



JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

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DISCUSSION PAPER ON FUTURE WORK AND DIRECTION FOR CCFL

Prepared by the UK in collaboration with the CCFL Canadian Secretariat

INTRODUCTION

1. At the 43rd meeting of the Codex Committee on Food Labelling (CCFL43) in 2016, the committee agreed to investigate possibilities for the future direction and work of the committee. It was agreed that Canada would prepare a paper summarising previously identified work that had not been taken forward, as well as presenting current work and proposals for future work. CCFL also agreed that the paper would be kept current at each session with a different delegation taking responsibility each time. This paper was subsequently presented at the CCFL44 in 2017 and updated and re-presented at CCFL45 in 2019.
2. At CCFL45, the committee agreed that the United Kingdom (UK) would next update the discussion paper on future work and direction for CCFL, to include the matter on criteria for the definition of “high in” nutritional descriptors for fats, sugars and sodium that was discussed.
3. The committee also agreed that members and observers could make proposals for consideration and inclusion in the paper. A request for submissions, CL 2020/08-FL was issued to Codex members and observer organisations in January 2020, open until April 2020. A total of five responses were received from four Member countries: United States of America (USA), Canada, New Zealand and Peru; and one observer organisation: International Chewing Gum Association (ICGA).
4. This paper presents:
 - Potential work for CCFL;
 - Emerging issues of relevance to CCFL;
 - Proposals regarding work areas previously considered by the Committee; and
 - An inventory table of potential CCFL future work (Appendix II).

POTENTIAL WORK FOR CCFL

A. Principles and Criteria for Food Labelling Exemptions in Emergencies

5. The United States recommended that CCFL consider future work to assist countries in determining any food labelling requirements that may be temporarily relaxed or exempted to mitigate the impacts of national or global public health emergencies, such as the current COVID-19 pandemic.
6. They identified that in response to COVID-19 a number of countries have implemented temporary flexibilities, including nutrition labelling in the food service industry and certain country of origin labelling requirements. They identified that other countries have taken the approach of identifying “low-risk” food labelling requirements to relax or exempt.
7. The flexibilities and guidance that countries are currently considering and implementing vary in scope, timing, and potential impact on fair trade and consumer protection. The US suggested that, given this existing variance and the certitude that future global emergencies will occur, high-level international principles and criteria may be helpful in guiding countries’ risk based decision-making processes on what food labelling requirements may be relaxed, for whom, how long, and under what emergency circumstances.

B. Establish a definition for ‘added sugars’¹

¹ See Appendix II, Inventory of Future Work, item 14 (Sugar Labelling)

8. ICGA proposed that CCFL consider further work on establishing a definition for “added sugars”. It was argued that a harmonized definition for “added sugars” would facilitate the interpretation of data to determine the public health significance of such claims and that the current lack of definition may present barriers to CCFL work on harmonising nutrition labelling; and that a harmonized definition would further reduce the risks of misinterpretations which could mislead the consumer.

C. Review the definition of ‘small unit’

9. ICGA proposed to review and harmonize the definition of and exemptions relating to “small units”. It was highlighted that the GSLPF defines “small unit” as a product with a surface area of less than 10 cm squared. These foods are exempt from mandatory labelling requirements regarding the list of ingredients, lot identification, date marking, storage instructions and instructions for use.

10. ICGA argued that exemptions for small units regarding front-of-pack nutrition labelling and the back of pack nutrient declaration should also be aligned. Within Codex provisions, nutrient declaration is mandatory for all pre-packaged foods for which a nutrition or health claim is made, but certain foods may be exempted on the basis of small packaging.

D. Trans Fatty Acids (TFAs)

11. The consumption of TFA is strongly associated with increased risk of coronary heart disease (CHD) and related mortality, and any reduction in TFA intake may help decrease CHD risk. CCNFSDU41 (2019) agreed to discontinue the work on the condition for a claim for “free” of TFAs and asked CCFL to consider possible actions in CCFL to support trans fat intake reduction². Canada submitted a project document for new work on TFAs which is included in Appendix I.

