



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-third Session

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DISCUSSION PAPER ON LABELLING OF NON-RETAIL CONTAINERS

(Prepared by India)

1. Introduction

1. At the 41st session of the CCFL (May 2013), the Delegation of India, outlining the issue of absence of any general guidelines for labelling of wholesale packages, made a proposal to develop a 'General Standard for the Labelling of Wholesale Packages of Food'. After some discussion, the Committee agreed that the Delegation of India would prepare a discussion paper on the labelling of non-retail containers that would identify gaps in Codex texts and implications for international trade and consumer protection for further discussion at the next session.

2. Accordingly, India had prepared this discussion paper for consideration of the Committee at its 42nd session (October 2014). Additionally, India had attempted to develop a project document and a draft of the proposed General Standard for Labelling of Non-Retail Containers of Food. At the session, however, the Agenda Item 6 - Labelling of non-retail containers (Discussion paper) (CX/FL 14/42/6) could not be discussed in the plenary owing to lack of time and is due for discussion at the 43rd Session of the Committee (REP/15 FL, Para 83).

3. It is appropriate to highlight that, based on the informal inputs from delegations during the 42nd CCFL, it is now proposed to develop the guidance through a limited revision of the *General Standard for Labelling of Prepackaged Foods* (CODEX STAN 1-1985) (GSLPF). This would require adjusting the scope of the GSLPF and amending its title to accommodate non-retail containers appropriately. The discussion paper has been accordingly revised. The Project Document (Annex 1) and the draft Proposed Text to Provide Guidance for Labelling of Non-Retail Containers of Food (Annex 2) are intended to facilitate better understanding of the proposal. The text in Annex 2 is also intended to provide a starting point for discussion and is proposed to be discussed for its appropriateness for labelling of non-retail containers.

4. It is anticipated that development of the proposed guidance will be extremely useful to all countries, especially developing countries that depend more on Codex standards, and address several operational issues in the context of their exports and imports of bulk packaged food.

5. The terms 'prepackaged', 'consumer' and 'container' used in this Discussion Paper have the meaning as defined in the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985)¹.

6. The term 'non-retail container' of food in this discussion paper has been used to refer to a food package that is not intended to be sold directly to the consumer but only from one food business operator to another. The distinction of such food packages is purely based on the intent of sale.

2. Background

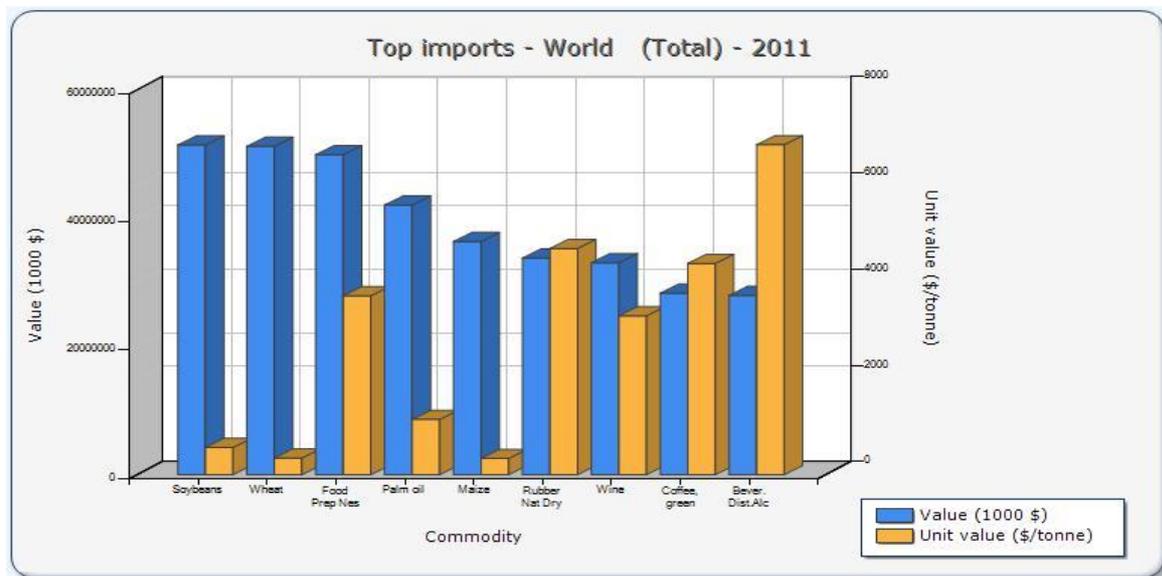
7. Over the last century the amount of food traded internationally has grown appreciably and the quantity and variety of food which travels across the globe today was never witnessed before. There has been a steady annual growth of 5.1% in food trade during 1980-2009².

1 "Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes. "Consumer" means persons and families purchasing and receiving food in order to meet their personal needs.

