



## Agenda Item 6

CX/FL 17/44/6  
July 2017

### JOINT FAO/WHO FOOD STANDARDS PROGRAMME

#### CODEX COMMITTEE ON FOOD LABELLING

##### Forty-fourth Session

Asunción, Paraguay 16-20 October 2017

#### PROPOSED DRAFT GUIDANCE FOR THE LABELLING OF NON-RETAIL CONTAINERS OF FOOD

*Prepared by an electronic working group led by India and co-chaired by United States of America and Costa Rica*

Codex members and Observers wishing to submit comments at Step 3 on this draft should do so as instructed in CL2017/71-FL available on the Codex webpage/Circular Letters 2017: <http://www.fao.org/fao-who-codexalimentarius/circular-letters/en/>. Comments will only be accepted through the online commenting system within the deadline indicated in the CL 2017/71-FL

## I. INTRODUCTION

1. At the 41<sup>st</sup> 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'. CCFL41 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. India prepared a discussion paper for consideration by CCFL42 (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 item could not be discussed in the plenary owing to lack of time.
3. Based on the informal inputs from delegations during CCFL42, it was proposed to develop the guidance through a limited revision of the *General Standard for Labelling of Prepackaged Foods* (CODEX STAN 1-1985) (GSLPF). Accordingly a revised discussion paper along with project document and draft proposed text to provide guidance for labelling of non-retail containers of food was prepared and presented to CCLF43 (May 2016).
4. With strong support for the new work confirmed, the Committee proceeded to examine the Project Document and:
  - i) Amended the title, section 1 (scope) and section 3 (main aspects to be covered) to provide for development of outcome based guidelines that would be broad enough to enable stakeholders to take advantage of innovative approaches/practices;
  - ii) Agreed to decide on the location of the guidelines (either as a stand-alone document or otherwise) at a future date when the work had progressed;
  - iii) Clarified that the current definition for the term "labelling" in CODEX STAN 1 -1985 was broad enough to allow for innovative approaches/practices other than providing information on labels only.
5. The CCFL43 (May 2016) agreed to start new work and to establish an EWG chaired by India and co-chaired by the United States of America, working in English only, to develop a proposed draft guidance for the labelling of non-retail containers of foods for comments at Step 3 and consideration at the next session of the Committee. (REP/16 FL, Para 54).

6. CAC39 approved the new work and also agreed that Costa Rica may co-host with India and United States of America (REP/16 CAC, Para 111 and Appendix VI).

## II. SUMMARY OF THE PROCESS OF THE EWG

7. 24 member countries, 1 member organization and 12 observer organizations nominated themselves to participate in the work of this EWG. The list of participants of the EWG is provided in the Appendix II.

8. The EWG worked through two rounds of consultation with substantive comments received in each round.

9. The EWG began its work by circulating the first draft of the proposed guidance on the labelling of non-retail containers of foods in December 2016.

10. In response to the first draft circulated, comments were received from 16 member countries, 1 member organization and 7 observer organizations<sup>1</sup>. The draft document was amended based on the comments received and the second draft of the document thus prepared was circulated for comments in April 2017. A summary of comments which were examined but not incorporated was also attached along with the relevant justifications.

11. In response to the second draft circulated, comments were received from 10 member countries, 1 member organization and 5 observer organizations<sup>2</sup>. Based on these comments, the draft has been amended and is provided in the Appendix I.