EMERGING ISSUES

A. Contactless Trade of Food

12. New Zealand noted the increased importance of contactless/minimal contact trade of food and the related increase in the importance of e-commerce and internet sales of food during the COVID-19 pandemic and moving forward. They proposed that CCFL should prioritise progressing the new work already underway to develop such guidance.

13. New Zealand further noted that the increase in contactless trade of food could likely increase the adoption and growth of other ‘contactless’ forms of technology such as 3D printing of food. The information requirements for foods produced in this way may be an area that guidance from CCFL is needed in the future.

B. Sustainability Claims

14. New Zealand also identified that, as issues related to the environment and climate change grow in importance for consumers, there may be a need for CCFL to consider guidance on potential ‘sustainability’ or credence claims that could be made on or about foods.

WORK PREVIOUSLY CONSIDERED BY THE COMMITTEE

A. Establish guidelines on health-related warnings³

15. ICGA proposed that CCFL consider further work on establishing guidelines on health-related warnings. The UK notes that in consideration of a World Health Organisation (WHO) discussion paper on alcohol labelling at CCFL44, the Committee agreed not to take forward any action in this area because health warnings on labels were deemed to be outside of the remit of CCFL. The Committee concluded that these issues should be dealt with by national governments and should not be the subject of any future work.

16. ICGA proposed that CCFL establish general guidelines covering health related warnings, to follow the same template as the non-addition claim section of the *Guidelines for the use of Nutrition and Health Claims* (CXG 23-2013). It was argued that health warnings such as “contains phenylalanine”, “excess consumptions of polyols lead to laxative effects” and “high caffeine content, not recommended for use by children” can be misunderstood by the consumer and occasionally by regulators.

17. ICGA proposed the development of new labelling provisions which would enable the use of health-related warnings on a case-by-case basis, reflecting up-to-date science and thorough risk assessments. They proposed that this could be accompanied by guidelines for food business operators to explain the scope and applicability of such health-based warnings.

² REP20/NFSDU, paras 123 - 131

³ See Appendix II, Inventory of Future Work, item 16 (Harmonization of criteria for the use of additional health related mentions for specific types of food)

18. ICGA argued that CCFL has a role to play in developing a common understanding of how health related warnings be regulated or prohibited through specific criteria and principles.

B. Consumer Preference Claims

19. At CCFL43, there was discussion of a proposal to revise the *General Guidelines for the use of the term "Halal"* (CXG 24-1997). The Committee agreed not to proceed with the revision as proposed but noted that the proposal raised a question on how to deal with consumer preference claims in a broader way. New Zealand suggested that CCFL may want to consider further work on consumer preference claims in this broad sense.

C. Discussion paper on a criteria for the definition of "high in" nutritional descriptors for fats, sugars and sodium

20. At CCFL45 the Committee considered a discussion paper, co-drafted by Canada and India, on criteria for the definition of "high in" nutritional descriptors for fats, sugars and sodium. This topic had been identified as a subject of possible new work at CCFL44 and the Committee agreed to issue a Circular Letter to collect information on the current practices, issues and any potential role for CCFL in this area.

21. The paper subsequently presented to CCFL45 summarised the responses received and highlighted the recommendations for consideration by CCFL to clarify the scope and intended applications of "high in" nutritional descriptors.

22. The Committee noted the importance of the issue but agreed that it was premature to consider new work at this time in light of the ongoing discussion in the Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) on possible work on nutrient profiling. The Committee further agreed that the proposed descriptors for "high in" should be considered in the context of the work on front of pack nutrition labelling (FOPNL) once it has further progressed.

23. The discussion paper originally presented to CCFL45 (CX/FL 19/45/11) is available [here](#) and the project document in FL/45 CRD/16 is available [here](#).

RECOMMENDATIONS

24. The Committee is invited to:

- a) Consider the proposals in this discussion paper for potential new work for CCFL;
- b) Consider and agree to initiate new work on trans fatty acids as presented in the project document in Appendix I;
- c) Consider whether discussion papers should be prepared on any of the topics identified in the Inventory of Work (Appendix II), noting the comments received in paragraphs 5 – 23 above.
- d) Request the Secretariat to issue a Circular Letter inviting new work proposals or emerging issues; and
- e) Identify a different delegation to take on responsibility for the discussion paper, who would be responsible to:
 - i. update the inventory table of CCFL future work (found in Appendix II), including input from the Circular Letter and removing items approved as new work; and
 - ii. prepare an updated discussion paper on future work and emerging issues for consideration by CCFL47.