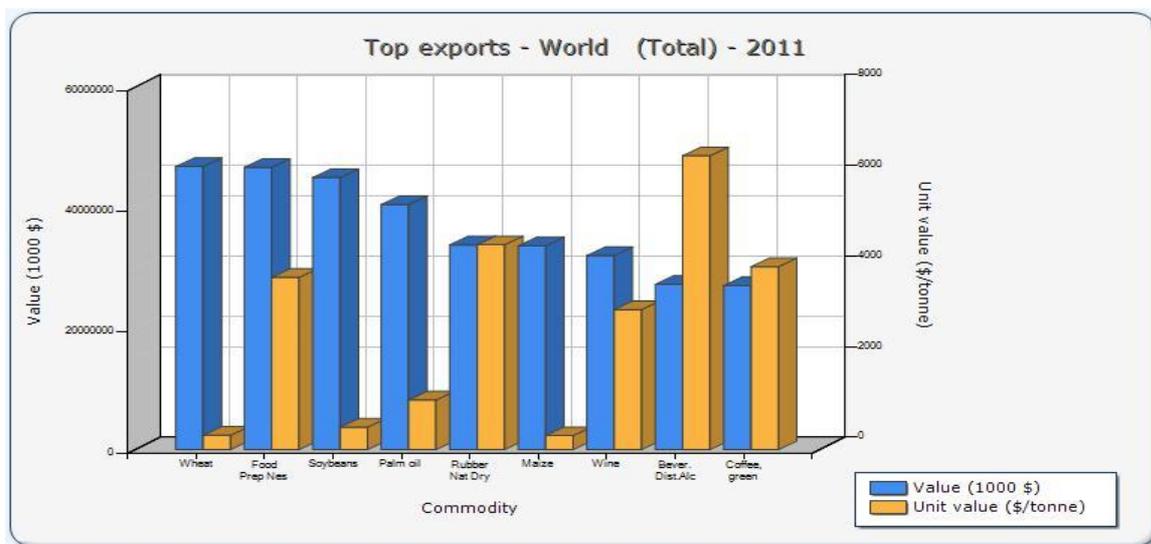
"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer.

2 Stefan Tangermann (2010), *Agricultural Trade 1980 vs. 2010: Some Progress, But Still So Far to Go*, World Bank Institute

8. There also has been accelerated growth in non-traditional high value agri-food products by developing economies leading to a structural shift in composition away from traditional exports like coffee, tea, sugar etc. to higher-value non-traditional products like fresh/processed fruits and vegetables, meat and fish products, nuts, spices and horticultural products. The graphs below indicate top imports and exports values in the world for 2011.



Source: FAOSTAT



Source: FAOSTAT

9. India exported food products worth USD 20,887 million and imported the same worth USD 15,458 million during 2013-14. The tables below provide related information.

EXPORT OF FOOD PRODUCTS FROM INDIA (April 2013 - February 2014)

PRODUCTS	VALUE (USD Million)
Dairy Produce; Birds' Eggs; Natural Honey; Edible Prod. of Animal Origin, Not Elsewhere Spec. or Included	703.83
Edible Vegetables and Certain Roots and Tubers.	1,354.04
Edible Fruit and Nuts; Peel or Citrus Fruit or Melons.	1,621.72
Coffee, Tea, Mate and Spices.	2,741.69
Cereals.	10,548.25
Products of the Milling Industry; Malt; Starches; Inulin; Wheat Gluten.	298.67
Animal or Vegetable Fats and Oils and their Cleavage Products; Pre. Edible Fats; Animal or Vegetable Waxes	858.21
Sugars and Sugar Confectionery.	1,347.74
Cocoa and Cocoa Preparations.	93.57
Preparations of Cereals, Flour, Starch or Milk; Pastrycooks Products.	463.10
Preparations of Vegetables, Fruit, Nuts or Other Parts of Plants.	449.47
Beverages, Spirits and Vinegar.	407.46
Total	20,887.75

Source: Export Import Data Bank, Department of Commerce, India

IMPORT OF FOOD PRODUCTS INTO INDIA (April 2013 - February 2014)

PRODUCTS	VALUE (USD Million)
Animal or Vegetable Fats and Oils and their Cleavage Products; Pre. Edible Fats; Animal or Vegetable Waxes.	9428.00
Beverages, Spirits and Vinegar	426.51
Cereals	22.08
Cocoa and Cocoa Preparations.	176.82
Coffee, Tea, Mate and Spices	526.54
Dairy Produce; Birds' Eggs; Natural Honey; Edible Prod. of Animal Origin, not Elsewhere Spec. or Included	37.21
Edible Fruit and Nuts; Peel or Citrus Fruit or Melons	2062.17
Edible Vegetables and Certain Roots and Tubers	2141.41
Fish and Crustaceans, Molluscs and Other Aquatic Invertebrates	44.61
Preparations of Cereals, Flour, Starch or Milk; Pastrycooks Products.	42.09
Preparations of Meat, of Fish or of Crustaceans, Molluscs or Other Aquatic Invertebrates	3.78
Preparations of Vegetables, Fruit, Nuts or Other Parts of Plants.	75.96
Sugars and Sugar Confectionery.	471.49
Total	15,458.67

Source: Export Import Data Bank, Department of Commerce, India

10. The food products that are traded internationally generally employ some form of packaging. This calls for clear unambiguous labelling on the packages. This packaged food can be further classified into two categories – (1) 'pre-packaged' as defined in the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) and (2) the food that is packaged but is traded business to business and is not intended to be sold directly to the consumer (e.g. commodities traded business to business including intermediate products and products for re-packaging in smaller quantities /consumer packs).