## III. MAJOR DISCUSSION POINTS IN THE ELECTRONIC WORKING GROUP

12. The following main issues/areas were discussed:

- i) Definitions: Whether to reproduce all the definitions from the GSLPF that are relevant to this document or to make reference to the GSLPF? Members seemed to be favouring a reference to the GSLPF for relevant definitions. Hence, the current draft includes a reference to the GSLPF and defines only two new terms – ‘Business’ and ‘Non-retail container’ – that are used in this document and the definitions for which are not provided in the GSLPF.
- ii) Whether to explicitly mention that “foods for catering purposes” were excluded from the scope of this guidance? Many members were of the view that since “foods for catering purposes” is already in the scope of the GSLPF, it should be out of the scope of this document. It was clarified to the members that as the term “prepackaged” covered “foods for catering purposes”, the guidance for labelling the same was not the subject matter of this document and that the proposed definition of the term ‘non-retail container’ made this clear (business-to-business sale/not for direct sale to consumer). Hence, an explicit mention of the same was not necessary.
- iii) A reference to the General Principles in the GSLPF has been retained as these Principles are non-negotiable and can be applied to the non-retail containers as well. Drafting new text may have led to new concerns or suggestions that may not have been amenable to discussions in an EWG. A proper qualifier (e.g. *mutatis mutandis*) needs to be identified to make a reference to these Principles.
- iv) Sections 4.2 and 4.5: It appeared from the comments of some members that the aspects addressed by these two paragraphs were being mixed up and understood as mere duplication. However, these two are different in the sense that we need to differentiate between retail containers (meant for direct sale to consumers) and non-retail containers of foods as well as between labelling provisions of a retail container from labelling provisions of a non-retail container of foods. These paragraphs have now been merged together as suggested by some members.

---

<sup>1</sup> Argentina, Belgium, Brazil, Canada, Costa Rica, Cuba, Chile, Dominican Republic, EU, India, Indonesia, Malaysia, New Zealand, Peru, Singapore, Thailand, USA, Food Drink Europe, International Council of Beverages Association, International Chewing Gum Association, International Council of Grocery Manufacturer Associations, International Dairy Federation, International Fruit and Vegetable Juice Association and World Processing Tomato Council.

<sup>2</sup> Argentina, Chile, Costa Rica, Dominican Republic, EU, India, Malaysia, New Zealand, Peru, Thailand, USA, Food Drink Europe, International Council of Beverages Association, International Council of Grocery Manufacturer Associations, International Dairy Federation, and International Fruit and Vegetable Juice Association.

- v) One observer organization expressed concern regarding provisions for labelling of non-retail containers of foods which are already part of a separate Codex text. It was clarified that once this guidance is finalized, it is expected to be the primary source of guidance for labelling of non-retail containers of food and the commodity standards may retain only specific provisions on labelling of non-retail containers which may not be addressed by this guidance and/or is very specific to a commodity. It may also be noted that this guidance seeks in its current stage much more information on label of a non-retail container than that mentioned in the Codex Procedural Manual and consequently in those commodity standard that have a section on labelling of non-retail containers. This, therefore, will be a question to the CCFL to be addressed at a later stage.
- vi) Information requirements on label: Name of food, allergenicity information, net contents, lot identification, date marking, statement to identify a non-retail container and name/address of manufacturer seem to be generally acceptable by the members as necessary information on the label. Currently, the draft provides for an identification mark to replace all this information on the label, except the name of food, allergenicity information and the statement to identify a non-retail container. There was also a suggestion to include 'Country of origin' in the information required on the label, which may be discussed further.
- vii) Information requirements by means other than label: Several members were of the view that the name and address of manufacturer, information regarding foods and ingredients known to cause hypersensitivity, and special storage conditions should appear on label rather than in accompanying documents, in case of non-retail containers. While recognizing that the information required on the label should be kept at minimum, the current draft requires these information on the label.
- viii) Date marking: - Most of the members were of the view that this section will need to be consistent with the 'date marking' section of the GSLPF and suggested to keep the Section in square brackets since it is still under discussion in the CCFL. Therefore this Section has been put in square brackets to facilitate further discussions. The text has been amended to take into account the amendment proposed by CCFH48 (November 2016).
- ix) It was suggested that the "Statement for identification of a non-retail container" may be optional since many non-retail containers do not run the risk of being confused with retail packages. A provision was included to address such situations.
- x) Reference to innovative practices of providing information was contested by some members citing it was not clear enough. The text was included in the Project Document submitted to and approved by the CAC and this was so, on the basis of then comments from member countries. The text aims at accommodating newer means of information sharing that may become feasible in future. Hence, the text has been retained with modifications to mention it as 'globally accepted innovative practices'.
- xi) In addition to the issues identified above the EWG members through the first draft circulation were asked whether this guidance be a stand-alone document or be inserted within the General Standard for the Labelling of Prepackaged Foods. 13 of the 22 members who responded to the question supported these guidelines to be a stand-alone document. The remaining 9 suggested it to be appended to the GSLPF.
- xii) There were also several suggestions to name the document as 'Guidelines'. As the status of the text being developed will be determined by the Committee at a later stage, the relevant text is retained in square brackets for further discussions in the Plenary.