PROPOSAL FOR NEW WORK ON TRANS FATTY ACIDS

(Prepared by Canada)

Background

In May 2004, the 57th World Health Assembly (WHA) endorsed the World Health Organization (WHO) Global Strategy on Diet, Physical Activity and Health (Global Strategy). The overall goal of this strategy was to promote and protect health by guiding the development of an enabling environment for sustainable actions at the individual, community, national and global levels that, when taken together will lead to reduced disease and death rates related to unhealthy diets and physical inactivity. The strategy addresses two main risk factors for non-communicable diseases, namely diet and physical activity. The Global Strategy made a recommendation with respect to diet for populations and individuals to limit energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats and towards the elimination of trans fatty acids (TFA).

In 2007, at the 35th session of the Codex Committee on Food Labelling (CCFL), the WHO presented a Draft Action Plan for the Implementation of the Global Strategy on Diet, Physical Activity and Health (CL 2006/44-CAC) which was based on the recommendations from the Global Strategy, the responses received from Codex members in the FAO/WHO electronic forum and the comments made by delegates in the 34th session of CCFL. The recommendations applying to labelling were intended to provide consumers with better information about the benefits and contents of foods.

At the 38th session of CCFL (2010), a project document (Appendix V, ALINORM 10/33/22) was developed and presented which described the planned work on the establishment of claims for sugars, salt/sodium and TFA which was approved by the 33rd session of the Codex Alimentarius Commission (2010).

At the 41st Session of CCFL (2013), the Committee agreed that the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) would be asked to develop proposed conditions for a “free of” TFA claim which was part of the project document for the establishment of claims for sugars, salt/sodium and TFA.

At its 40th session (2018), CCNFSDU decided to suspend the discussion on conditions for a “free of” TFA claim due to concerns regarding the use of available methods to accurately assess TFA content in foods at the proposed levels. Furthermore, Canada was asked to prepare a discussion paper on different risk management possibilities for the reduction of TFA within the mandate of Codex.

At its 41st session (2019), Canada presented the discussion paper and CCNFSDU agreed to inform CCFL of the Committee’s decision to discontinue the work on the condition for a claim for “free” of TFAs and to consider possible actions in CCFL to support trans fat intake reduction.

1. PURPOSE AND SCOPE OF THE NEW WORK

The scope and purpose of the proposed work is to revise certain sections of the existing *Guidelines on Nutrition Labelling* (CXG 2-1985) and *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) to:

- Require the mandatory declaration of TFA on labels of prepackaged processed foods; and
- Require the declaration of partially hydrogenated oil (PHO) and fully hydrogenated oil in ingredient lists of prepackaged processed foods and define these terms.

This work will provide consumers with consistent and clear information regarding the presence of TFA in prepackaged foods so they can make informed decisions.

2. RELEVANCE AND TIMELINES

The consumption of TFA is strongly associated with increased risk of coronary heart disease (CHD) and related mortality. The detrimental effects of TFA on blood lipids have a continuous dose-response relationship; therefore, any reduction in TFA intake may help decrease CHD risk. Globally, the World Health Organization (WHO) recommends TFA intake from all sources be limited to less than 1% total energy for the great majority of the population^{4, 5}.

⁴ <https://apps.who.int/iris/bitstream/handle/10665/246109/9789241510608-eng.pdf;jsessionid=4F18473DBC076743AC2D1F6BAEB55D19?sequence=1>

⁵ <https://www.nature.com/articles/ejcn200915.pdf>

It was recognized by the WHO that this target could be achieved by the virtual elimination of PHOs, the largest source of industrially produced TFA, and has since called for the elimination of industrially produced TFA in the food supply by 2023⁶. However, many countries have not implemented policy actions to meet this target.

The actions proposed are expected to result in meaningful reductions in TFA intake, which may help reach the target set by the WHO along with other initiatives that may take more time to put in place.

The proposed new work involves amendments to certain sections of existing Codex texts; therefore, can be completed in a timely fashion. Furthermore, this work may be more easily achievable by industry than some other possible actions and therefore, implemented more quickly.