11. Most member countries, and more specifically developing countries, base their labelling requirements on relevant Codex standards, the most relevant in this case being the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985). This standard comprehensively

addresses labelling requirements for 'pre-packaged' food (to be sold directly to the consumer) and is appropriate for use as reference standard for the same. Certain commodity standards elaborated by the Codex Alimentarius Commission contain a brief section on labelling of non-retail containers that applies to specific commodities but does not address the wide array of foods that are traded in non-retail containers. There is, thus, no single reference guidance on labelling provisions for food packages that are not intended to be sold directly to the 'consumer'.

12. In the absence of general reference guidance, the Competent Authorities in developing countries find it difficult to put in place, in their national food legislation, explicit and appropriate harmonized provisions on labelling of food packages that are not intended to be sold directly to the consumer.

13. Experience with regard to labelling of non-retail containers indicates that different importing partners call for different labelling requirements on the business to business traded food commodities making it extremely cumbersome for the industry to comply. Also, in the absence of a relevant international reference guidance, exporting partners often question certain labelling requirements of importing partners citing difficulties in complying owing to different requirements being mandated by their food legislation that they are obliged to comply with. There are other associated issues as well, as discussed in the Section 5 below.

14. With a view to resolve the issues surrounding the lack of a reference guidance text for labelling of food packages not intended to be sold directly to the consumer, India had made a proposal for new work in the 41st session of the CCFL. The Committee had agreed that the Delegation of India would prepare a Discussion Paper for consideration at its next session. At the 42nd session of the CCFL (October 2014), however, the Agenda Item 6 "Labelling of Non-Retail Containers" (Discussion paper) (CX/FL 14/42/6) could not be discussed in the plenary owing to lack of time and is due for discussion at the 43rd Session of the Committee (REP/15 FL, Para 83).

3. Scope of the work

15. The proposal is to develop guidance for labelling of non-retail containers of food through limited revision of the *General Standard for Labelling of Prepackaged Foods* (CODEX STAN 1-1985) along with necessary revision of its title and scope, and other consequential amendments for the purpose.

16. The proposed guidance will provide appropriate harmonized labelling requirements for food packages that are not intended to be sold to consumer directly (i.e. non-retail containers). The proposal inherently includes addressing the issue of differentiation between retail and non-retail containers to enable application of relevant labelling provisions.

17. Certain Codex commodity standards contain a brief section on labelling of non-retail containers. A list of these standards is provided in the Annex 3. It is also necessary to review these for suitable amendment once the decision to include the labelling provisions relating to non-retail containers in the GSLPF is implemented. This can be done by the CCFL itself based on its responsibility of endorsement of the labelling provisions.

18. A suitable term (e.g. 'non-retail container') will be identified and defined in the proposed standard to designate such food package that are not intended to be sold directly to the consumer.

19. The proposal does not seek to open discussions on labelling of 'pre-packaged' food, for which adequate guidance is available in the CODEX STAN 1-1985, or any other form/aspect of labelling that is not included above.

4. Assessment of Gaps

20. The *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) provides elaborate and unambiguous labelling requirements for the 'pre-packaged' foods. Most of the member countries use it as a reference standard and base their national labelling requirements on the guidance provided in it. This standard, however, does not appear to be intended to address labelling of non-retail containers of food in a specific manner.

21. It may also be recalled that CCFL had earlier also attempted to develop draft guidelines for Labelling of Non Retail Containers of Food at its 13th Session in 1979 (ALINORM 79/22, APPENDIX IV). However, in 1985, at its 18th Session, the Committee decided to discontinue this work at that time and include suitable instructions for labelling provisions for non-retail containers into the Guidelines on Labelling Provisions (ALINORM 85/22A, APPENDIX VIII, Para 4, Bullet 2). These instructions are included in the Codex Alimentarius Procedural Manual (Format for Codex commodity standards, Pages 56-57). Accordingly, the Codex commodity standards identified in Annex 3 contain provisions for labelling of non-retail containers of food

22. Preliminary analysis of these indicates that out of 212 Codex commodity standards, there are about 137 commodity standards that contain labelling provisions for 'non-retail containers' whereas 17 commodity standards contain labelling provisions for 'bulk containers'. These apply to specific commodities but do not comprehensively address labelling of the wide array of foods packaged in non-retail containers. Also, though used, there is no definition for the term 'Non-retail container' in these standards. Thus, the existing provisions in the Codex Procedural Manual and resulting inclusions in the commodity standards of provisions on labelling of non-retail containers/bulk containers (both terms not defined) do not provide a general labelling provision for non-retail containers that can be applied to all foods in a manner similar to the provisions of GSLPF for prepackaged foods.

23. The *Guidelines for Design, Production, Issuance and Use of Generic Official Certificates* (CAC/GL 38) does not deal with labelling but can be used to produce documentation that can accompany a consignment and would generally provide adequate information to the intermediate buyer/recipient about the product. This can be utilized effectively in respect of the food that is transported singly in a container. However there could often be several different types of packaged food transported in the same transport container. For the reasons of identification and information to customer/authorities, such packaged food requires appropriate and clear labelling, guidance on which is not available. The other import export related Codex texts (Annex 3) do not relate to labelling or provide an alternative mechanism for exchange of relevant information about the product between the buyer and seller during trade.