#### IV. CONCLUSION AND RECOMMENDATIONS

13. Proposed draft guidance text has been developed with the help of interested participants.

14. The Committee is invited to:

- i) consider the proposed draft guidance as provided in **Appendix I**, with a view to progress it through the Codex step procedure;
- ii) discuss if information sought in provisions 5.1.1.4 (coined fanciful name etc.), 5.1.2 (processing/treatment information), and the 'within 24 hour use' criteria for exemption to date marking are required on the label of a non-retail container or can be done away with or can be accepted in the accompanying documents; and,
- iii) deliberate how to best address the relationship between the guidance being developed and the provisions on labelling of non-retail containers/bulk packs included in the commodity standards (Refer CX/FL 16/43/6, Annex 3 for a list of these commodity standards).

- 
- iv) decide whether this guidance be a stand-alone document or should be inserted within the *General Standard for the Labelling of Prepackaged Foods*.

## APPENDIX I

## PROPOSED DRAFT GUIDANCE FOR THE LABELLING OF NON-RETAIL CONTAINERS OF FOODS

(for comments at Step 3 through <https://ocs.codexalimentarius.org>)

1. **SCOPE:** [These Guidelines] / [This Standard][apply] /[applies] to the labelling of non-retail containers of food not intended to be sold directly to the consumer<sup>3</sup>, including the information provided in the accompanying physical/digital documents or by other means, and the presentation thereof.
2. **PURPOSE:** The purpose of [these Guidelines] / [this Standard] is to facilitate appropriate harmonized labelling requirements for non-retail containers of food, with an intention to avoid hindrance to international trade of such containers and promote fair trade practices. [These Guidelines] / [This Standard] outline what information must be on the label and what information, while not required on the label, must be provided with a non-retail container. [The document will guide the national competent authorities in laying down appropriate labelling requirements for non-retail containers of foods and the manner in which the relevant information is made available].
3. **DEFINITION OF TERMS:** For the purpose of [these Guidelines] / [this Standard], the relevant definitions in the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) apply. In addition, the following terms have the meaning as defined below:

*“Business”* means any undertaking carrying out any of the activities related to any stage of production, processing, packaging and distribution (including trade) of food<sup>3</sup>.

*“Non-retail container”*: means any container<sup>3</sup> that is not intended to be offered for direct sale to consumer<sup>3</sup>. The food<sup>3</sup> in such containers is of same kind, prepackaged<sup>3</sup> or not, and intended for further business operations or processing activities.
4. **GENERAL PRINCIPLES:** The following general principles apply in respect of non-retail containers:
  - 4.1 The general principles established in the General Standard for the Labelling of Prepackaged foods (GSLPF) apply [*mutatis mutandis*] / [equally as appropriate] to the labelling of non-retail containers of foods.
  - 4.2 Both the labelling requirements and non-retail containers of foods itself should be differentiated clearly from the labelling requirements and containers for prepackaged<sup>3</sup> foods respectively.
  - 4.3 The label along with the accompanying documents of non-retail containers provide relevant information that enable compliant labelling of food intended for sale to consumer.
  - 4.4 The labelling requirements for non-retail containers should be established taking into account the information requirements and implementation capabilities of the relevant stakeholders (business and competent authorities).
  - 4.5 Where appropriate, the information requirements in respect of non-retail containers of food may be met through appropriate means other than on a label (including accompanying documents or other globally acceptable innovative practices, for example, electronic transfer of information), as allowed for by the competent authority in the country in which it is sold.
5. **INFORMATION REQUIREMENTS ON LABEL:** The following minimum mandatory information shall appear on the label of non-retail containers of food:
  - 5.1 **The name of the food**
    - 5.1.1 The name shall indicate the true nature of the food and normally be specific and not generic.
      - 5.1.1.1 Where a name or names have been established for a food in a Codex standard, at least one of these names shall be used.
      - 5.1.1.2 In other cases, the name prescribed by national legislation shall be used.
      - 5.1.1.3 In the absence of any such prescribed name, either a common or usual name existing by common usage as an appropriate descriptive term which is not misleading or confusing in the country in which the food is intended to be sold shall be used.
      - 5.1.1.4 A “coined”, “fanciful”, “brand” name or “trade mark” may be used provided it accompanies one of the names provided in Subsections 5.1.1.1 to 5.1.1.3.

