

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 10

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

#### Forty-seventh Session

Gatineau, Canada

15 – 19 May 2023

#### Discussion paper on food labelling exemptions in emergencies

(Comments from Burundi, Ghana, South Africa, Thailand, United Republic of Tanzania)

#### Burundi

**Issue:**

- i) consider the key considerations noted in the discussion paper
- ii) consider initiating new work on guidelines on food labelling exemptions in emergencies

**General comment:** Burundi takes note of the need for risk-based decision-making on food labelling exemptions in times of emergency to ensure that there are no disruptions in the food supply chain and will follow the discussions closely.

**Justification:** The General Standard on the Labelling of Prepackaged Foods (CXS 1-1985) and General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021) include mandatory elements, therefore the criteria for exemptions should ensure the consumer is provided with necessary information to make informed decision about the products despite the prevailing emergency situation. This is in line with the Codex mandate of protecting consumer health.

#### Ghana

Ghana acknowledges the importance of flexibilities in emergency situations; however, these flexibilities should not compromise the safety of consumers. It is therefore necessary to conduct risk assessments when granting flexibilities. We look forward to the discussions on the matter.

#### South Africa

**Recommendations:**

The Committee is invited to:

- (i) consider the key considerations noted in this discussion paper.
  - South Africa supports the key considerations noted in the discussion paper.

Rationale: The key considerations in the discussion paper inform the need for future work on food labelling exemptions in emergencies.

(ii) consider initiating new work on guidelines on food labelling exemptions in emergencies (see Project Document in Appendix I).

- South Africa supports the development of new work on guidelines on food labelling exemptions in emergencies.

Rationale:

- Food labelling exemptions in emergencies could assist in ensuring consumers health protection, food safety and adequate food supply during emergencies to ensure fair trade and to prevent food waste.
- Future work is needed to develop a Codex guideline document to provide flexibility around ingredient substitutions and associated labelling changes in emergency situations to maintain availability to the consumer, provided it meets some generic core principles (e.g., no food safety/ allergen concerns; no risk to human health; provides the same function).

### Thailand

Thailand does not object to this new work on labelling exemptions in emergencies. Although we have no experience in labelling exemptions in emergencies, we could see the usefulness of this work for countries to refer to in the future. Nonetheless, we view that the intention of the proposed work is distinct from any exemptions for food donations during emergencies. Therefore, the scope of this work should be clear on this point.

### United Republic of Tanzania

The URT supports the proposal to initiate new work on guidelines on food labelling exemptions in emergencies as elaborated in Appendix I

#### **JUSTIFICATION**

providing this guideline, will enable food supply during emergencies when there is a food crisis.