24. The *General Standard for the Labelling of Food Additives When Sold As Such* (CODEX STAN 107-1981) in its Section 5 includes guidance on labelling of food additives when sold as other than retail sale. It also uses the term 'non-retail container' but does not include a definition for the term.

25. There is, thus, no single reference standard on labelling provisions for food containers that are not intended to be sold directly to the 'consumer'. This lack of a relevant standard has often resulted in undesirable situations that impact the international trade adversely. Some of these problems are highlighted in the subsequent section.

5. Issues

26. The lack of guidance on labelling of food containers not intended to be sold directly to the consumer is known to result in following issues:

- Countries mandating labelling requirements for 'pre-packaged' (as per CODEX STAN 1-1985) foods on the packages of food that are not intended to be sold directly to the consumer. This is especially true for countries that do not have clear relevant guidance in national legislation. Despite the fact that this standard (CODEX STAN 1-1985) is intended to be applicable to 'pre-packaged' food for 'consumer', countries often consider it safer and in compliance with the guidance in the *Principles for Food Import and Export Inspection and Certification* (CAC/GL 20-1995)³, to adopt and apply the same provisions for non-retail containers. This really is not appropriate. It cannot be over emphasized that the labelling of food containers not to be sold directly to the consumer needs to be treated differently from those to be sold directly to the consumer for economical (there is a cost to printing), logical and practical reasons (e.g. it needs to be carefully considered if information like nutritional information, instructions for use, allergen declaration⁴ etc. are useful on the label of non-retail containers of food);
- Where national standards exist in the context, lack of a reference standard has resulted in diversity of national legislations. Different approaches being adopted across countries force exporters to meet multiple sets of labelling provisions based on the requirements of the importing partners. This has feasibility related and cost implications;
- Variations exist in the guidance on labelling of non-retail containers and bulk containers even in the Codex commodity standards (listed in Annex 3);
- Unnecessary discussions among trading partners to come to an agreement on information necessary to be placed on the label of non-retail containers of food;
- Lack of uniformity in labelling on the food packages received from different countries confuses the competent authorities and leads to delays in port clearances;
- Conditions forcing/allowing extempore discretion by the concerned officials in the competent authorities which leads to inconsistent decisions and associated problems. Such inconsistent

³ Para 11 of CAC/GL 20-1995 mentions that the member countries should use Codex standards, recommendations and guidelines whenever appropriate as elements of their inspection and certification systems.

⁴ These are just indicative examples in the context and are not intended to indicate final provision in the proposed standard which would be subject to discussions and finalization in the Committee

discretionary actions also have potential for creating non-tariff barriers to trade;

- Delay in port clearance leads to reduction in the available shelf life of the food and also has cost implications (e.g. Demurrage);
- Rejection of food consignments on labelling grounds contributes to wastage of food.

27. The above issues indicate that lack of clear guidance on labelling of non-retail containers of food not intended to be sold directly to the consumer can result in operational issues and cost implications and contribute to food wastages. This lack of guidance also has the potential to result in unfair practices (non-tariff barriers) in food trade.

6. Recommendation

28. It is recommended that the Committee:

- i. agree to initiate new work to develop guidance for labelling of non-retail containers of food through a limited revision of the *General Standard for Labelling of Prepackaged Foods* (CODEX STAN 1-1985) along with necessary revision of its title and scope, and other consequential amendments for the purpose, and;
- ii. submit the attached Project Document (Annex 1) for approval by the Codex Alimentarius Commission.

PROJECT DOCUMENT

Revision of the *General Standard for the Labelling of Prepackaged Food* (CODEX STAN 1-1985) to include guidance for the labelling of non-retail containers of food

1. Purpose and Scope

The proposal seeks to initiate work on development of guidance for labelling of non-retail containers of food through limited revision of the *General Standard for Labelling of Prepackaged Foods* (CODEX STAN 1-1985), together with necessary revision of its title and scope for the purpose, as the existing standard (CODEX STAN 1-1985) gives labelling guidelines for prepackaged foods only, that are meant for direct sale to the consumer.

It will also be required to suitably amend the Codex Commodity Standards that include labelling provisions for non-retail containers, once the proposed labelling provisions of non-retail containers are included in the GSLPF.

The proposal does not seek to open discussions on labelling of 'pre-packaged' food, for which adequate guidance is available in the CODEX STAN 1-1985.

Suggested amendments are indicated in the Annexure 2 of the discussion paper "Draft text on guidance for the labelling of non-retail containers of foods".

2. Relevance and timeliness

The labelling of non-retail containers needs prominence and worldwide uniform compliance and understanding which is very much needed for smooth and efficient transaction of trade. Inappropriate labelling of non-retail containers of food is a matter of significant concern in a number of developing countries. Lack of guidance which could be considered as the reference in this context causes several issues including operational issues and cost implications and contributes to food wastage. Lack of guidance may also negatively impact food safety in certain situations and has the potential to result in unfair practices (non-tariff barriers) in food trade.

It is anticipated that development of the proposed guidance will be extremely useful to all the countries, especially the developing countries that depend more on Codex standards, and address several operational issues in the context of their exports and imports of bulk packaged food.