---

<sup>3</sup> As defined in the *General Standard for the Labelling of Pre-packaged Foods* (CODEX STAN 1-1985)

5.1.2 There shall appear on the label either in conjunction with, or in close proximity to, the name of the food, specific information related to processing or treatment it has undergone; for example: dried, concentrated, reconstituted, smoked.

## 5.2 Allergenic Foods<sup>4</sup>

### 5.3 Net Contents:

5.3.1 The net<sup>5</sup> contents should be declared in either the metric system (The International System of Units, SI) or avoirdupois weight system or both the systems of measurement as required by the competent authority in the country in which the food is intended to be sold. This declaration shall be made in the following manner:

- (a) for liquid foods, by volume or weight;
- (b) for solid foods, by weight;
- (c) for semi-solid or viscous foods, either by weight or volume;

### 5.4 Lot identification

5.4.1 The container should provide marking sufficient to identify production lot and, if not included in the lot marking, production site.

### 5.5 Date Marking<sup>4</sup>

5.5.1 [If not otherwise determined in an individual Codex standard, the following date marking shall apply, unless clause 5.5.1 (vii) applies:

- (i) When a food must be consumed/utilized before a certain date to ensure its safety and quality the "Use-by Date" or "Expiration Date" shall be declared<sup>4</sup>.
- (ii) Where a "Use-by Date" or "Expiration Date" is not required, the "Best-Before Date" or "Best Quality Before Date" shall be declared<sup>6</sup>.
- (iii) The date marking should be as follows:
  - On products with a durability of not more than three months; the day and month shall be declared and in addition, the year when competent authorities mandate it.
  - On products with a durability of more than three months at least the month and year shall be declared.
- (iv) The date shall be introduced by the words:
  - "Use-by <insert date>" or "Expiration Date <insert date>" or "Best before <insert date>" or "Best Quality Before <insert date>" as applicable where the day is indicated; or
  - "Use-by end <insert date>" or "expiration date <insert date>" or "Best before <insert date>"; or "Best Quality Before <insert date>" as applicable in other cases.
- (v) The words referred to in paragraph (iv) shall be accompanied by:
  - either the date itself; or
  - a reference to where the date is given.
- (vi) The day and year shall be declared by uncoded numbers with the year to be denoted by 2 or 4 digits, and the month shall be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the competent authority should determine whether to require the sequence of the day, month, year, be given by appropriate abbreviations accompanying the date mark (e.g. DD/MM/YYYY or YYYY/DD/MM).
- (vii) Notwithstanding 5.5.1 (i) and 5.5.1 (ii), a date mark shall not be required for a food if one or more of the following criteria apply:

<sup>4</sup> Information to be provided as per the guidance in the relevant section of the *General Standard for the Labelling of Pre-packaged Foods* (CODEX STAN 1-1985)

<sup>5</sup> The declaration of net contents represents the quantity at the time of packaging and is subject to enforcement by reference to an average system of quantity control.

<sup>6</sup> Consideration should be given to other Codex texts

1. Where safety is not compromised and quality does not deteriorate because of the preservative nature of the food is such that it cannot support microbial growth (e.g. alcohol, salt, acidity, low water activity) under stated storage conditions;
2. Where deterioration is evident to the purchaser;
3. Where the key/organoleptic quality aspects of the food are not lost;
4. Where the food is intended to be consumed within 24 hours of its manufacture.

For example, foods such as:

- fresh fruits and vegetables, including tubers, which have not been peeled, cut or similarly treated;
- wines, liqueur wines, sparkling wines, aromatized wines, fruit wines and sparkling fruit wines;
- alcoholic beverages containing at least 10% alcohol by volume;
- bakers' or pastry-cooks' wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture;
- vinegar;
- non-iodized food grade salt;
- non-fortified solid sugars;
- confectionery products consisting of flavoured and/or coloured sugars;
- chewing gum.

In such cases, the "Date of Manufacture" or the "Date of Packaging" may be provided.

