

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 4, 5, 6, 7, 8, 9 & 11

FL/45 CRD/14
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-fifth Session
Ottawa, Canada, 13-17 May 2019

AGENDA ITEM 2 MATTERS REFERRED TO THE COMMITTEE BY THE CAC AND OTHER CODEX SUBSIDIARY BODIES

Comments from Indonesia

MATTERS FOR ACTION

Committee on Food Hygiene (CCFH50)

Code of Practice on Food Allergen Management for Food Business Operators: allergen labelling

Paragraph 14

Indonesia proposes to open the square bracket and modify this paragraph as follows:

In some instances, it may not be possible to prevent cross-contact, despite the implementation of preventive measures and GHPs, and in such situations, the application of a precautionary allergen statement such as “may contain” is substantiated. However, it may be possible to minimize cross-contact to an extent that the amount of allergen present due to cross-contact is **as low as possible or** below a threshold that could cause an adverse reaction in the majority of consumers allergic to the specific allergen. In these instances, the use of scientifically based threshold levels is a tool to evaluate risk for consumers with food allergies. Threshold levels ~~can~~ **may** be used to reduce precautionary allergen labelling, in turn making precautionary labelling much more meaningful for consumers with food allergies

Paragraph 2.3 Definitions

Indonesia agrees with the proposed definition

Paragraph 72

Indonesia agrees with the proposed definition

Paragraph 152

Indonesia agrees with the proposed definition

Paragraph 160 and 161

Indonesia proposes to delete these paragraphs, the condition for precautionary allergen in paragraph 14 is adequate.

AGENDA ITEM 4 - CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT)

Committee On Cereals, Pulses And Legumes (CCCPL)

Indonesia supports the proposed labelling provision for standard of quinoa

Committee On Food Hygiene

Indonesia agrees with paragraphs 158 and 159.

Committee On Nutrition And Foods For Special Dietary Uses

9.1.3 The sources of protein in the product shall be clearly shown on the label

Indonesia proposes to open the square bracket in bullet a, b, and c.

9.4 Date marking and Storage Instructions

Indonesia proposes to open the square bracket in sub section 9.4.1 (i) regarding the “Best Before Date” or “Best Quality Before Date”

9.5 Information for use

Indonesia proposes to modify the sentence in sub section 9.5.4 as follows:

The directions should be accompanied by a warning ~~and~~ about the health hazards of inappropriate preparation, storage and use

9.6 Additional Labelling Requirements

Indonesia proposes to modify last sentence in sub section 9.6.4 as follows:

9.6.4 Products shall be distinctly labelled in such a way as to avoid any risk of confusion between infant formula, follow-up formula for older infants, (name of product) for young children, and formula for special medical purposes, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them. ~~Cross-promotion between product categories is not permitted on the [label/labelling] of the product~~ **Other product categories (products other than breastmilk substitute) should not cross-promote follow-up formula for older infants on the [label/labelling] of the product.**

AGENDA ITEM 5 PROPOSED DRAFT GUIDANCE FOR THE LABELLING OF NON-RETAIL CONTAINERS (REQUEST FOR COMMENTS THROUGH CL 2019/13-FL)

Indonesia wishes to thank electronic Working Group led by India for preparing the Proposed Guidance for the labelling of non retail containers. The followings are Indonesia comment on proposed draft guidance for the labelling of non retail containers as provided in Appendix 1:

- Indonesia considers that this guidance should be designated as a Guideline.
- Regarding definition of non retail container, Indonesia supports the second definition because it provides more detail and specific definition.
- Indonesia proposes to open the square brackets in sub section 5.2.1
- Regarding section 5.7, Indonesia considers that minimum information which should be presented on the label are the name of the product; net contents; name and address of the manufacturer, packer, distributor, importer, exporter or vendor; lot identification; and date marking.

Rationale :

Those informations should be declared on the label of non retail container in order to avoid mis-identification of the products due to the statement/mark used for identification of non retail container (section 5.5).

