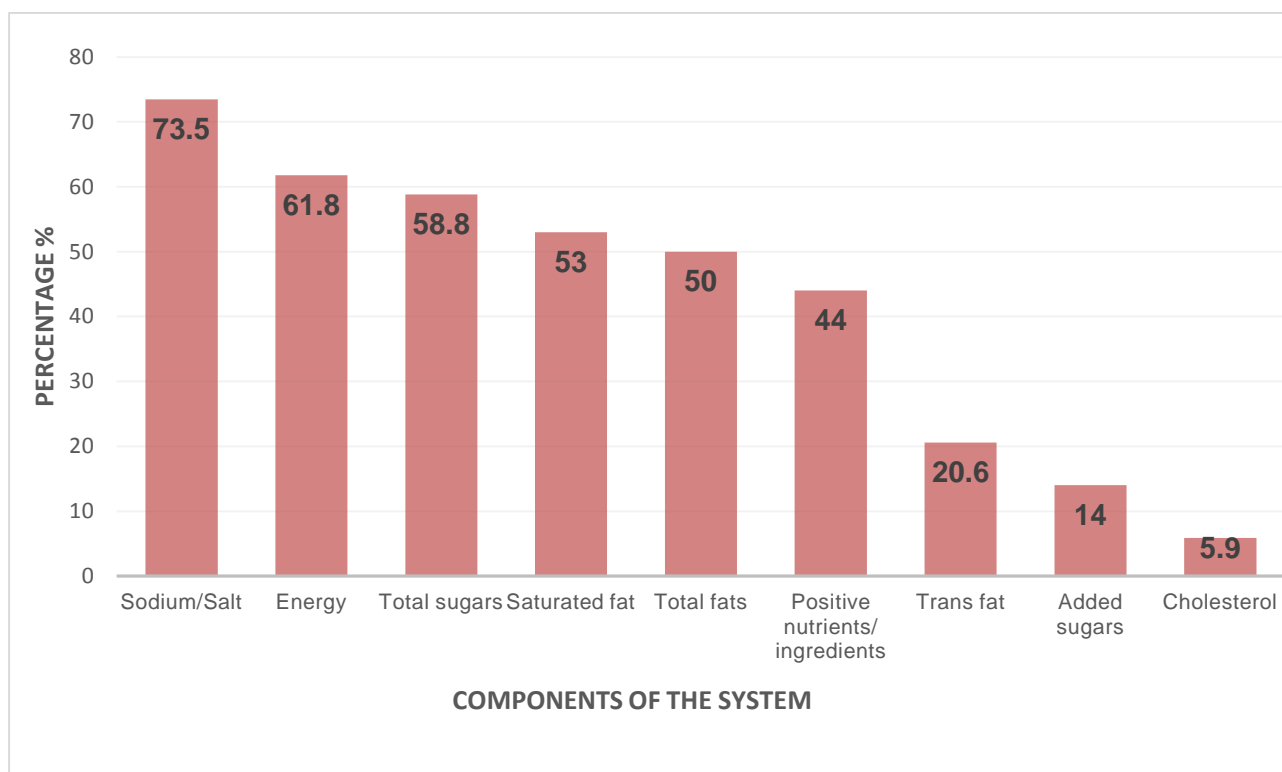
3.3. Criteria used to define the front-of-pack labelling systems (FOPL)

Members were consulted about the criteria used to define the different FOPL systems outlined in the stocktake. Thirty-six replies were received (32 member countries and four observer organizations).

The criteria used to define the systems are mostly in line with the World Health Organization (WHO) recommendations for nutrients related to chronic non-communicable diseases (NCDs) of public health importance and nutritional profiles. The criteria for some systems weight the amounts of energy, fats, sugars and sodium, with fibre, vitamins, minerals and other ingredients according to the food category. The eWG members provided references to the specific criteria for the different systems ([Appendix III](#)).

The nutrients and ingredients that were used most frequently in the 34 total systems are identified below:

Graph N°1. Most commonly used nutrients and ingredients from the systems identified



44% of the systems considered positive nutrients or ingredients such as fibre, proteins, vitamins, and vegetables.