- (viii) A "Date of Manufacture" or a "Date of Packaging" may be used in combination with 5.5.1 (i) or (ii). It shall be introduced with the words "Date of Manufacture" or "Date of Packaging", as appropriate, and use the format provided in clause 5.5.1 (vi).

- 5.5.2 Any special conditions for the storage of the food where they are required to support the integrity of the food and, where a date mark is used, the validity of the date depends thereon]

## 5.6 Statement for identification of a non-retail container

The non-retail containers of foods shall bear a statement to indicate that the food is not intended to be sold directly to consumer or to clearly identify it as a non-retail container unless Section 6.2 applies. Examples of such statements are:

"NOT FOR CONSUMER SALE"

"NON-RETAILCONTAINER - NOT FORDIRECT SALE TO CONSUMER"

"NOT FOR DIRECT SALE TO CONSUMER".

- 5.7 Name and address of the manufacturer packer, distributor, importer, exporter or vendor of the food etc. (Approval number of establishments, where applicable).
- 5.8 Notwithstanding the above in the present Section on Information Requirements on Label and if permitted by the competent authority in the country in which it is sold, an identification mark may replace the information on the label except the name of the product (Section 5.1), ingredients of hypersensitivity (Section 5.2) and the statement that it is a non-retail container (Section 5.6), provided such mark is clearly identifiable with the accompanying documents or other means of information exchange where all such information shall be provided.

## 6. INFORMATION REQUIREMENTS BY MEANS OTHER THAN LABEL

- 6.1 The following additional mandatory information, if not provided on the label, shall be provided in the accompanying documents or through appropriate other means (e.g. electronically between businesses), provided such documents or information is effectively traceable to the food in non-retail container:
- List of Ingredients<sup>4</sup>
  - Irradiated Foods-A written statement indicating that the food or its ingredient, as the case may be has been treated with ionizing radiation.

- Information necessary to meet mandatory labelling requirements for pre-packaged foods in which the food in non-retail container will be used or packaged. E.g. Country of origin<sup>4</sup>, nutrition information etc.
- [Any other information required by the importing country such as Halal Certification, Kosher Certification, Vegetarian/Non Vegetarian logo etc.]

**6.2** In case of loose/unpackaged food in tankers, barges or similar containers that are not amenable to possess a label, and are not likely to be confused with the containers for direct sale to consumers, the labelling information may be exclusively provided in the accompanying documents or exchanged through other means as agreed among the competent authorities, provided the identity of such containers is unambiguously traceable in the accompanying documents.

**6.3 Other information:** Additional information may be exchanged through supporting documents or means other than labelling of the non-retail container (e.g. electronically between businesses).

## **7. PRESENTATION OF INFORMATION:**

### **7.1 General**

7.1.1 Labels on non-retail containers of foods shall be applied in such a manner that they will not become separated from the container.

7.1.2 Statements required to appear on the label by virtue of [these Guidelines] / [this Standard] or any other Codex Standards shall be clear, prominent, indelible and readily legible.

7.1.3 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.

7.1.4 The name of the food (Section 5.1), the statement of identification of non-retail container (Section 5.6) and the identification mark (Section 5.8), where used, shall appear in a prominent position and in the same field of vision.

### **7.2 Language**

7.2.1 If the language in the original labelling is not acceptable to the competent authority in the country in which the product is sold, an official translation of the information in the labelling should be provided in the required language in the form of re-labelling, supplementary label and/or in the accompanying documents, if it meets the requirements of the country in which the product is sold.

7.2.2 The information provided through translation in the required language shall fully and accurately reflect that in the original labelling.