3. MAIN ASPECTS TO BE COVERED

- 1) Amend the *Guidelines on Nutrition Labelling* (CXG 2-1985) to require the declaration of the amount of TFA where nutrient declaration is required.
- 2) Amend the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) to add a requirement that partially hydrogenated and fully hydrogenated oils be declared by their specific names (similar to Section 4.2.3.2 regarding pork fat, lard and beef fat) and to define these terms.

4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES

General criterion

Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.

Mandatory declaration of the amount of TFA on food labels as well as requiring the declaration of PHO and fully hydrogenated oil in the list of ingredients is aimed at lowering population-level TFA intakes. These strategies will provide consumers with information that would allow them to make informed choices regarding the TFA content of food and may also encourage food manufacturers to reformulate their food products to avoid highlighting nutrients of concern, thus improving the nutritional quality of the food supply available to consumers. Lower TFA intakes, either by a healthier food supply or consciously made healthier choices, can help decrease the risk of coronary heart disease.

This work will provide consistent labelling requirements which may be particularly important in developing countries that rely on Codex standards for their domestic situation.

Criteria applicable to general matters

a) Diversification of national legislations and apparent resultant or potential impediments to international trade

The proposed new work will provide greater harmonization, at an international level, of labelling regarding the mandatory declaration of the amount TFA and the declaration of PHO and fully hydrogenated oil in the list of ingredients. Currently, there are different national standards regarding these labelling measures, with some countries requiring mandatory declaration of the amount of TFA and the presence of PHOs and fully hydrogenated oils in the list of ingredients, while others do not.

This work will also provide a consistent definition of PHO and fully hydrogenated oil at an international level.

b) Scope of work and establishment of priorities between the various sections of the work.

It is proposed that specific amendments to existing Codex standards, as detailed in Section 3 above, be undertaken that would require mandatory declaration of the amount of TFA on the label, the declaration of PHO and fully hydrogenated oil in the list of ingredients, as well as defining the terms PHO and fully hydrogenated oil.

c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies)

In May 2018, WHO released an action package, called REPLACE, which provides a strategic approach to eliminating industrially-produced TFA, with the goal of global elimination by 2023². The REPLACE package serves as a roadmap for countries to implement actions to reduce and eliminate industrially-produced TFA, and outlines six strategic action areas to support the prompt, complete, and sustained elimination of industrially-produced TFA from the food supply.

⁶ <https://www.who.int/nutrition/topics/replace-transfat/>

This proposed new work complements and builds on the work being undertaken by the WHO aimed at reducing population-level TFA intake.

d) *Amenability of the subject of the proposal to standardization*

The purpose of this work is to amend certain sections of existing Codex standards to require consistent labelling regarding TFA, PHO and fully hydrogenated oil as a strategy aimed at reducing population-level intakes of TFA.

e) *Consideration of the global magnitude of the problem or issue.*

Increased intake of TFA (>1% of total energy intake) is associated with increased risk of coronary heart disease (CHD) events and mortality. Globally, more than 500,000 deaths in 2010 were attributed to increased intake of TFA. Industrially produced TFA have no known health benefits and its elimination is feasible and achievable. The reduction of population-level TFA intakes is a topic of interest globally, with the WHO recommending limiting TFA intakes to less than 1% of total energy for the great majority of the population.

The WHO reports that several high-income countries have virtually eliminated industrially-produced trans fats through legally imposed limits on the amount that can be contained in packaged food. And some governments have implemented nationwide bans on PHOs, the main source of industrially-produced trans fats. However, it is noted that action is needed in low- and middle-income countries, where controls of use of industrially-produced trans fats are often weaker, to ensure that the benefits are felt equally around the world.

The voluntary or mandatory declaration of the TFA amount and the declaration of PHO and fully hydrogenated oil in the list of ingredients are in place in a number of countries as one measure to help support reduction of TFA intakes.

5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES

The proposed new work is in line with the Commission's mandate for the development of international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The new work proposal will contribute to advancing Strategic Goals 1, 3 and 4.

