

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 4,5,6

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CODEx COMMITTEE ON FOOD LABELLING

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(Comments from the Philippines)

AGENDA ITEM 4 ORGANIC AQUACULTURE (PROPOSED DRAFT OF THE *GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS*), CL 2014/30-FL, REP15/FL APPENDIX III

Proposed Draft (At Step 3)	Comments
Section 2.2 Definitions	
<p>Aquaculture means the farming of aquatic organisms involving intervention in the rearing process to enhance production and the individual or corporate ownership of the stock being cultivated</p>	<p>Country Position: The Philippines supports definition of Aquaculture as proposed in the draft.</p> <p>Rationale: Consistent with its previous position, the Philippines agrees with the definition as lifted from the FAO technical guideline on Aquaculture Certification 2010. The proposed definition covers and looks into the whole value chain and the relevant processes involved in aquaculture production.</p> <p>Likewise, in the interest of harmonization of standards, the Philippines reiterates its belief that it is appropriate to consider and use existing international texts to come up with uniform and harmonized definitions</p>
<p>Aquatic organisms include finfish, shellfish (crustaceans and molluscs), aquatic plants and algae, but exclude mammals, reptiles, birds and amphibians.</p>	<p>Country Position: The Philippines supports the definition of Aquatic organisms as proposed in the proposed draft.</p> <p>Rationale: Inclusion of a definition on aquatic organisms provides a collective understanding and also provides a definite scope of the animals, plants and algae covered by the standard.</p>
<p>Clean water means water from any source where harmful microbiological contamination, substances and/or toxic plankton are not present in such quantities that may affect the safety of fish, shellfish aquatic organisms and their products intended for human consumption</p>	<p>Country Position: The Philippines supports the definition of Clean Water .</p> <p>Rationale: The proposed definition of Clean Water has been lifted from an already existing Codex text (CAC Recommended Code of Practice for Fish and Fishery Products) and thus consistent with the principle of harmonization of standards (including definitions).</p> <p>Consequently, the deletion of the terms fish, shellfish</p>

	and its replacement as aquatic organisms provides overall harmonization of the terms in the draft standard.
Section 6. Inspection and Certification Systems	
6.8 <u>Organic operator has to present an organic management plan to a certification body for verification during inspection. The plan must be updated annually</u>	<p>Country Position</p> <p>The Philippines supports for the inclusion of Paragraph 6.8 in the proposed draft.</p> <p>Rationale:</p> <p>Maintenance of an organic management plan is a critical requirement in the verification of compliance of organic production units. The plan serves as guide for producers in ensuring that the provisions set in the organic guidelines are being followed and implemented in each of their production unit.</p>
ANNEX 1 Principles of Organic Production	
A2. <u>AQUATIC PLANTS, ALGAE AND THEIR PRODUCTS</u>	<p>Country Position:</p> <p>The Philippines supports the inclusion of the term <u>AQUATIC PLANTS</u> in the proposed draft</p> <p>Rationale:</p> <p>The proposal takes into account the harmonious use of terminologies in the proposed draft, particularly, in the definition of Aquatic Organisms, where the term 'aquatic plants' has been used for seaweeds, kelp and other relevant species.</p>
<u>2. The biodiversity of the aquatic environment and the quality of the surrounding water should be maintained</u>	<p>Country Position:</p> <p>The Philippines supports the inclusion of Paragraph 2 under Section A2 of the proposed draft.</p> <p>Rationale:</p> <p>Organic aquaculture is a strategic approach to develop and manage farms in a manner that conforms to the ecosystem approach by integrating aquaculture within the wider ecosystem and sustainability¹. As such, activities under organic aquaculture should be carried out in such a manner that produces the least effect on local biological and ecological processes and promote overall environmental integrity.</p> <p>¹<i>Draft Philippine National Standards for Organic Aquaculture. As of March 2016.</i></p>
B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS	
3. The plan <u>as referred to in section 6.8</u> should cover nutrient discharge, if applicable and the repair and surveillance of technical equipment. The organic management plan may also include a water quality monitoring scheme for early detection of potential contaminants from events such as an oil spill or other potential contamination of the harvest area	<p>Country Position:</p> <p>The Philippines supports the insertion of the phrase <u>as referred to in Section 6.8.</u></p> <p>Rationale:</p> <p>The reference to the relevant section provides for ease of use of the document, particularly since the expanded organic guidelines now covers several scopes, not only aquaculture.</p>