3.4. Research Available

The eWG members were asked if they had any research or studies related to the development of the identified system, if so they were asked to provide the information.

22 member countries and three observer organizations provided reference information, and this is listed in [Appendix IV](#).

3.5. Monitoring and evaluation of FOPL systems

In order to consider the impact of the implementation of the FOPL systems on public health and consumer understanding, the members were asked if any monitoring or evaluation of the use of the identified system was carried out or planned and if so, that they provide information on this. 36 responses were received (32 countries and four observer organizations).

According to the responses received, monitoring of the implemented systems is being performed in 15 countries. Six countries do not undertake any monitoring, and two countries indicate that they are in a research

stage. In 11 countries, the government is performing a monitoring process. In one country, the monitoring is by the industry, in three countries the monitoring is by the government and the industry.

In general, the three aspects that are most commonly evaluated are the following:

- Implementation or uptake by the industry.
- Compliance with the existing regulations.
- Understanding/perception by the consumer.

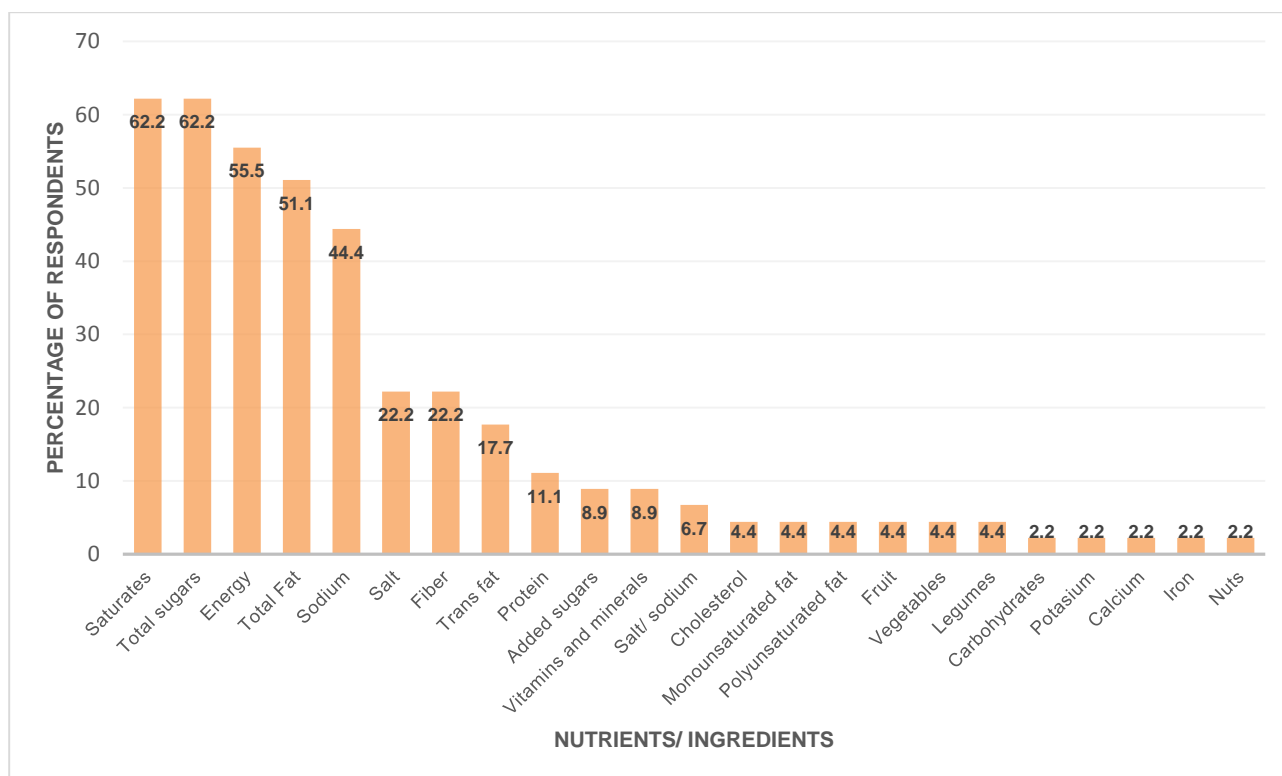
Additionally, six industry groups are monitoring the use of interpretive and non-interpretive systems by their organizations members.