3. The main aspects to be covered

The main aspects to be covered include the following:

- Developing appropriate terminology (e.g. non-retail container) to be used to designate the containers of food that are not intended to be sold directly to the consumer; and
- Establishing appropriate labelling requirements in the context of food traded internationally in packages that are not intended for sale directly to the consumer, including necessary means to distinguish such containers of food from prepackaged food intended to be sold directly to the consumer. This will also include, as appropriate based on a review, the relevant guidance on labelling of bulk/non-retail containers from the Codex commodity standards.

4. Assessment against the Criteria for the Establishment of New Work Priorities:

General criterion

The Codex Alimentarius Commission has a twin mandate of protecting consumer's health and ensuring fair practices in the food trade.

There has been an increase in trade of raw materials and intermediary ingredients between businesses which are not meant for direct sale to consumers. Lack of a global reference standard for such non-retail containers of foods results in several trade related operational issues, has undue cost implications and contributes to food wastage. It may also negatively impact food safety in certain situations and has the potential to result in unfair practices (non-tariff barriers) in food trade.

Development of the proposed guidance can address the above issues and thereby contribute to fulfilling the mandate of the Codex Alimentarius Commission.

Criteria applicable to general subjects

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

Lack of reference guidance on labelling requirements for non-retail containers of food has resulted in diversity of national legislations. Different approaches being adopted across countries force exporters to meet multiple sets of labelling provisions based on the requirements of the importing partners. This leads to feasibility issues and has cost implications for the exporters apart from confusion among the concerned authorities. The proposed guidance will provide a harmonized approach in the context that the countries can follow.

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

All the aspects of the work, as detailed in the Section 3 above, can be undertaken simultaneously to produce a comprehensive General guidance for the Labelling of Non-retail Containers of Food.

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

Codex is the relevant international organization responsible for developing international standards in this area and we are not aware of any other international organization working in this area.

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

Most member countries, and more specifically developing countries, base their labelling requirements on relevant Codex standards. The purpose of the new work is to develop unambiguous labelling requirements for non-retail containers of food that are not meant for direct sale to the consumer. The labelling requirements of non-retail containers can be effectively standardized with the involvement of and inputs from the Codex members.

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

Experience with regard to labelling of non-retail containers indicates that different importing partners call for different labelling requirements on the business to business traded food commodities making it extremely difficult for the industry to comply. Lack of appropriate labelling, in the absence of clear labelling guidelines for non-retail containers, is one of the leading causes for delays in import clearances and rejections which in turn lead to reduction in the available shelf life and/or wastage of food. It may also negatively impact food safety in certain situations and has the potential to result in unfair practices (non-tariff barriers) in food trade. These problems extend beyond particular regions and solution to the same is of global relevance and interest.

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. To fulfil the objective of fair practices in food trade, it is also essential to distinguish between prepackaged and non-retail containers, and provide unambiguous guidance on labelling of the latter that are not intended to be sold directly to the consumer.

The proposed work will contribute to advancing the following Codex Strategic Goals in the Codex Strategic Plan 2014-2019:

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

Lack of appropriate labelling of non-retail containers of food, owing to lack of a reference standard in the context, is a matter of significant concern in international food trade. The proposed development of a General guidance for the Labelling of Non-Retail Containers of Food is consistent with the direction elaborated under Goal 1, that is, establish international food standards that address current and emerging issues.

Strategic Goal 3: Facilitate the effective participation of all Codex Members.

The development of the General guidance for the Labelling of Non-Retail Containers of Food is expected to generate interest in participation from all countries. The work on development of the draft guidance can be initiated through an electronic working group to foster increased participation.

6. Information on the relation between the proposal and other existing Codex documents as well as other on-going work

This document will be developed taking into account the relevant guidance from the following:

- *Codex Alimentarius Commission Procedural Manual (Format for Codex Commodity Standards-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);
- Relevant Codex commodity standards that include labelling provisions for non-retail containers/bulk containers.

7. Identification of any requirement for and availability of expert scientific advice

No requirement of expert scientific advice is envisaged at this stage. Interaction may be needed with the relevant Codex commodity committees concerning the commodity standards that contain labelling provisions for non-retail containers.

8. Identification of any need for technical input to the standard from external bodies so that this can be planned for

No need for technical input from external bodies is envisaged at this stage.

9. Proposed timeline for completion of the new work including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should normally not exceed five years.

Owing to the general nature of the work and its importance to developing countries, a faster timeline is proposed as follows:

Proposed timeline*

May 2016: Endorsement of the proposed new work by the 43rd Session of Codex Committee on Food Labelling (CCFL).

July 2016: Approval of the new work by the 39th session of Codex Alimentarius Commission.

October 2017: Consideration of the draft guideline at Step 3 by the 44th Session of CCFL.

July 2018: Final adoption by CAC at Step 5A (or 5/8).

*Considering CCFL meets in approximately 18 months interval.

ANNEX 2

DRAFT TEXT ON GUIDANCE FOR THE LABELLING OF NON-RETAIL CONTAINERS OF FOODS
(ONLY THOSE SECTIONS TO WHICH AMENDMENTS ARE REQUIRED IN THE GSLPF ARE SHOWN HERE)

TITLE: Amend as follows-

GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS **AND FOODS IN NON-RETAIL CONTAINERS**

1. SCOPE: Amend as follows-

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. **It also applies to the labelling of foods in non-retail containers that are not intended to be sold directly to the consumer.**

2. DEFINITION OF TERMS: Include the following new definition-

"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."