<p>Conversion Period</p> <p>8. [The conversion period should in general be at least one production cycle of the stock aquatic species. In cases where the water has been drained and the facility cleaned and disinfected with permitted cleaning materials a conversion period is not required. In the case of non- enclosed aquatic locations a shorter period of three months may apply provided that cages (net pens) have not been treated with prohibited antifoulants and there are no other sources of exposure to prohibited substances. During the conversion period the stock should not be subject to treatments or exposed to products which are not permitted for the production of organic foods.]</p>	<p>Country Position:</p> <p>The Philippines reiterates its position for the deletion of the square brackets under Paragraph 8 on Conversion period. Similarly, we support the inclusion of the words in bold text in the 1st, 2nd and 4th sentences.</p> <p>Rationale:</p> <p>The production cycle under controlled conditions of various aquatic animals cultured in different areas vary from species to species with other species having a shorter growing/grow out period than others.</p>
<p>Origin of Stock</p> <p>9. Breeds adapted to local conditions <u>without evidence of adverse effects on local habitat or native species</u> shall be chosen. Selection criteria should include their vitality and resistance to pests and diseases. Following the conversion period if organic aquaculture animals are not available, juvenile non-organic aquaculture stock, including wild sources, may be introduced for on-growing, provided that the latter two thirds of their production cycle or 90% of their final biomass is under organic management and providing the stock is healthy. Breeding stock should come from organic production units, where the parent stock have been under organic management for at least three months prior to breeding. For crustaceans, in cases where organic breeding stock is not available, wild caught parent stock may be used, provided that they are kept under organic management before breeding.</p>	<p>Country Position:</p> <p>The Philippines supports the inclusion of the underline words (1st and 2nd Sentence) in paragraph 9 of the proposed draft.</p> <p>Rationale:</p> <p>In consideration of the diversity in the aquaculture production systems, species and their requirements, steps to ensure that activities involved in the production cycle shall provide the least effect on local biological and ecological processes and promote overall environmental integrity, should be included as part of overall risk assessment and risk management strategies.</p>
<p>10. [When organic juveniles are not available, the Competent Authority may prescribe a time limit and percentage of non-organic juveniles, [including wild sources,] for use according to the production of the species. For bivalve shellfish, juveniles may be wild-harvested from outside of the production area, provided such harvesting is permitted by the competent authority, and records are kept to allow it be tracked back to the collection area. For species that cannot spawn naturally in captivity spawning may be induced using exogenous releasing hormones only if other methods are not available. Brood stock treated with releasing hormone shall lose organic status when slaughtered, the offspring will be organic if they have been raised according to this guideline. Genetically modified organisms (GMOs) and stock treated using hormones</p>	<p>Country Position</p> <p>The Philippines proposes the deletion of the square brackets and consequent adoption of Paragraph 10 in the proposed draft.</p> <p>Rationale:</p> <p>In consideration of the diversity in the aquaculture production systems, species and their requirements, it is recommended that competent authorities be given the task of recommending the prescribed time limits for use of organic juveniles and considerations and exemptions for other species given upon appropriate justification.</p>