At the time of data collection, there was no documentation provided of any evaluation of the efficacy of the systems mentioned at the public health level.

3.6. Information considered as a priority in the FOPL

EWg members were asked which nutrient information they consider should be a priority for FOPL and the following information was obtained from 43 participants (36 member countries and 7 observer organizations):

Graph N°2. Nutrients / ingredients considered a priority in a FOPL system



Regarding the following nutrients: total fat, saturated fat, sugars and sodium, and energy, the participants considered the following reasons to justify their inclusion in a FOPL system:

- They are related to diseases such as overweight, obesity, diabetes, heart diseases, cancer, tooth decay, high-blood pressure.
- The reduction of these nutrients improves the diet (according to the recommended daily intake parameters)
- They help consumers make informed decisions
- Public health issues in general

Twelve respondents considered that including “positive” nutrients or ingredients in the system was necessary for the following reasons:

- Increase the food intake
- Encourage the industry to implement FOP

- Promote reformulations

3.7. Existing guidance on FOPL in the Codex Guidelines

Members were asked for their opinion on whether the *Guidelines on Nutrition Labeling* (CAC/GL 2-1985) are an appropriate guide to assist countries / organizations wishing to establish their own nutrition labelling system on FOPL or whether further information would be useful. 42 responses were received to these questions (34 countries and eight member organizations), three countries did not answer.

From the total of answers, 31 (23 countries and eight organizations) indicated that the *Guidelines on Nutrition Labelling* did not provide adequate guidance to help countries/organizations that want to establish their own FOPL, eight member countries considered that the *Guidelines on Nutrition Labelling* did provide adequate guidance. Six member countries did not indicate whether the guidelines provided adequate guidance or not.

Additionally, 34 respondents (26 member countries and eight observer organizations) indicated that more information would be useful or that the information currently available was limited or not enough, and that more guidance would be beneficial for international harmonization.

3.8. Sections of the *Guidelines on Nutrition Labelling* that should be modified

Two questions addressed the issue of which text/paragraph or section of the *Guidelines for Nutrition Labelling* should be amended to include guidance on FOPL. The comments of the members of the eWG are summarized below.

37 responses were received to these questions (29 member countries and eight observer organizations).

65% of the member countries that responded to these questions indicated that some sections should be modified. 35% did not indicate any specific section.

100% of the observer organizations indicated that one or more sections should be modified.

The sections of the *Guidelines on Nutrition Labelling* where the eWG felt further the guidance on FOPL was needed are indicated below:

Table N°3. Section of the *Guidelines for Nutrition Labelling*, which should be modified to cover or include a guideline on FOPL according to the participants of the eWG

Section #	Number of countries	Number of organizations	Total
2	9	2	11
3	5	2	7
4	7	3	10
5	19	8	27
New section	4	-	4
Not indicated	13	-	13

3.9. Barriers or Limitations of FOPL

With regard to the current technical barriers or limitations as a consequence of the inclusion of FOPL on prepackaged foods, 43 replies were received (34 member countries and eight observer organizations).

The barriers or limitations as a result of the inclusion of FOPL that were mentioned by respondents are summarized below:

- Lack of harmonized guidelines,
- Different serving sizes and reference values for the different systems,
- The different systems consider different nutrients,
- Difficulty to compare products,
- The limited space on the label hinders the implementation of the FOPL,
- Different nutritional parameters and profiles, as well as different calculation bases,
- The multiplicity of systems in the same label could confuse consumers,
- Some nutrients and not the food as a whole are taken into account. This could make consumers believe that only these ones impact health,
- In some cases, the FOPL is not applied to all food categories. This could create some trade barriers,

- Lack of resources to educate the population,
- Inconsistencies between the nutrition information table and the FOPL,
- Lack of a harmonized definition regarding the FOPL,
- Confusion on the consumer for not reading the information of the nutrition table –only reading the FOPL,
- The FOPL could make a distinction between good or bad foods instead of good or bad diets,
- Lack of scientific consensus,
- Different nutritional needs between different populations,
- High implementation costs for the industry.