3. GENERAL PRINCIPLES: Consequential amendments necessary as follows-

- 3.1 Prepackaged food **or food in non-retail container** 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.¹
- 3.2 Prepackaged food **or food in non-retail container** 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.

4. MANDATORY LABELLING OF PREPACKAGED FOODS : Amend title of Section 4 as shown above and amend first paragraph as follows-

The following information shall appear on the label of prepackaged foods **or food in non-retail container**, as applicable to the food being labelled, except to the extent otherwise expressly provided in an individual Codex standard:

4.1 The name of the food: Amend sub-section 4.1.2 as follows-

- 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 **or competent authority in the country of sale** 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.

4.3 Net contents and drained weight: Insert note after sub-section 4.3.3 as follows:

Note: In case of foods in non-retails 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 to be sold. This declaration, in case of foods in non-retail containers, may be made in terms of net or gross contents as required by the country in which the food is intended to be sold.

New proposed Sections 4.9 and 4.10: Insert under Section 4 as follows -

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-

- (i) **List of Ingredients**
- (ii) **Nutritional Information**
- (iii) **List of food additives**
- (iv) **Name and address of the manufacturer or packer**
- (v) **Country of Origin**
- (vi) **Any other information required by the importing Country example including Halal Certification, Kosher Certification, Vegetarian/Non Vegetarian logo etc.**

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.

5. ADDITIONAL MANDATORY REQUIREMENTS: *Insert text in sub-section 5.1 as follows:*

5.1 Quantitative ingredients declaration: (Not applicable to Non-retail Containers)

8. PRESENTATION OF MANDATORY INFORMATION: *Amend as follows-*

8.1 General

- 8.1.1 Labels in prepackaged foods **and non-retail containers** shall be applied in such a manner that they will not become separated from the container.
- 8.1.2 Statements required to appear on the label by virtue of this standard or any other Codex standards shall be clear, prominent, indelible and readily legible under normal conditions of purchase and use.
- 8.1.3 Where the container is covered by a wrapper, the wrapper shall carry the necessary information or the label on the container shall be readily legible through the outer wrapper or not obscured by it.

8.2 Language

- 8.2.1 If the language on the original label is not acceptable, to the consumer for whom it is intended **or in the country of sale**, a supplementary label containing the mandatory information in the required language may be used instead of relabelling.
 - 8.2.2 In the case of either relabelling or a supplementary label, the mandatory information provided shall be fully and accurately reflect that in the original label.
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**CODEX COMMODITY STANDARDS WITH A SECTION ON LABELLING REQUIREMENTS
FOR NON RETAIL CONTAINERS/BULK CONTAINERS**

S. No.	Standard
1.	Standard for Honey (CODEX STAN 12-1981)
2.	Standard for Preserved Tomatoes (CODEX STAN 13-1981)
3.	Standard for Canned Applesauce (CODEX STAN 17-1981)
4.	Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)
5.	Standard for Olive Oils and Olive Pomace Oils (CODEX STAN 33-1981)
6.	Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated (CODEX STAN 36-1981)
7.	Standard for Processed Tomato Concentrates (CODEX STAN 57-1981)
8.	Standard for Canned Pears (CODEX STAN 61-1981)
9.	Standard for Table Olives (CODEX STAN 66-1981)
10.	Standard for Cocoa Butter (CODEX STAN 86-1981)
11.	Standard for Chocolate and Chocolate Products (CODEX STAN 87-1981)
12.	Standard for Corned Beef (CODEX STAN 88-1981)
13.	Standard for Luncheon Meat (CODEX STAN 89-1981)
14.	Standard for Quick Frozen Shrimps or Prawns (CODEX STAN 92-1981)
15.	Standard for Quick Frozen Lobsters (CODEX STAN 95-1981)
16.	Standard for Cooked Cured Ham (CODEX STAN 96-1981)
17.	Standard for Cooked Cured Pork Shoulder (CODEX STAN 97-1981)
18.	Standard for Cooked Cured Chopped Meat (CODEX STAN 98-1981)
19.	Standard for Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars (CODEX STAN 105-1981)
20.	Standard for Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) And Cocoa Cake (CODEX STAN 141-1983)
21.	Standard for Food Grade Salt (CODEX STAN 150-1985)
22.	Standard for Gari (CODEX STAN 151-1989)
23.	Standard for Wheat Flour (CODEX STAN 152-1985)
24.	Standard for Maize (Corn) (CODEX STAN 153-1985)
25.	Standard for Whole Maize (Corn) Meal (CODEX STAN 154-1985)
26.	Standard for Degermed Maize (Corn) Meal and Maize (Corn) Grits (CODEX STAN 155-1985)
27.	Standard for Canned Mangoes (CODEX STAN 159-1987)
28.	Standard for Mango Chutney (CODEX STAN 160-1987)
29.	Standard for Wheat Protein Products Including Wheat Gluten (CODEX STAN 163-1987)
30.	Standard for Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh (CODEX STAN 165-1989)
31.	Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter (CODEX STAN 166 – 1989)