must not be used.]	
<p>Health Care</p> <p>20. Disease prevention in organic aquaculture should be based on guidelines and standards set by the OIE and the principles and practices for health care of livestock (terrestrial animals) in these guidelines, specifically Annex I, B.1, paragraphs, 20, 21, 22 and 24 and on the following additional points:</p> <p>Ensuring that the site selection and design of the production unit is optimal and that there is regular cleaning and disinfection of premises with permitted substances where appropriate.</p> <p><u>Phytotherapeutic (excluding antibiotics), homeopathic or ayurvedic products and trace elements shall be used in preference to chemical allopathic veterinary drugs or antibiotics, provided that their therapeutic effect is effective for the species of animal for which the treatment is intended.</u></p>	<p>Country Position:</p> <p>The Philippines supports the inclusion of the 3rd Paragraph under Item 20 on Health Care in the proposed draft.</p> <p>Rationale:</p> <p>Item 20 provides a clear hierarchy of guidelines to follow in line with health care of the organic aquaculture organisms. Firstly, it emphasizes adherence to international requirements as set by OIE. Following this, as part of the principle of organic systems, proactive and preventive approaches are recommended to prevent diseases. As a next step, when treatment is necessary, the use of natural methods and medicines must be the first choice. Disease treatment must be carried out at once/immediately so that it minimizes harmful effects on the environment and the animal's health</p>

AGENDA ITEM 5 PROPOSED DRAFT REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS: DATE MARKING (AT STEP 3) CL 2014/30-FL, REP15/FL APPENDIX IV

Proposed Draft (At Step 3)	Comments
<p>2. DEFINITION OF TERMS</p> <p>For use in Date Marking of pre-packaged food:</p>	
<p>“Date of Manufacture” means the date on which the food becomes the product as described. <u>This is not an indication of the durability of the product.</u></p>	<p>Country Position:</p> <p>The Philippines reiterates its support for the inclusion of the last sentence in the definition of Date of Manufacture.</p> <p>Rationale:</p> <p>Though the Philippines does not support this date mark for pre-packaged retail product, the use of “Date of Manufacture” is useful for stock rotation/traceability for raw materials in bulk since normally a corresponding documentation for other information such as date of durability is still provided to the client.</p>
<p>“Date of Packaging” means the date on which the food is placed in the immediate container in which it will be ultimately sold. <u>This is not an indication of the durability of the product.</u></p> <p>“Sell-by-Date” means the last date of offer for sale to the consumer after which there remains a reasonable storage period in the home.</p>	<p>Country Position:</p> <p>The Philippines does not support the additional sentence in the definition for “Date of Packaging” since the definition is clear.</p> <p>Similarly, we support the deletion of “Sell by Date”</p> <p>Rationale:</p> <p>We do not support declaration of Sell by Date and the second sentence in the definition of Date of Packaging since these are not useful to the consumer.</p>
<p>“Date of Minimum Durability or Best before date” or Best Quality Before Date”) means the date which signifies the end of the estimated period, under any stated storage conditions, during which the product will remain fully marketable and will retain any specific qualities for which tacitimplied or express claims have been made.</p>	<p>Country Position:</p> <p>The Philippines supports the retention of “Best Before Date” and deletion of the terminology “Date of Minimum Durability”. We also reiterate our view to include the word estimated to clearly define this date marking. Lastly, we support the rewording of the term “tacit” to “implied”</p>

