

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2b, 5, 6, 7, 8

FL/44 CRD/13
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-fourth Session

Asunción, Paraguay, 16-20 October 2017

(Comments from Russian Federation)

Agenda item 2b

When discussing the use of the terms flavor and flavouring as applied to food labelling (item 2b on the agenda), the Russian Federation generally supports the proposal to revise Subsection 4.2.3.4 of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985). We are also generally agree with the option proposed by the International Organization for the Flavour Industry (IOFI), which reads that flavourings may be either natural, in which case they are to be marked as “natural flavourings”, or artificial, in which case they are to be marked as “flavoirings”, including “artificial” and “nature-identical”.

Agenda item 5

When discussing the draft revision to the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) as applied to Date Marking, the Russian Federation holds the following positions:

- As for sub item iii of section 4.7 of the draft document, we propose to add the following wording to the provision on “Use-by Date” or “Expiration Date” for products whose durability does not exceed three months:

“On products with a durability of not more than three months the day, month and year are to be stated”. The year needs to be stated so as not to mislead consumers about to the expiration date of food product; to ensure the safety of foods and/or protect the consumer's life and health.

- Also we propose to include to sub item iii of section 4.7 provision on the mandatory statement of hour of manufacture in addition to date for food product with a durability of under 72 hours.
- For foods for which the manufacturer states an unrestricted shelf life, we propose the following wording: “No Expiration date if stored properly under certain conditions”.

We would like to express our objection to the inclusion into the draft document sub item viii of section 4.7, which provides list of foods for which date mark shall not be required as well as criteria which would determine if the product could be added to the list.

Further in-depth work on provisions of sub item viii of section 4.7 is required, and the following cases/criteria should be removed from the text:

1. “[28] 2. *Where the deterioration is evident to the consumer*”. This criterion would be extremely subjective, and would subject consumers' safety to significant risks.
2. “[30] 4. *Where the food is intended to be consumed within 24 hours of its manufactured*”. This criteria cannot guarantee the consumer's understanding of a product's expiration date. The absence of expiration date for products which should be consumed within 24 hours after manufacture may also be lead to such foods getting onto the market, or being consumed by buyers, after the expiration of the 24 hours, thus compromising food safety.

We would like to note that the wording of Criteria 3, “Where the key/organoleptic quality aspects of the food are not lost”, has no unequivocal interpretation and may be interpreted differently by manufacturers and consumers. In addition, for products contained in non-transparent packaging, consumers cannot verify their compliance with this criteria. Therefore, the wording of this provision needs to be thoroughly revised.

We also do not support the idea of including in the list of products which should not require date mark provided in the draft document the following types of foods: “bakers’ or pastry-cooks’ wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture” and “confectionery products consisting of flavoured and/or colored sugars”.

We would like to stress the need for taking into account scientific and/or technology-based substantiation in further efforts to formulate the criteria/cases and the list of foods which do not require mandatory Use-by-Date/Expiration Date information.

We believe that there is a need for a more restrictive wording of para 41 of sub point viii of section 4.7 as applied to the mandatory statement of the manufacture date and/or of the packaging date. (As things stand, the draft document permits voluntary statements).

Agenda item 6

The Russian Federation supports including new provisions into CODEXSTAN 1-1985 as applied to the labeling of non-retail containers of food which is not intended for sale to end users (consumers), and would like to add the following proposals:

- to amend Section 4, “General principles”, of the draft document to include a provision to the effect that if the transport package contains foods not accompanied by end-user package (unpacked) intended by the manufacturer for subsequent packaging (sweets, granulated sugar, etc.), then the label of such non-retail container must fully meet the requirements applied to prepackaged foods under Section 4 of CODEXSTAN 1-1985;
- to move information about components which cause allergic reactions to Section 6 of the draft document, and to allow for such information to be stated in accompanying documents rather than on the label;
- comments made about requirements as applied to stating Use-by-Date/Expiration Date, exceptions to these rules, and criteria applied to such exceptions which were submitted above under agenda item 5 (amending the CODEX STAN 1-1985 standard as applied to stating the manufacture date and the best-before date) should be valid to the appropriate discussions under agenda item 6.

The necessity of having the allergens list and the ingredient statement on the product label should be further discussed and justified taking into account consumer safety and wellbeing.

Agenda item 7

The Russian Federation fully supports the development of guidelines for using simplified front-of-pack nutrition labelling (FOPL). We note that the document needs to include a full definition for FOPL, to regulate the overall approach to the use of FOPL, and to set forth the fundamental principles of monitoring and assessing the effectiveness of such systems.

- We would like to inform the Committee that Russia is currently working on developing a national system for simplified front-of-pack nutritional information, and that Russia is prepared to take part in further work on this topic within the Committee.
- The FOPL systems need to be scientifically substantiated, i.e. based on nutrient profile models to be developed with regional peculiarities in mind; to be voluntary; and to apply exclusively to processed foods with a number of exceptions, such as foods for special dietary use, vegetable oils and fats, culinary ingredients, seasonings, etc.

Agenda item 8

As part of the discussion on the possibility of introducing the new notion of consumer preference claims, we suggest that the Committee revises the need for introducing the new notion in the context of product claims and look into the possibility of using the existing Codex definitions and standards in combination with national laws for the purpose of regulating consumer preference claims, and to speak against the launching of work on the topic.