32.	Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CODEX STAN 167 – 1989)
33.	Standard for Whole and Decorticated Pearl Millet Grains (CODEX STAN 169-1989)
34.	Standard for Pearl Millet Flour (CODEX STAN 170-1989)
35.	Standard for Certain Pulses (CODEX STAN 171-1989)
36.	Standard for Sorghum Grains (CODEX STAN 172-1989)
37.	Standard for Sorghum Flour (CODEX STAN 173-1989)
38.	General Standard for Vegetable Protein Products (Vpp) (CODEX STAN 174-1989)
39.	General Standard for Soy Protein Products (CODEX STAN 175-1989)
40.	Standard for Edible Cassava Flour (CODEX STAN 176-1989)
41.	Standard for Desiccated Coconut (CODEX STAN 177-1991)
42.	Standard for Durum Wheat Semolina and Durum Wheat Flour (CODEX STAN 178-1991)
43.	Standard for Pineapples (CODEX STAN 182-1993)
44.	Standard for Papaya (CODEX STAN 183-1993)
45.	Standard for Mangoes (CODEX STAN 184-1993)
46.	Standard for Nopal (CODEX STAN 185-1993)
47.	Standard for Prickly Pear (CODEX STAN 186-1993)
48.	Standard for Carambola (CODEX STAN 187-1993)
49.	Standard for Baby Corn (CODEX STAN 188-1993)
50.	Standard for Dried Shark Fins (CODEX STAN 189-1993)
51.	General Standard for Quick Frozen Fish Fillets (CODEX STAN 190 – 1995)
52.	Standard for Quick Frozen Raw Squid (CODEX STAN 191 – 1995)
53.	Standard for Litchi (CODEX STAN 196-1995)
54.	Standard for Avocado (CODEX STAN 197-1995)
55.	Standard for Rice (CODEX STAN 198-1995)
56.	Standard for Wheat and Durum Wheat (CODEX STAN 199-1995)
57.	Standard for Peanuts (CODEX STAN 200-1995)
58.	Standard for Oats (CODEX STAN 201-1995)
59.	Standard for Couscous (CODEX STAN 202-1995)
60.	Standard for Mangosteens (CODEX STAN 204-1997)
61.	Standard for Bananas (CODEX STAN 205-1997)
62.	Standard for Milk Powders and Cream Powder (CODEX STAN 207-1999)
63.	Group Standard for Cheeses in Brine (CODEX STAN 208-1999)
64.	Standard for Named Vegetable Oils (CODEX STAN 210-1999)
65.	Standard for Named Animal Fats (CODEX STAN 211 -1999)
66.	Standard for Limes (CODEX STAN 213-1999)
67.	Standard for Pummelos (CODEX STAN 214-1999)
68.	Standard for Guavas (CODEX STAN 215-1999)
69.	Standard for Chayotes (CODEX STAN 216-1999)
70.	Standard for Mexican Limes (CODEX STAN 217-1999)

71.	Standard for Ginger (CODEX STAN 218-1999)
72.	Standard for Grapefruits (CODEX STAN 219-1999)
73.	Standard for Longans (CODEX STAN 220-1999)
74.	Group Standard for Unripened Cheese Including Fresh Cheese (CODEX STAN 221-2001)
75.	Standard for Kimchi (CODEX STAN 223-2001)
76.	Standard for Tannia (CODEX STAN 224-2001)
77.	Standard for Asparagus (CODEX STAN 225-2001)
78.	Standard for Cape Gooseberry (CODEX STAN 226-2001)
79.	Standard for Pitahayas (CODEX STAN 237-2003)
80.	Standard for Sweet Cassava (CODEX STAN 238-2003)
81.	Standard for Canned Bamboo Shoots (CODEX STAN 241-2003)
82.	Standard for Canned Stone Fruits (CODEX STAN 242-2003)
83.	Standard for Fermented Milks (CODEX STAN 243-2003)
84.	Standard for Salted Atlantic Herring and Salted Sprat (CODEX STAN 244-2004)
85.	Standard for Oranges (CODEX STAN 245-2004)
86.	Standard for Rambutan (CODEX STAN 246-2005)
87.	General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005)
88.	Standard for Dairy Fat Spreads (CODEX STAN 253-2006)
89.	Standard for Certain Canned Citrus Fruits (CODEX STAN 254-2007)
90.	Standard for Table Grapes (CODEX STAN 255-2007)
91.	Standard for Fat Spreads and Blended Spreads (CODEX STAN 256-2007)
92.	Standard for Pickled Fruits and Vegetables (CODEX STAN 260-2007)
93.	Standard for Mozzarella (CODEX STAN 262-2006)
94.	Standard for Cheddar (CODEX STAN 263-1966)
95.	Standard for Danbo (CODEX STAN 264-1966)
96.	Standard for Edam (CODEX STAN 265-1966)
97.	Standard for Gouda (CODEX STAN 266-1966)
98.	Standard for Havarti (CODEX STAN 267-1966)
99.	Standard for Samsø (CODEX STAN 268-1966)
100.	Standard for Emmental (CODEX STAN 269-1967)
101.	Standard for Tilsiter (CODEX STAN 270-1968)
102.	Standard for Saint-Paulin (CODEX STAN 271-1968)
103.	Standard for Provolone (CODEX STAN 272-1968)
104.	Standard for Cottage Cheese (CODEX STAN 273-1968)
105.	Standard for Coulommiers (CODEX STAN 274-1969)
106.	Standard for Cream Cheese (CODEX STAN 275-1973)
107.	Standard for Camembert (CODEX STAN 276-1973)
108.	Standard for Brie (CODEX STAN 277-1973)
109.	Standard for Butter (CODEX STAN 279-1971)