<p>However, beyond the date the food may still be acceptable for consumption</p>	<p>Rationale:</p> <p>We believe that “best before dates” refer to quality. As such we propose that with this date mark, “Use by date” or “Expiration Date” would still be indicated on the label to provide additional information to retailers and</p> <p><i>Continued...</i></p> <p>consumers when the product is no longer recommended to be consumed.</p> <p>Manufacturers conduct routine sampling during production as part of the overall control measures and also for actual verification of established shelf life of the products. Thus, indication of “expiration date” or “use by date” is generally complied with. The indication of “expiration date” or “use by date” is more useful and helpful to the consumer rather than putting the responsibility to consumer to estimate the durability of products beyond the declared best before date.</p>
<p>“Use-by Date” or “Use or Consume by date” or “Expires by” or “Expiration Date” means the date which signifies the end of the estimated period shelf life under any stated storage conditions, after which the product should not be sold or consumed due to safety reasons. After this date, the food should not be regarded as marketable.</p>	<p>Country Position:</p> <p>The Philippines supports the revision of the “use-by-date” definition. However, we also reiterate our position to retain the last sentence, and revise it accordingly, to read as “After this date, the food <i>should not be sold or consumed due to nutritional, quality and safety reasons</i>”</p> <p>Rationale</p> <p>The country has adopted this date marking for most if not all of its products to address the concerns of its consumers. The manufacturer has a responsibility to conduct a shelf life analysis before the declaration of this date mark. However, in the conduct of a shelf life study, quality parameters and other claims such for nutritional (e.g. fortification) purposes are also considered during the conduct of shelf life studies.</p> <p>Further, the Philippines also proposes that this type of date marking be present in all other date marking declaration to strengthen consumer understanding of the condition of the product and how to handle it.</p>
<p>4.7 Date marking and storage instructions</p> <p>4.7.1 If not otherwise determined in an individual Codex standard, the following date marking shall apply unless clause 4.7.1(v) applies:</p>	
<p>(i) When a food must be consumed before a certain date to ensure its safety or nutritional adequacy [for a particular population group for which the product is intended] the “Use –by Date” <u>or Use or Consume by date” or “Expires by” or “Expiration Date”</u> shall be declared</p>	<p>Country position:</p> <p>The Philippines only supports the deletion of the phrase in square brackets. Likewise, we propose to retain the phrase ‘nutritional adequacy, and revise it accordingly to include “or quality”.</p> <p>The proposed text will be:</p> <p><i>(i) When a food must be consumed before a certain date to ensure its safety <u>or quality or nutritional adequacy...</u>”</i></p> <p>Rationale:</p> <p>Regardless of the target population the date mark “use by date” or “expiration date” is the most appropriate term to provide information on the durability of the product. The phrase in square bracket should be deleted since the use of this date mark should</p>

	<p>not be limited to a specific group.</p> <p>Further, we reiterate our view that the manufacturer has a responsibility to conduct a shelf life analysis before the declaration of this date mark. In the conduct of a shelf life study, quality parameters are also included. Other claims such for nutritional (e.g. fortification) purposes are also considered during the conduct of shelf life studies.</p>
<p>(ii) Where a Use-by Date or <u>Use or Consumed by date or Expires by or Expiration Date</u> is not required the Best before Date <u>or Best Before Quality Date</u> or Date of <u>Minimum Durability shall be declared.</u></p>	<p>Country Position:</p> <p>The Philippines supports this provision only for those products that are found in the exemption list (e.g. fresh produce)</p> <p>Likewise, we would like to pose a clarification regarding the criteria used in identifying the products listed in the list.</p>
<p>(iii) <u>The</u> date marking <u>should be as follows:</u></p> <ul style="list-style-type: none"> On products with a minimum durability of not more than three months the day and month <u>and year</u> shall be declared: more than three months the month and year shall be declared On products with a durability of more than three months <u>at least</u> the month and year shall be declared 	<p>Country Position:</p> <p>The Philippines supports this provision for products with minimum durability. However the “use by date’ should be indicated rather than other date marking.</p> <p>Rationale:</p> <p>We believe that this shall accurately guide the consumer as to the limited shelf life of the product</p>
<p>(iv) The date shall be <u>introduced</u> by the words:</p> <ul style="list-style-type: none"> “Use-by...” or “Best before...” as applicable where the day is indicated; or “Use-by end...” or “Best before end...” as applicable in other cases. The words referred to in <u>this</u> paragraph (iv) shall be introduced and used by accompanied by: <ul style="list-style-type: none"> either the date itself; or a reference to where the date is given. <p>The day and year shall may be declared by uncoded numbers numerical sequence except that with the year to be denoted by <u>2 or 4</u> digits, and the month shall be declared by letters or characters <u>or numbers</u>. in those countries where such use will not confuse the consumer. <u>Where only numbers are used to declare the date or where the year is expressed as only two digits, the sequence of the day month year must be given by appropriate abbreviations accompanying the date mark(e.g. DD/MM/YYYY)</u> The declaration of the month in date marking shall be consistent with 8.2.</p>	<p>Country position:</p> <p>The Philippines supports the proposal of indicating the <u>year by 2 or 4 digits</u>, and the <u>month declared by letters or numbers</u>. We also strongly support the addition of the last sentence, providing an appropriate abbreviation of the sequence of the day-month-year. However, we recommend the use of the word MAY in the last sentence, to read as:</p> <p>“...Where only numbers are used to declare the date or where the year is expressed as only two digits, the sequence of the day month year must<u>MAY</u> be given by appropriate abbreviations accompanying the date mark(e.g. DD/MM/YYYY)”</p> <p>Rationale:</p> <p>The format as to how dates are denoted/stated in the label should be clearly provided for appropriate guidance ton consumers. Regardless of the format, (dd/mm/yy or mm/dd/yy) the confusion can be addressed by a clearer delineation/description for month and year.</p> <p>Furthermore, we believe that it would facilitate understanding for the part of the consumers since every country has its own unique format for date marking.</p>