3.10. Importance of inclusion of FOPL

From all the 45 participants (37 member countries and eight observer organizations), 37 indicated that including FOPL on prepackaged foods was important. Two indicated that FOPL was not important, five participants did not define a position, and one did not answer.

The main reasons why including the FOPL was considered important were:

- It is a quick way to inform the consumer about the content of nutrients that could be related to the occurrence of non-communicable diseases or to nutrients that benefit health.
- It guides the selection consumers make regarding food.
- It is a way for clearly displaying relevant information.
- It encourages food producers to innovate and reformulate healthier foods.

4. CONCLUSIONS

Based on the stocktake of FOPL systems used worldwide, significant variation in the systems could be noticed. However, there were several common elements described by members that could support the development of general scientific principles to guide countries and organizations wishing to establish such systems, with the intention of providing simplified nutrition information to consumers to enable them to identify healthier food choices, while avoiding creating unnecessary obstacles to the food trade.

It is also recognized that a FOPL system, in order to effectively fulfill the objective for which it was created, must necessarily be complemented by a process of education, awareness and communication to the consumer, highlighting the importance of a balanced and nutritious diet; because the information contained in a label does not necessarily ensure a change in the decision on food consumption, nor is it a guarantee of the reduction of chronic non-communicable diseases.

5. RECOMMENDATIONS

Given the above analysis and conclusions, the eWG recommends that the CCFL agree to initiate new work to develop general guidelines that provide clear and transparent scientific guidance to governments, industry or other agencies wishing to implement nutrition labelling on the front of packaging and submit the attached Project Document (Appendix II) for approval by the Codex Alimentarius Commission to initiate the proposed new work.

In addition, it is recommended that the CCFL discuss the following issues:

- a. Whether a definition of FOPL for the purposes of this work be agreed, including what is and what is not considered to be FOPL.
- b. Options for providing future guidance on FOPL.

APPENDIX II

DRAFT PROJECT DOCUMENT

DEVELOPMENT OF GUIDANCE ON USE OF SIMPLIFIED NUTRITION INFORMATION ON THE FRONT OF PACK

(REVISION OF THE *GUIDELINES ON NUTRITION LABELLING (CAC/GL 2-1985)*)**1. PURPOSE AND SCOPE OF THE NEW WORK**

The scope and purpose of the work is to develop a guidance on the use of simplified nutrition information on the front of pack. The work would seek to review the current Codex provisions under the [*Guidelines on Nutrition Labelling (CAC/GL 2-1985)*] to ensure it provides for the use of simplified nutrition labelling on the front of pack and the development of additional guidance to support its use, taking into account the WHO work on guiding principles for the application of front-of-pack labelling systems for the promotion of healthy diets.

2. RELEVANCE AND TIMELINESS

This proposal relates to development of guidance to assist governments (or other stakeholders) in the development and implementation of simplified nutrition information (particularly on front of pack) which has been identified as a significant opportunity in a number of countries.

According to the stocktake undertaken by the eWG, there is an increasing number of Codex members where front of pack nutrition labelling systems is currently in use or being proposed for use.

The *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* allow for the use of front of pack nutrition labelling, however they do not provide the necessary guidance to ensure front of pack labelling is applied in a way that ensures potential barriers to trade are minimized.

3. MAIN ASPECTS TO BE COVERED

The *Guidelines for Nutrition Labeling (CAC / GL 2-1985)* in Section 5 allow for the use of supplementary nutrition information; however, further clarification is required and the present project document seeks to establish additional guidance which may include general principles for development and implementation of front of pack nutrition labeling systems.