110.	Standard for Milkfat Products (CODEX STAN 280-1973)
111.	Standard for Evaporated Milks (CODEX STAN 281-1971)
112.	Standard for Sweetened Condensed Milks (CODEX STAN 282-1971)
113.	General Standard for Cheese (CODEX STAN 283-1978)
114.	Standard for Whey Cheeses (CODEX STAN 284-1971)
115.	Standard for Cream and Prepared Creams (CODEX STAN 288-1976)
116.	Standard for Whey Powders (CODEX STAN 289-1995)
117.	Standard for Edible Casein Products (CODEX STAN 290-1995)
118.	Standard for Sturgeon Caviar (CODEX STAN 291 – 2010)
119.	Standard for Live and Raw Bivalve Molluscs (CODEX STAN 292-2008)
120.	Standard for Tomatoes (CODEX STAN 293-2008)
121.	Regional Standard for Gochujang (Asia) (CODEX STAN 294R-2009)
122.	Regional Standard for Ginseng Products (Asia) (CODEX STAN 295R-2009)
123.	Standard for Jams, Jellies and Marmalades (CODEX STAN 296-2009)
124.	Standard for Certain Canned Vegetables (CODEX STAN 297-2009)
125.	Standard for Fermented Soybean Paste (Asia) (CODEX STAN 298R-2009)
126.	Standard for Apples (CODEX STAN 299-2010)
127.	Standard for Bitter Cassava (CODEX STAN 300-2010)
128.	Standard for Edible Sago Flour (Asia) (CODEX STAN 301R-2011)
129.	Standard for Fish Sauce (CODEX STAN 302-2011)
130.	Standard for Tree Tomatoes (CODEX STAN 303-2011)
131.	Regional Standard for Culantro Coyote (LAC) (CODEX STAN 304R - 2011)
132.	Regional Standard for Lucuma (LAC) (CODEX STAN 305R - 2011)
133.	Regional Standard for Chilli Sauce (ASIA) (CODEX STAN 306R-2011)
134.	Standard for Chilli Peppers (CODEX STAN 307-2011)
135.	Standard for Pomegranate (CODEX STAN 310-2013)
136.	Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (CODEX STAN 311 – 2013)
137	Standard for Live Abalone and For Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing (CODEX STAN 312-2013)

CODEX COMMODITY STANDARDS WITH A SECTION ON LABELLING REQUIREMENTS FOR BULK CONTAINERS

1.	Standard for Quick Frozen Peas (CODEX STAN 41-1981)
2.	Standard for Quick Frozen Strawberries (CODEX STAN 52-1981)
3.	Standard for Quick Frozen Raspberries (CODEX STAN 69-1981)
4.	Standard for Quick Frozen Peaches (CODEX STAN 75-1981)
5.	Standard for Quick Frozen Bilberries (CODEX STAN 76-1981)
6.	Standard for Quick Frozen Spinach (CODEX STAN 77-1981)
7.	Standard for Quick Frozen Blueberries (CODEX STAN 103-1981)

8.	Standard for Quick Frozen Leek (CODEX STAN 104-1981)
9.	General Standard for Irradiated Foods (CODEX STAN 106-1983)
10.	Standard for Quick Frozen Broccoli (CODEX STAN 110-1981)
11.	Standard for Quick Frozen Cauliflower (CODEX STAN 111-1981)
12.	Standard for Quick Frozen Brussels Sprouts (CODEX STAN 112-1981)
13.	Standard for Quick Frozen Green Beans and Quick Frozen Wax Beans (CODEX STAN 113-1981)
14.	Standard for Quick Frozen Whole Kernel Corn (CODEX STAN 132-1981)
15.	Standard for Quick Frozen Corn-On-The-Cob (CODEX STAN 133-1981)
16.	Standard for Quick Frozen Carrots (CODEX STAN 140-1983)
17.	Standard for Quick Frozen French Fried Potatoes (CODEX STAN 114-1981)

CODEX TEXTS RELEVANT TO EXPORT - IMPORT REQUIREMENTS

S.no	Recommended Code of Practice (RCP/GL)
1.	Code of Ethics for International Trade in Food including concessional and food aid transactions (CAC/RCP 20-1979)
2.	Guidelines for the Exchange of Information in Food Control Emergency Situations (CAC/GL 19-1995)
3.	Principles for Food Import and Export Certification and Inspection (CAC/GL 20-1995)
4.	Guidelines for Exchange of Information between Countries on Rejections of Imported Foods (CAC/GL 25-1997)
5.	Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997)
6.	Guidelines for the Assessment of the Competence of Testing Laboratories Involved in the Import and Export Control of Foods (CAC/GL 27-1997)
7.	Guidelines for the development of equivalence Agreements Regarding Food Imports and Export Inspection and Certification Systems (CAC/GL 34-1999)
8.	Guidelines for Food Import Control Systems (CAC/GL 47-2003)