<p>[(Notwithstanding 4.7.1 (i) and 4.7.1 (ii) a date of minimum mark durability or best before date or best before quality date shall not be required for:</p> <ul style="list-style-type: none"> • fresh fruits and vegetables, including potatoes tubers which have not been peeled, cut or similarly treated; • wines, liqueur wines, sparkling wines • <u>alcoholic beverages containing at least 10% alcohol by volume, except those beverages that contain ingredients with protein such as milk and dairy products, eggs and derivatives and plant material which will have a different stability behavior related to their shelf life.</u> • Bakers' or pastry-cooks' wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture; • <u>Naturally fermented white or brown vinegar and white or brown acetic acid</u> vinegar; • <u>Non-iodized</u> food grade salt; • Solid sugars; • Confectionery products consisting of flavoured and/or coloured sugars; • Chewing gum 	<p>Country Position:</p> <p>The Philippines would like to seek clarification on the criteria used to identify the products listed in the list.</p>
<p>Where a product is not required to bear a date mark in accordance with <u>4.7.1 (vii) provision</u> the "Date of Manufacture" or the "Date of Packaging" <u>may/shall</u> be used.]</p>	<p>Country Position:</p> <p>The Philippines does not support these date mark provisions for pre-packaged retail food product.</p> <p>Rationale:</p> <p>These date marks are useful for products not intended to be purchased by the final consumer like bulk packaging for further processing, for stock and traceability purposes.</p>
<p><u>[(x) Only one [type of] date mark should be used on a product at any one time.]</u></p>	<p>Country position:</p> <p>The Philippines does not support the limiting of one type of date mark.</p> <p>Rationale:</p> <p>If another date mark declaration is necessary for a better and clearer description of product condition and use, declaration should not be restricted to only one type of date mark. Likewise, we believe that as long as the date mark is clearly understood by the consumer, then it may be allowed.</p>
<p>In addition to the date of minimum durability date mark, any special conditions for the storage of the food shall be declared on the label where</p>	<p>Country position</p> <p>The Philippines supports having a declaration of storage condition especially the declaration of temperature and relative humidity.</p>

<p>they are required to support the integrity of the date mark. if the validity of the date depends thereon</p>	<p>Rationale: This is important when exporting products from a different climatic region.</p>
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AGENDA ITEM 6 DRAFT GENERAL STANDARD FOR THE LABELLING OF NON-RETAIL CONTAINERS OF FOOD CX/FL 16/43/6

Philippine Position

The Philippines reiterates its support to the proposal of India to develop a guideline for the labeling of “Non-retail container” since there are differences in the information provided in imports and exports of these products. We further support the expansion of CODEX STAN 1-1985 General Standard for the Labeling of Prepackaged Foods to include provisions relevant to food in non-retail containers.

Rationale:

With a single guideline, alignment and consistency in labeling food of various types (prepackaged, in bulk non-retail container) and intended uses can be facilitated.

To reiterate our previous position, exemptions in some mandatory labelling information can be provided for bulk materials in consideration on how this category of products is traded. A logical approach on the right to exclusivity of the formulation and proprietary agreement between the manufacturer and supplier may be given due consideration, where most of the important labelling and technical information is provided specific to the client who will be using the product.

