

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

AGENDA ITEM NO. 7 (B)

CX/FL 03/08

E

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-FIRST SESSION
OTTAWA, CANADA, 28 APRIL - 2 MAY 2003**

**PROPOSED DRAFT GUIDELINES FOR THE LABELLING OF FOODS AND
FOOD INGREDIENTS OBTAINED THROUGH CERTAIN TECHNIQUES OF
GENETIC MODIFICATION/GENETIC ENGINEERING:
LABELLING PROVISIONS
(ALINORM 03/22 – APPENDIX IV)**

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

**BRAZIL
SOUTH AFRICA
CONSUMERS INTERNATIONAL (CI)**

PROPOSED DRAFT GUIDELINES FOR THE LABELLING OF FOODS AND FOOD INGREDIENTS OBTAINED THROUGH CERTAIN TECHNIQUES OF GENETIC MODIFICATION/GENETIC ENGINEERING: LABELLING PROVISIONS (ALINORM 03/22 – APPENDIX IV)

GOVERNMENT COMMENTS AT STEP 3

BRAZIL:

Title: to keep the title of the document.

1.0. Scope

Footnote # 6 - Gene Technology: to exclude the square brackets, keeping the definition in the document.

3.0. Labelling provisions

3.3. We suggest to delete the square brackets and to keep the text in the document. To delete “should” and to maintain “shall” without the square brackets.

Item 3.5. We suggest correcting the number of the footnote from 6 to 11. To delete the square brackets and to keep the text.

4.0. Threshold Levels

To put the whole item between square brackets.

5.0. Exemptions

To keep the text between square brackets.

6.0. Label Declarations

6.2. To delete from the text the expression “intended”.

We suggest to include after the expression “examples of label declarations”, the following sentence: “**which may be adopted in accordance to the national legislation**”, with the following proposed draft:

(...) Where food and food ingredients obtained through certain techniques of genetic modification/genetic engineering are labelled to declare the method of production, examples of label declaration(s), “**which may be adopted in accordance to national legislation**”, include but are not limited to: (...)

Justification: The Brazilian proposal is based on the item 4.2.3.3 of the “Codex General Standard for the Labeling of Prepackaged Foods”, CODEX STAN 1-1985 (Rev. 1-1991)

We propose to keep all the examples on the list.

Item 6.2 (Repeated numbering): to renumber to 6.3.

7.0. Implementation

To keep the text between square brackets.

SOUTH AFRICA:

Foods obtained from genetically modified organisms that have been legally assessed for safety and risk concerns should be labelled as considered as for the conventional counterparts. Therefore, Codex deliberations regarding labelling should only address the requirements defined in paragraph 3.1 with respect to differences. The agricultural practices and food production practices have adequately addressed differences by means of statistical analysis, therefore the description “differ significantly” is sufficient.

Cognisance is taken of consumers need for choice, but the purpose of Codex Alimentarius is to give guidance with respect to firstly safety based on sound science and secondly to facilitate trade.

CONSUMERS INTERNATIONAL (CI):

Consumers International (CI) appreciates the opportunity to comment on the latest proposed Draft of the Guidelines on Labelling of Foods Obtained by GE/GM.

The latest draft proposed recommendations are basically sound as written, with some of the minor changes CI proposes below, and should be advanced in the step process.

Detailed comments:

Section 1.0 SCOPE

CI supports the new layout of this section into three sub-sections, which makes clear that there are various labelling options that CODEX member countries can use. CI supports the full mandatory labelling option as spelled out in 1.1.3.

Section 3.0 LABELING PROVISIONS

Section 3.3. We support deletion of square brackets around this entire section, since this is an important health protection matter. We also feel that the proper language for the end of the sentence is "shall" rather than "should," to make this section parallel to the wording in Section 3.2.

Section 3.5. We support removing the square brackets around the entire section as we feel that cultural and religious considerations are of importance to many consumers in the world.

Section 4.0. THRESHOLD LEVELS

We support deletion of the entire section on Thresholds. If there are any detectable residues of protein or DNA resulting from genetic engineering/genetic modification, the product should be labelled.

Section 5.0. EXEMPTIONS

We urge this section be deleted, since it undermines comprehensive labelling. However if it is retained, we particularly object to the inclusion of "highly processed food ingredients" in the list of examples. Highly processed ingredients often constitute virtually the entire contents of a food product--for example the corn in corn flakes. Exemption of highly processed ingredients could turn a labelling program into a meaningless effort, and one which was highly misleading to consumers.

If the intent of this section is to allow for exemptions of items which are present in extremely small quantities in processed food, then this should be made clear and would make this section more acceptable. In that case, delete "highly processed food ingredients" in the second line and insert the phrase "that are present in extremely small quantities" after the words "food and food ingredients" in line 3.

Section 6.0 LABEL DECLARATIONS

Section 6.2. All the alternative wordings for labels which are suggested here that include the term genetically engineered or genetically modified will provide adequate information to the consumer. Thus, the square brackets should be removed from alternatives (a), (b), (d), (e), (g) and (h). However alternatives (c), (f) and (i)--which refer to products of biotechnology or gene technology--are unacceptably vague and indefinite and should not be recommended by Codex.

Section 7.0. IMPLEMENTATION

We support removing the square brackets from this entire section because, in our view, it offers guidance which may be helpful. We also believe that the words "to facilitate product tracing/traceability" should be added to the second sentence (addition in bold) so that it reads, "These include, but are not limited to: development of validated detection methods, establishment of verification (for example, documentation) systems **to facilitate product tracing/traceability**; and efforts for the development of supporting capacity and infrastructure." This addition should be made to make this document more consistent with the documents (particularly the Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology) forwarded to Step 8 at the 3rd meeting of the Ad Hoc Task Force on Foods Derived from Modern Biotechnology.