The proposal is to develop specific guidelines that may or may not be included within the *Guidelines for Nutrition Labeling (CAC / GL 2-1985)*. A decision on whether these guidelines should be placed within the *Guidelines for Nutrition Labeling (CAC / GL 2-1985)* or in a separate document will be made after they have been developed.

It is proposed that the guidance covers at least the following aspects:

- i. General principles
- ii. Purpose and Scope
- iii. Definition of FOPL
- iv. Development and implementation of the FOPL system (Steps to follow)
- v. Governance of the FOPL system
- vi. Monitoring and evaluation

4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES**General criterion**

Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.

Simplified nutrition information may have a role to play in facilitating greater understanding of the nutrition content of foods by consumers. This may also help guide consumers to healthier choices. Simplified nutrition information, particularly on front of pack, may also encourage food manufacturers to reformulate their food products to gain a more positive nutrient profile, thus improving the nutritional quality of the food supply available to consumers. Improved nutrition via either a healthier food supply or consciously made healthier choices would improve the risk profile for a number of non-communicable diseases globally.

Criteria applicable to general subjects

(a) *Diversification of national legislations and apparent resultant or potential impediments to international trade*

A number of countries have adopted or are planning simplified nutrition labelling systems either on a voluntary or mandatory basis. It is important that with a growing number of systems globally some consistency is

maintained at a global level to ensure that impediments to trade that may arise from different approaches are minimised.

(b) *Scope of work and establishment of priorities between the various sections of the work.*

Conduct a revision of Codex texts including the *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* is undertaken in order to formulate recommendations and guidance on the use of front of pack nutrition labelling.

(c) *Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies)*

In November 2015 WHO held a technical meeting on Nutrition Labelling for Promoting Healthy Diets. The objectives of this meeting included reviewing the types of FOPL being implemented at that time, reviewing the evidence for effectiveness of different types of FOPL and reviewing case studies of countries with experience in implementing FOPL.

Subsequently, WHO initiated work on the development of Guiding Principles on FOPL which will be taken into account as soon as they are available to complement the work being done in the CCFL.

(d) *Amenability of the subject of the proposal to standardization*

Many countries are looking to Codex for clear and unambiguous guidance on areas such as nutrition labelling. The purpose of the new work proposal is the review and clarification of existing text to ensure it provides for the use of simplified nutrition labelling on the front of pack and the development of additional guidance to support its use, either in the current guidelines or in an independent document.

(e) *Consideration of the global magnitude of the problem or issue*

Simplified front of pack nutrition information is a topic of interest in a number of countries around the World. Voluntary and mandatory systems are in place in a number of countries and at a global level this is a topic of discussion at the WHO. It has also been raised at WTO where inconsistency in labelling requirements has the potential to be a barrier to trade. Promotion healthier diets for consumers and encouraging manufacturers to improve the healthiness of the food supply are areas where strong guidance could have a significant impact globally.

5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES

The proposed work is in line with the Commission's mandate for the development of international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The new work proposal will contribute to advancing Strategic Goals 1 and 3 as described below.

Strategic Goal 1: Establish international food standards that address current and emerging food issues

The use of simplified nutrition labelling on the front of pack is of increasing interest and activity in a number of countries globally. Currently there is no global guidance on best practice with regard to this form of labelling. Therefore, there is a risk that a proliferation of systems may result in confusion and barriers to trade.

Providing guidance for countries looking to implement front of pack nutrition labelling and principles that should be considered when implementing such a system would help ensure a degree of global harmonisation.

Strategic Goal 3: Facilitate the effective participation of all Codex members

Bringing this topic to CCFL will enable all members who have an interest in simplified nutrition labelling to participate in discussions.

6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS

The proposal is to review the *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* and these guidelines are applicable horizontally across all prepackaged foods.

7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE

None identified at this stage. There will be opportunity to consult with relevant bodies if necessary throughout the process.

8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES

WHO work on guiding principles for front-of-pack nutrition labelling systems for promoting healthy diets will be considered in the development of guidance for Codex.

9. PROPOSED TIMELINE:

If approved by the Commission in 2018, the work is expected to take the Committee at least two sessions to complete.