The following are the specific comments on the proposal. Other provisions found in the Codex General Standard on prepackaged food have been deleted and the only provisions retained on the proposed document are commented as follows:

New Proposal	Philippines Comments
<p>TITLE General Standard for the labelling of prepackaged foods and <u>foods in non-retail containers</u></p>	<p>Country Position The Philippines supports the revision of the title and scope to reflect the expansion of the Codex General Standard for Labelling of Prepackaged Foods to include guidelines for foods in non-retail containers.</p>
<p>2. SCOPE This standard applies to the labelling of all prepackaged foods to be offered as such to the consumer or for catering purposes and to certain aspects relating to the presentation thereof. <u>It also applies to the labelling of foods in non-retail containers that are not intended to be sold directly to the consumers</u></p>	<p>Rationale: As previously conveyed, we believe that a single guideline, alignment and consistency in labeling food of various types (prepackaged, in bulk non-retail container) and intended uses can be facilitated by revising the existing Codex General Standard for labeling without the need to draft a separate standard.</p>
<p>3. DEFINITION OF TERMS <u>Non-Retail Containers” means any container which contains food or food material of same kind, prepackaged or not, intended for business to business trade and not for direct sale to the consumer.”</u></p>	<p>Country Position The Philippines supports the proposal to define ‘Non-retail container’. Consequently, we propose to revise the phrase ‘prepackaged or not’ with ‘in bulk or in small packages’, with the new definition to read as: ‘Non-retail containers’ means any container which contains food or food material of same kind, in bulk or in small packages, intended for business to business trade and not for direct sale. Rationale: As defined in the Standard (Codex STAN 1-1985 General Standard for the Labelling of Prepackaged Foods), ‘prepackaged’ means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes.</p>

	<p>Non-retail containers usually come in form of bulk packages. However, some non-retail containers come in the form of small packages (ex. Food additives) but not intended for offer to the consumer.</p> <p>As such, to differentiate ‘pre-packaged’ from ‘non-retail containers’, specifically those that are packaged but not directly sold to the consumer, we believe that the phrase <u>‘in bulk or in small packages’</u> more aptly describes forms or types of packaging of foods in non-retail containers.</p>
<p>3. GENERAL PRINCIPLES</p> <p>3.1 Prepackaged food or <u>food in non-retail container</u> 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.</p> <p>3.2 Prepackaged food or <u>food in non-retail container</u> 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</p>	<p>Country Position:</p> <p>The Philippines supports the proposal to add the phrase <u>food in non-retail container</u> in Sections 3.1, 3.2 and 4, as a reflection of the expansion of the Standard to include guidelines for foods in non-retail containers.</p>
<p><u>4. MANDATORY LABELLING OF PREPACKAGED FOODS</u></p> <p>The following information shall appear on the label of prepackaged foods <u>or food in non-retail container</u>, as applicable to the food being labelled, except to the extent otherwise expressly provided in an individual Codex standard:</p>	
<p>4.1 The name of the food</p> <p>4.1.2 There shall appear on the label either in conjunction with, or in close proximity to, the name of the food, such additional words or phrases as necessary to avoid misleading or confusing the consumer <u>or competent authority in the country of sale</u> in regard to the true nature and physical condition of the food including but not limited to the type of packing medium, style, and the condition or type of treatment it has undergone: for example: dried, concentrated, reconstituted, smoked.</p>	<p>Country Position:</p> <p>The Philippines does not support the revision/addition of the phrase <u>or competent authority in the country of sale</u>.</p> <p>Rationale:</p> <p>We believe that the original text already provides a clear and straightforward objective that ultimately aims to avoid misleading or confusing the consumer.</p>
<p>4.3 Net contents and drained weight: <i>Insert note after sub-section 4.3.3 as follows:</i></p> <p><u>Note: In case of foods in non-retail containers, the weight and or quantity should be declared in either the metric system (System international Units) or avoirdupois pound or both the systems of measurement as required by country in which the food is intended be sold. This declaration, case of foods in non-retail containers, may be made in terms of net or</u></p>	<p>Country Position:</p> <p>The Philippines does not support the insertion of the Note after sub-section 4.3.3. Instead, we propose that Section 4.3 on Net contents and drained weight explicitly state that provision for net content and drained weight applies to both prepackaged foods and foods in non-retail containers.</p> <p>Rationale:</p> <p>We believe that the declaration of net contents and drained weight as provided in the original standard is applicable for both prepackaged foods and foods in non-retail containers.</p>