## APPENDIX II

**List of Participants****Members**

Country Name	Name of participant	Title & Position	Email
Argentina	Ms Maria Celina Moreno	Ministry of Agroindustry	<a href="mailto:celmor@magyp.gob.ar">celmor@magyp.gob.ar</a>
	CCP Argentina	CCP Argentina	<a href="mailto:codex@magyp.gob.ar">codex@magyp.gob.ar</a>
Belgium	M. Luc Ogiers	Counsellor, Federal Public Service Economy, S.M.E.'s, Self employed and Energy	<a href="mailto:luc.ogiers@economie.fgov.be">luc.ogiers@economie.fgov.be</a>
Brazil	Rodrigo Martins de Vargas	Specialist on Regulation and Health Surveillance	<a href="mailto:rodrigo.vargas@anvisa.gov.br">rodrigo.vargas@anvisa.gov.br</a>
Canada	Ms. Kathy Twardek	Director, Consumer Protection and Market Fairness Division, Canadian Food Inspection Agency	<a href="mailto:kathy.twardek@inspection.gc.ca">kathy.twardek@inspection.gc.ca</a>
	Ms. Marie-Claire Hurteau	Senior Program Officer, Consumer Protection and Market Fairness Division Canadian Food Inspection Agency	<a href="mailto:marie-claire.hurteau@inspection.gc.ca">marie-claire.hurteau@inspection.gc.ca</a>
Chile	Emilio Matas	Coordinador Nacional del Comité del CCFL, Servicio Nacional del Consumidor (SERNAC), Ministerio de Economía.	<a href="mailto:ematas@sernac.cl">ematas@sernac.cl</a>
China	Ms. ZHANG Zhe (Jessica)	China National Center for Food Safety Risk Assessment	<a href="mailto:zhangzhe@cfsa.net.cn">zhangzhe@cfsa.net.cn</a>
	Ms. DING Hao (Claire)	China National Center for Food Safety Risk Assessment	<a href="mailto:dinghao@cfsa.net.cn">dinghao@cfsa.net.cn</a>
Costa Rica	Ms Tatiana Cruz Ramirez	Jefe Depto, Reglamentacion Tecnica y Codex Direccion de Calidad, Ministerio de Economia, Industria y Comercio.	<a href="mailto:tcruz@meic.go.cr">tcruz@meic.go.cr</a>
Cuba	Ms. Marileydy Herrera Olmo	Director of Quality and Technology of the Ministry of Food Industry	<a href="mailto:Marileydy.herrera@minal.gob.cu">Marileydy.herrera@minal.gob.cu</a>
Ecuador	Tatiana Graciela Gallegos Vaca	Food engineer, Ing. en Alimentos(Food Engineer)	<a href="mailto:tatiana.gallegos@msp.gob.ec">tatiana.gallegos@msp.gob.ec</a>
	Verónica Alexandra Granda Paz	Biotechnology Engineer, Ing. en Biotecnología (Biotechnology Engineer)	<a href="mailto:vgranda@normalizacion.gob.ec">vgranda@normalizacion.gob.ec</a>

Country Name	Name of participant	Title & Position	Email
Estonia	Mrs Annika Leis	Chief specialist of the General Food Law Bureau of the Food Safety Department Ministry of Rural Affairs ESTONIA	<a href="mailto:annika.leis@agri.ee">annika.leis@agri.ee</a>
	Mrs Külli Johanson	Chief specialist of the General Food Law Bureau of the Food Safety Department Ministry of Rural Affairs ESTONIA	<a href="mailto:kylli.johanson@agri.ee">kylli.johanson@agri.ee</a>
European Union	Athanasios Raikos	Policy Officer in the area of food information to consumers, European Commission	<a href="mailto:Athanasios.RAIKOS@ec.europa.eu">Athanasios.RAIKOS@ec.europa.eu</a>
	Anastasia Alvizou	Policy Officer in the area of General Food Law and Food information to consumers, European Commission	<a href="mailto:Anastasia.ALVIZOU@ec.europa.eu">Anastasia.ALVIZOU@ec.europa.eu</a>
	European Union Codex Contact Point	European Union Codex Contact Point	<a href="mailto:Sante-Codex@ec.europa.eu">Sante-Codex@ec.europa.eu</a>
Ghana	Mrs. Isabella Mansa Agra	Acting Deputy Chief Executive, Food Inspectorate Division, Food and Drugs Authority	<a href="mailto:isabella.agra@fdaghana.gov.gh">isabella.agra@fdaghana.gov.gh</a>
	Ms. Pokuaa Appiah-Kusi	Deputy Codex Contact Manager, Ghana Standards Authority	<a href="mailto:codex@gsa.gov.gh">codex@gsa.gov.gh</a>
			<a href="mailto:codexghana@gmail.com">codexghana@gmail.com</a>
India	Dr D K Sharma	Dy. General Manager (QA & PPD), National Dairy Development Board (NDDB)	<a href="mailto:dksharma@nddb.coop">dksharma@nddb.coop</a>
	Mr P Karthikeyan	Assistant Director (Codex & Regulations), Food Safety & Standards Authority of India	<a href="mailto:Codex-india@nic.in">Codex-india@nic.in</a>
	Ms Seema Shukla	Assistant Director, Export Inspection Council of India	<a href="mailto:tech9@eicindia.gov.in">tech9@eicindia.gov.in</a>
	Jasvir Singh	Head Scientific affairs and Regulatory Affairs, Mondelez India Foods Limited	<a href="mailto:Jasvir.singh@mdlz.com">Jasvir.singh@mdlz.com</a>
	Ms. Parna Dasgupta	Director Regulatory and Government Affairs, Kellogg India Pvt Ltd	<a href="mailto:parna.dasgupta@kellogg.com">parna.dasgupta@kellogg.com</a>
	Ms. S. Nagavalli	Scientist C, Food and Agriculture Department of Bureau of Indian Standards	<a href="mailto:snagavalli@bis.gov.in">snagavalli@bis.gov.in</a>
Indonesia	Elin Herlina (Mrs.)	Director of Food Product Standardization, National Agency of Drug and Food Control, Republic of Indonesia	<a href="mailto:codexbpom@yahoo.com">codexbpom@yahoo.com</a>
Malaysia	Ms Nur Liyana bt Mohamad Nizar	Assistant Director Food Safety and Quality Division, Ministry of Health Malaysia	<a href="mailto:nurliyana@moh.gov.my">nurliyana@moh.gov.my</a>
	Codex contact point Malaysia	Contact Point Malaysia	<a href="mailto:ccp_malaysia@moh.gov.my">ccp_malaysia@moh.gov.my</a>

