

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 12

CX/NFSDU 18/40/13-Add.1

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Fortieth Session

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DISCUSSION PAPER ON GENERAL GUIDELINES TO ESTABLISH NUTRITIONAL PROFILES

Comments of Iran and Kenya

IRAN

We support the development of science-based regulations to protect the health of consumers and facilitate trade. However, we feel that the proposed new work on 'GENERAL GUIDELINES TO ESTABLISH NUTRITIONAL PROFILES' is premature due to the fact that the aim is to develop these guidelines for use in front-of-pack nutrition labelling (FOPNL) systems, but the work on FOPNL was just validated by the Codex Alimentarius Commission of this year and will have to be further developed to know if this work on Nutrient Profile remains relevant, and how to align with FOPNL discussions and decisions (as an example, which nutrients/ ingredients would need to be considered). We propose this new work to be postponed waiting for results of the CCFL discussion on FOPNL. Then a stepwise approach is suggested once first decisions are taken in CCFL to avoid a huge delay and try to go as much in parallel as possible based on the speed of the discussion for FOPNL. In addition, this scientific work should be requested to be developed by the Joint FAO/WHO Expert Meetings on Nutrition (JEMNU) to ensure it will be based on solid scientific evidences.

We want to highlight that the most important issue for FOPNL scheme will be harmonization, especially in the context of existing national regulations, with mandatory FOPNL, based on different nutrition criteria and different visuals.. Depending on the criteria / Nutrient Profile beyond the FOPNL, schemes could be either very strict or not. To develop Guidelines to establish nutrient profiles for FOPNL will be very useful but might not avoid national divergences.

The only way to address the need for harmonization by decreasing the inconsistencies in labelling requirements which have the potential to be a barrier to trade, would be for Codex to develop global principles to support the FOPNL which would result in one single system for worldwide application. **And this should be based on a nutrient profile to be developed by JEMNU to support the FOPNL scheme to be proposed by Codex Committee**

è We don't support this work at this stage but would propose to postpone this work until further clarification of the CCFL work on FOPNL and then, when clarified, to open a new work for CCNFSDU, and for CCNFSDU to ask JEMNU to develop corresponding nutrient profile criteria.

Proposed Questionnaire:

This questionnaire will have to be revised and adapted when the work on FOPNL will be clarified and this work on nutrient profile validated: Some additional questions may be relevant according to the FOPNL discussions and decisions.

Waiting for that, some additional points should already be included :

- Question 4:

- o On which scientific basis was it developed?
- o What is the scope of this nutrient profile
- o Ingredients should be added in the question : What critical nutrients does it include

- Question 5 :
 - o Are the criteria defined by categories or across the board
 - o If by categories, how are these categories defined
 - o On which reference are they defined (per 100g/ml, per portion, other ?)
 - o What about the strictness of the criteria : How was it defined and validated?
 - o On which basis were the nutrient thresholds defined?
 - § Based on the food supply
 - § Based on food composition table
- Question 7 : if yes, how was it validated and by whom

KENYA

Kenya comments Costa Rica and Paraguay for developing this discussion paper.

Specific comments:

Clause 3: *Main aspect to be covered*

We strongly believe this work will go a long way in informing consumers to make informed decision during purchase. The importance of the 'front of the pack' nutrition labelling cannot be over emphasized. So it is important that at this stage the committee makes decision in the project paper on if this will be incorporated in CXG 2 or not rather than waiting for the work to be completed for such decision to be made.

Clause 5: *Relevance to Codex Strategic Objectives*

- Codex SP presents the objectives as goals rather than objectives thus they should read as, "**Strategic goal**"
- Strategic goal 2 in the Codex SP is not related to what is indicated in the project document. Instead it should read "Strategic goal **3**"