

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

CL 2019/86-FL  
December 2019

**TO** Codex Contact Points  
Contact Points of international organizations having observer status with Codex

**FROM** Secretariat, Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme

**SUBJECT** **REQUEST FOR COMMENTS ON LABELLING OF ALCOHOLIC BEVERAGES**

**DEADLINE** **31 August 2020**

## COMMENTS

### To

Federal Service for Surveillance on  
Consumer Rights Protection and  
Human Wellbeing (Rosпотребнадзор)  
E-mail: [codex@gsen.ru](mailto:codex@gsen.ru)

### Copy to

Secretariat  
Codex Alimentarius Commission  
Joint FAO/WHO Food Standards Programme  
FAO  
Viale delle Terme di Caracalla  
00153 Rome, Italy  
E-mail: [codex@fao.org](mailto:codex@fao.org)

## BACKGROUND

1. The 45<sup>th</sup> Session of the Codex Committee on Food Labelling (CCFL45) discussed the discussion paper on labelling of alcoholic beverages and agreed:
  - a) to issue a Circular Letter (CL) requesting comments on the discussion paper (CX/FL 19/45/10); and that.
  - b) the Russian Federation, European Union and India would prepare a further discussion paper based on comments received to the CL, comments made at CCFL45, written comments in CRDs submitted to CCFL45 and the clarification made by the Codex Secretariat in paragraphs 98 – 99, for consideration by CCFL46.<sup>1</sup>
2. In order to facilitate submission of comments and further elaboration of the discussion paper for consideration by CCFL46, the following background information is presented below.

### ***Whether alcoholic beverages fall under the Codex definition of food as it is stated in the Procedural Manual and the Codex General Standard for the Labelling of Prepackaged Foods***

3. The Codex definition of food as it is stated in the Procedural Manual and the *General Standard for the Labelling of Prepackaged Food* provides that «Food means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drinks, chewing gum and any substance which has been used in manufacture, preparation or treatment of «food» but does not include cosmetics or tobacco or substances used only as drugs». However, discussions on labelling of alcoholic beverages that was presented at CCFL45 showed that there was not common understanding among countries whether or not alcoholic beverages fall under this definition.

### ***The recommendations provided in the discussion paper presented at CCFL45 (CX/FL 19/45/10) and the rationale for their support to one or several of the recommendations therein***

4. CX/FL 19/45/10<sup>2</sup> identified the following recommendations:

#### **Recommendation 1**

To initiate new work on a new Codex standard on labelling of alcoholic beverages.

#### **Recommendation 2**

To initiate new work to provide clarity in the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) on their applicability to alcoholic beverages and to consider revisions of these two codex texts in terms of labelling of alcohol content and nutritional information, including energy value of alcoholic beverages.

<sup>1</sup> REP19/FL, para 117. Full discussion on this topic is in paras 107 - 116

<sup>2</sup> The report of CCFL45 (REP19/FL) and working documents including CX/FL 19/45/10 can be found on the Codex website dedicated to CCFL: <http://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCFL&session=45>

**Recommendation 3**

To initiate new work to provide clarity in the existing General Standard for the Labelling of Prepackaged Foods (CXS1-1985) and the Guidelines on Nutrition Labelling (CXG2-1985) on their applicability to alcoholic beverages and to consider revisions of these two codex texts in terms of labelling of alcohol content of alcoholic beverages.

**Recommendation 4**

To initiate new work to provide clarity in the existing General Standard for the Labelling of Prepackaged Foods (CXS1-1985) and the Guidelines on Nutrition Labelling (CXG2-1985) on their applicability to alcoholic beverages.

**Recommendation 5**

Not to initiate new work related to the labelling of alcoholic beverages.

5. A simplified decision tree can be found in the Annex which may be used to facilitate the selection of the recommendation(s). In order to develop the rationale in favor of some recommendations, consideration can be given to the detailed information provided in CX/FL 19/45/10 in relation to the selected recommendation(s).

**REQUEST FOR COMMENTS**

6. Member Governments and observers are invited to comment on the discussion paper, CX/FL 19/45/10, in particular on the recommendations as outlined in the paper; to provide their views on:
  - a) whether alcoholic beverages fall under the Codex definition of food as it is stated in Procedural Manual and the Codex Standard on Labelling of Prepackaged Food (see background information in paragraph 3).
  - b) The recommendations provided in CX/FL 19/45/10 and the rationale for their support to one or several of these recommendations (see background information in paragraphs 4-5 and Annex).
7. Member Government and observers who had not previously responded to CL 2018/24-FL which informed the discussion paper, CX/FL 19/45/10, are encouraged to provide replies to the questions in this CL to assist in the further development of the discussion paper.

**ANNEX**