Country Name	Name of participant	Title & Position	Email
Netherlands	Stoelhorst, H.G. (Inge)	Policy coordinator, Ministry of Health, Welfare and Sport	<a href="mailto:i.stoelhorst@minvws.nl">i.stoelhorst@minvws.nl</a>
New Zealand	Phillippa Hawthorne	Senior Adviser Food Science	<a href="mailto:Phillippa.Hawthorne@mpi.govt.nz">Phillippa.Hawthorne@mpi.govt.nz</a>
Peru	Rudy Campos		<a href="mailto:rudy.campos@pe.nestle.com">rudy.campos@pe.nestle.com</a>
	Ely Su Palacios		<a href="mailto:ely_palacios@lim.ajinomoto.com">ely_palacios@lim.ajinomoto.com</a>
Poland	Ms Joanna Markowska	Main expert Department of Agricultural Markets Ministry of Agriculture and Rural Development	<a href="mailto:Joanna.Markowska@minrol.gov.pl">Joanna.Markowska@minrol.gov.pl</a>
	Codex Contact Point	CCP Poland	<a href="mailto:kodeks@ijhars.gov.pl">kodeks@ijhars.gov.pl</a>
República Dominicana	Dra. Fátima del Rosario Cabrera T.	Encargada del Departamento de Alimentos Dirección General de Medicamentos, Alimentos y Productos Sanitarios (DIGEMAPS), Ministerio de Salud Pública y Asistencia Social (MSP).	<a href="mailto:fatima.cabrera@msp.gob.do">fatima.cabrera@msp.gob.do</a>
Singapore	Ms Seah Peik Ching	Deputy Director, Regulatory Programmes Department	<a href="mailto:Seah_peik_ching@ava.gov.sg">Seah_peik_ching@ava.gov.sg</a>
	Ms Neo Mui Lee	Senior Manager, Regulatory Programmes Department	<a href="mailto:Neo_mui_lee@ava.gov.sg">Neo_mui_lee@ava.gov.sg</a>
Spain	Agustín Palma Barriga	Área de Gestión de Riesgos Nutricionales Subdirección General de Promoción de la Seguridad Alimentaria Agencia Española de Consumo, Seguridad Alimentaria y Nutrición	<a href="mailto:apalma@msssi.es">apalma@msssi.es</a>
Thailand	Ms. Chutima Sornsumrarn	Standards Officer, National Bureau of Agricultural Commodity and Food Standards	<a href="mailto:acfs.chu@gmail.com">acfs.chu@gmail.com</a>
	Ms. Dawisa Paiboonsiri	Standards Officer, National Bureau of Agricultural Commodity and Food Standards	<a href="mailto:dawisa.p@gmail.com">dawisa.p@gmail.com</a>
UK	Ms Pendi Najran	Defra Labelling & Standards Team	<a href="mailto:pendi.najran@defra.gsi.gov.uk">pendi.najran@defra.gsi.gov.uk</a>
	Mr Robert Wells	Defra Labelling & Standards Team	<a href="mailto:robert.wells@defra.gsi.gov.uk">robert.wells@defra.gsi.gov.uk</a>
USA	Ms Felicia Billingslea	Director, Food Labeling and Standards Division, U.S. Food and Drug Administration	<a href="mailto:Felicia.Billingslea@fda.hhs.gov">Felicia.Billingslea@fda.hhs.gov</a>