<p><u>gross contents as required by the country in which the food is intended to be sold.</u></p>	
<p><u>4.9 Provision for food in non-retail container: The following information if not provided in the label shall be provided in the accompanying documents</u></p> <p><u>(i) list of ingredients</u></p> <p><u>(ii) Nutritional information</u></p> <p><u>(iii) List of food additives</u></p> <p><u>(iv) Name and address of the manufacturer or packer</u></p> <p><u>(v) Country of origin</u></p> <p><u>(vi) Any other information required by the importing country example Halal Certification, Kosher Certification, Vegetarian/Non vegetarian logo</u></p>	<p>Country Position:</p> <p>The Philippines supports this provision wherein the list of ingredients is not required as a mandatory label declaration for food in non-retail container. since a product technical information file where a disclosure of the list of ingredients shall always be part of standard documents to be provided to parties that purchase/use the food.</p> <p>Rationale:</p> <p>We are of the opinion that declaration of the list of ingredients on the label of food in non-retail container is not necessary since the product will not be directly sold to the consumer. The list of ingredients in the product technical information file will serve the purpose of disclosing the product's composition.</p> <p>Country Position:</p> <p>The Philippines also proposes to include "Allergen Declaration" either on the label or in the technical information sheet.</p> <p>Rationale:</p> <p>The Allergen information, Country of Origin, Manufacturer name and address and other information required by the importing country should be sufficient for the intended use.</p>
<p><u>4.10 Non-retail container of food shall bear the statement "NON-RETAIL CONTAINER-NOT FOR DIRECT SALE TO CONSUMER" OR "NOT FOR DIRECT SALE TO CONSUMER" as acceptable in the country of sale</u></p>	<p>Country Position:</p> <p>The Philippines supports the inclusion of the proposed statement. However, we propose to include the phrase or <u>other equivalent terms</u> to the 4.10, to read as:</p> <p>"4.10 Non-retail container of food shall bear the statement "NON-RETAIL CONTAINER – NOT FOR DIRECT SALE TO CONSUMER" OR "NOT FOR DIRECT SALE TO CONSUMER <u>or other equivalent terms</u> as acceptable in the country of sale. "</p> <p>Rationale:</p> <p>Other phrases may be allowed as "not for commercial use" or similar expression. This will also protect the exclusivity of the formula/blend and promotes product traceability.</p>
<p>5. ADDITIONAL MANDATORY REQUIREMENTS:</p> <p>5.1 Quantitative ingredients declaration: <u>(Not applicable to Non-retail Containers)</u></p>	<p>Country Position:</p> <p>The Philippines supports the addition of the phrase in parentheses <u>(Not applicable to Non-retail containers)</u>.</p> <p>Rationale:</p> <p>The declaration of the quantity of ingredients compromises a food producer's ability to safeguard its formulation (ex. this will also protect the exclusivity of the formula/blend)</p>
<p>8. PRESENTATION OF MANDATORY INFORMATION</p> <p>8.1 General</p>	
<p>8.1.1 Labels in prepackaged foods and <u>non-retail containers</u> shall be applied in such a manner that they not become separated from the container</p>	<p>Country position:</p> <p>The Philippines supports the proposal to add the phrase <u>non-retail container</u> in Sections 8.1.1</p>

	<p>Rationale:</p> <p>This reflects the revision of the Standard to include guidelines for foods in non-retail containers.</p>
<p>8.2 Language</p> <p>8.2.1 if the language on the original label is not acceptable, to the consumer for whom it is intended <u>or competent authority in the country of sale</u>, a supplementary label containing the mandatory information in the required language may be used instead of relabeling.</p>	<p>Country Position:</p> <p>The Philippines proposes to insert the revised phrase <u>or in the country of sale</u>.</p> <p>Rationale:</p> <p>We believe that in case the language is not the acceptable language in the country of sale (e.g. not English), a supplementary label containing the mandatory information in the required language may be used instead of relabeling.</p>