

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 6, 7**

**FL/46 CRD16**

**ORIGINAL LANGUAGE ONLY**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-sixth Session

Virtual

27 September - October 1 and 7, 2021

Comments from Uganda

#### Agenda Item 6

### PROPOSED DRAFT GUIDELINES ON FRONT-OF-PACK NUTRITION LABELLING (CX/FL 21/46/6, CX/FL 21/46/6-ADD.1)

**Question 1:** Do you confirm the Committee majority preference to delete Section 5 and to incorporate relevant aspects from Section 5 to Section 4?

#### COMMENT

Uganda is in agreement to delete section 5 and incorporate relevant aspects from Section 5 in Section 4.

#### JUSTIFICATION

Uganda considers that this will avoid duplication in other parts of the guidelines.

**Question 2:** Do you agree that the proposed text for principle 4.3.1 manages the potential for conflict of interest in the development of a FOPNL system?

#### COMMENT

Uganda is in agreement that the proposed text for principle 4.3.1 manages the potential for conflict of interest in the development of a FOPNL system

Uganda further notes and proposes to replace 'collaboration' with 'partnership' in line one of the statement as well as deletion of 'government' from the second line since it is already taken care of in the opening of the sentence

#### JUSTIFICATION

Uganda feels that with government in the lead and with other parties/organizations partnering with it, it creates strong bond and attachment when the word partnership is used instead of word collaboration

**Question 3:** Do you agree with the change in focus for principle 4.3.2 to focus on facilitating consumer use of FOPNL?

#### COMMENT

Uganda is in agreement that 'FOPNL should be implemented in a way that facilitates consumer use of the FOPNL' as captured by principle 4.3.2.

**JUSTIFICATION**

This information is primarily focusing on the consumer as supplementary nutrition information thus there is no need to make reference to the reformulation of products. It will be based on consumer's preference that manufacturers may choose to reformulate their products.

**Question 4:** Considering the proposed changes to the principles, do you agree with deleting the principle groupings?

**COMMENT**

Uganda is in agreement with the deletion of the principle groupings for they are bulky and confusing.

**JUSTIFICATION**

All the principles are relevant in guiding development of FOPNL and grouping other than presentation is not adding any new value to the section.

**Question 5:** Consider if the Guideline are ready to advance to Step 5/8 or 5

**COMMENT**

Uganda supports the advancement and adoption of the guideline at step 5/8

**JUSTIFICATION**

It will act as guide as it is expediting a number of aspects captured there in

**Question 6:** Consider whether the Guidelines will be part of section 5 "supplementary nutrition information" of the Guidelines on Nutrition Labelling (CXG 2-1985), an annex to the Guidelines on Nutrition Labelling (CXG 2-1985), or a stand-alone document. (Which of the following options do you prefer for the placement of the Guidelines on FOPNL:

- part of section 5 of the Guidelines on Nutrition Labelling (CXG 2-1985)
- as an Annex to section 5 of the Guidelines on Nutrition Labelling (CXG 2-1985)
- a stand-alone document)

**COMMENT**

Uganda proposes that the guidelines be part of section 5 "supplementary nutrition information" of the Guidelines on Nutrition Labelling (CXG 2-1985).

**JUSTIFICATION**

Uganda appreciates that FOPNL is a component of nutrition labelling as defined in CGL 2 section 2 (definitions) as supplementary nutrition information. There as is the case of Nutrient declaration which is also a component of nutrition labelling, FOPNL which at present may be one of the supplementary information should be annexed to CXG.

**Agenda Item 7****PROPOSED DRAFT GUIDELINES ON INTERNET SALES / E-COMMERCE  
(CX/FL 21/46/7, CX/FL 21/46/7-Add.1)**

**Question 1:** Consider the revised draft guidelines on the food information requirements for prepackaged foods to be offered via e-commerce provided in Appendix II of CX/FL 21/46/7 and to comment on whether it is ready to be advanced to Step 5 for adoption by CAC44

**COMMENT**

Uganda is in agreement for the revised guidelines to be advanced to **step 5** for adoption by CAC44

**JUSTIFICATION**

Guideline is sufficient enough to guide purchase and sale of food

**Question 2:** Review the requirements relating to minimum durability within the draft guidance (CX/FL 21/46/7, Appendix II Section 4 paragraph 3) and consider whether the requirements as given balance the needs of consumers and industry.

**COMMENT**

Uganda is in agreement that any pre-packaged foods offered for sale to consumers are encouraged to have a minimum durability period, an indication of which should be displayed on the product information e-page. It should be made clear whether this is a guaranteed period or an expected or average period as captured by CX/FL 21/46/7, Appendix II Section 4 paragraph 3 because consumer safety is clearly brought as well as guidance to industry

**JUSTIFICATION**

Consumer trust and confidence is highly brought as well as the role of the industry which encourages development of sector

**Question 3:** Review the proposed alternative wording of sections 4 & 5 (CX/FL 21/46/7, Appendix II, 'Proposed alternative wording of section 4 & 5) and consider whether:

- the proposed alternative wording is too significant of a departure from the current guidance.
- the proposed alternative wording contains information which could be included to make the current guidance more effective.

**COMMENT**

Uganda is in agreement with the option 2 because

**JUSTIFICATION**

The principles and objectives further builds a quality culture, consumer confidence and trust as captured under the alternative section of 4 and 5

**Question 4:** Consider whether the issue of cross-border e-Commerce sales is outside the scope of the draft guidance and should be referred to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS

**COMMENT**

Uganda is in agreement that the issue of cross-border e-Commerce sales is outside the scope of the draft guidance and should be referred to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

**JUSTIFICATION**

It refers to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

This guideline should contain only requirements for food when placed in e-commerce platform.