- Indonesia proposes to open the square bracket for second bullet in sub section 6.1.

AGENDA ITEM 6 PROPOSED DRAFT GUIDELINES ON FRONT-OF-PACK NUTRITION LABELLING (REQUEST FOR COMMENTS THROUGH CL 2019/14-FL)

Indonesia appreciates the work performed by Costa Rica for preparing proposed draft guidelines on front of pack nutrition labelling. Regarding the recommendation of the eWG, Indonesia would like to provide the following comments on proposed draft guidelines on front of pack nutrition labelling as provided in appendix 1:

2. SCOPE

Indonesia would like to clarify the type of product categories as special dietary uses and special medically purposes which excluded from *Front-of-pack nutrition labelling (FOPNL)* provisions as mentioned in sub section 2.2.

4. GENERAL PRINCIPLES

Sub section 4.2

Indonesia proposes to open the square bracket.

Sub section 4.5

Indonesia considers that the most important thing is that FOPNL should be clearly visible in the package and proposes to delete the proposed words in the square bracket to provide flexibility of inclusion information on the label.

Sub section 4.6

Indonesia proposes to open the square bracket

Sub section 4.7

Indonesia proposes to open the square bracket

Sub section 4.8

Indonesia proposes to open the square bracket

Sub section 4.9

Indonesia proposes to open the square bracket of “government lead but” and delete the word the “government” in the square bracket of as follows:

FOPNL should be ~~[government lead but]~~ developed in collaboration with all interested parties including ~~[government]~~, private sector, consumers, academia, public health associations among others.

Sub section 4.12

Indonesia proposes to use the sentences of “as sold with minimal exceptions” and open the square bracket as follows:

Should be calculated and applied to the food in a manner consistent with the corresponding nutrient declaration for that food such that it represents the nature of the food ~~[as consumed / as sold with minimal exceptions]~~

AGENDA ITEM 7 INTERNET SALES / E-COMMERCE (DISCUSSION PAPER)

Indonesia appreciates the work performed by United Kingdom (UK) for preparing discussion paper on Internet Sales / E-Commerce. Indonesia supports the proposed draft of new work on internet sales/e-commerce. Indonesia would like to provide the following comments to the recommendations of discussion paper:

- 1) Indonesia supports the development of supplementary text which should at least cover aspects as mentioned in the documents. Indonesia would like to propose that responsibility for each parties involved in e-commerce should be included in the scope of discussion paper.
- 2) Indonesia is of the view that loose foods have become international problem, therefore they should be included in the scope of the work on internet sales/e-commerce.

AGENDA ITEM 8 ALLERGEN LABELLING (DISCUSSION PAPER)

Indonesia wishes to thank Australia, the United Kingdom and the United States of America for preparing discussion paper on allergen labelling. Indonesia supports recommendations as provided in the document.

Regarding the issues of “free from” labelling, Indonesia supports that separate work should be undertaken in the future on reviewing the adequacy of existing Codex texts to characterise the technical issues for defining ‘free’ and the need to develop criteria for ‘free from’ allergen labelling.

AGENDA ITEM 9 INNOVATION – USE OF TECHNOLOGY IN FOOD LABELLING (DISCUSSION PAPER)

Indonesia would like to thank Canada for preparing discussion paper on Innovation – Use of Technology in Food Labelling. Indonesia supports possible new work in this area. However, Indonesia considers that the committee should take into account consumer (especially from developing countries) and producer (especially small and medium enterprises) readiness in assessing information or using technology in food labelling.

AGENDA ITEM 11 CRITERIA FOR THE DEFINITION OF “HIGH IN” NUTRITIONAL DESCRIPTORS FOR FATS, SUGARS AND SODIUM (DISCUSSION PAPER)

Indonesia appreciates the work performed by Canada and India for preparing Discussion Paper on Criteria for the Definition of “High In” Nutritional Descriptors for Fats, Sugars and Sodium. Indonesia supports recommendations as provided in the document.