### Observer Organizations

Organization Name	Name of participant	Title & Position	Email
Comité Européen des Fabricants de Sucre (CEFS)	Céline Benini	Scientific & Regulatory Affairs Adviser, CEFS (Comité Européen des Fabricants de Sucre)	<a href="mailto:celine.benini@cefs.org">celine.benini@cefs.org</a>
Food Drink Europe	Dirk Jacobs	Deputy Director General / Director Consumer Information, Diet and Health	<a href="mailto:d.jacobs@fooddrinkeurope.eu">d.jacobs@fooddrinkeurope.eu</a>
International Chewing Gum Association (IGCA)	Christophe Leprêtre	Executive Director, Regulatory and Scientific Affairs, ICGA	<a href="mailto:icga@gumassociation.org">icga@gumassociation.org</a> <a href="mailto:lepretre@gumassociation.org">lepretre@gumassociation.org</a>
International Council of Grocery Manufacturers Association (ICGMA)	Kimberly Wingfield	Director, Science Policy, Labeling and Standards	<a href="mailto:kwingfield@gmaonline.org">kwingfield@gmaonline.org</a>
International Dairy Federation	Ms Laurence Rycken	Technical Manager	<a href="mailto:lrycken@fil-idf.org">lrycken@fil-idf.org</a>
International Food Policy Research Institute (IFPRI)	Anne MacKenzie	Head of Standards & Regulatory Issues	<a href="mailto:a.amackenzie@cgiar.org">a.amackenzie@cgiar.org</a>
International Fruit and Vegetable Juice Association	John Collins	Executive Director, International Fruit and Vegetable Juice Association	<a href="mailto:john@ifu-fruitjuice.com">john@ifu-fruitjuice.com</a>
International Nut and Dried Fruit Council, Spain	Dr. Ana Bermejo	Food Safety and Law Specialist, International Nut and Dried Fruit Council	<a href="mailto:ana.bermejo@nutfruit.org">ana.bermejo@nutfruit.org</a>
	Ms. Irene Gironès	Scientific and Technical Projects Manager, International Nut and Dried Fruit Council	<a href="mailto:irene.girones@nutfruit.org">irene.girones@nutfruit.org</a>
The Food Industry Asia (FIA)	Ms. Jiang YiFan	Regional Regulatory Affairs Manager, The Food Industry Asia (FIA)	<a href="mailto:codex@foodindustry.asia">codex@foodindustry.asia</a>
The Institute of Food Technologists (IFT)	Robert Conover	FT Codex Subject Expert and IFT representative to the Codex Committee on Food Labeling	<a href="mailto:rconover@kikkoman.com">rconover@kikkoman.com</a>
The International Council of Beverages Associations (ICBA), Canada	Ms. Paivi Julkunen	Position: Chair, ICBA Committee for Codex Organization: ICBA	<a href="mailto:pjulkunen@coca-cola.com">pjulkunen@coca-cola.com</a>
World Processing Tomato Council (WPTC)	Luca Sandei	Chair of the WPTC Commission on International Legislation SSICA Parma (Italy), Head of Tomato Dept.	<a href="mailto:luca.sandei@ssica.it">luca.sandei@ssica.it</a>
	Sophie Colvine	WPTC General Secretary WPTC, Montoux (France)	<a href="mailto:colvine@tomate.org">colvine@tomate.org</a>