Strategic Goal 1: Address current, emerging and critical issues in a timely manner

Reducing population-level intake of TFA is of increasing interest globally. Requiring mandatory declaration of the amount of TFA on the label, and declaration of PHO and fully hydrogenated oil in the list of ingredients are actions that can help reduce TFA intakes.

Strategic Goal 3: Increase impact through the recognition and use of Codex standards

The development of provisions in the consistent labelling of TFA and declaration of PHO and fully hydrogenated oil in the list of ingredients will provide benefits to consumers and would encourage food manufacturers to reformulate their food products to meet the Codex standard.

Strategic Goal 4: Facilitate the participation of all Codex Members throughout the standard setting process

Bringing this topic to CCFL will enable all members who have an interest lowering TFA intake in their population through the labelling of TFA, PHOs and fully hydrogenated oils, as well as those interested in the definition of PHOs and fully hydrogenated oils, to participate in the discussions.

6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENT

None identified.

7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE

None identified at this stage. This work may require input from CCNFSDU for determining a definition for PHO and fully hydrogenated oil.

8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES

None identified.

9. PROPOSED TIMELINE

Subject to the Codex Alimentarius Commission approval at its next session, it is expected that the work can be completed in two sessions

APPENDIX II

CODEX COMMITTEE ON FOOD LABELLING

INVENTORY OF FUTURE WORK

	Issue	Year discussed	Description	Reference
PREVIOUS WORK IDENTIFIED BY THE COMMITTEE				
1	<i>Truthful but Misleading Claims Labelling</i>	2001-2004	This discussion paper identified a number of types of truthful but misleading claims, such as "cholesterol free" on a potato that would never contain cholesterol. Discussion did not lead to identification of new work items.	CX/FL 17/44/9
2	<i>Natural</i>	1990-1994, 2010	This work focused on establishing a definition for "natural" and criteria for "minimal processing". It was noted that the use of these terms was already addressed by provisions in section 5.1 (claims) and the differing meanings of "natural" in various languages was also noted as a problem. In 2010, an observer proposed that the General Guidelines on Claims (CAC/GL 1-1985) be revised to include a definition of natural; however, there was no agreement to new work due to the guidance already provided in section 5.	CX/FL 17/44/9
3	<i>Vegetarian</i>	1997-2000	Proposals were presented for definitions of "Vegan", "Ovo-lacto Vegetarian" and "Lacto Vegetarian", for possible inclusion in either the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985), or, as conditional claims, in the General Guidelines on Claims (CAC/GL 1-1979). CCFL agreed to discontinue work in 2000 on Proposed Draft Guidelines for the Use of the Term "Vegetarian" as current differences in the definition and understanding of the term 'vegetarian' from country to country were too wide to allow the development of guidelines at the international level, and it was not possible to establish a common definition.	CX/FL 17/44/9
4	<i>Country of Origin Labelling</i>	2000-2005	Delegates had differing opinions on whether the Codex guidance provided in the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1 – 1985) on origin labelling was adequate or not and if there were difficulties in	CX/FL 17/44/9

	Issue	Year discussed	Description	Reference
			interpretation of the existing provisions. There was no consensus to recommend new work.	
5	<i>Advertising</i>	<i>1972-1990, 2004-2008</i>	Advertising had been discussed at length over the years, including whether the committee should develop a code of practice for food advertising and whether advertising by the electronic or mass media was under the mandate of CCFL. In 1985, the committee discussed a working paper including legal opinions from FAO and WHO, a summary paper of CCFL's work on advertising, and a proposal for a Code of Practice for Food Advertising. It was recommended that there was no need at that time to continue work on a code of practice for advertising of food. Further discussions occurred from 1987-1989 but no new work was generated. In 2008, a definition of advertising in relation to nutrition and health claims was adopted by the 31st Session of the Codex Alimentarius Commission and included in the Guidelines for the Use of Nutrition and Health Claims, CAC/GL 23-1997.	CX/FL 17/44/9
6	<i>Criteria for the Definition of "high in" Nutritional Descriptors for Fat, Sugar, and Sodium</i>	<i>2017, 2019</i>	<p>Currently Codex guidelines only include the "low in" criteria focused on nutritional deficiencies, it is suggested that criteria be developed for "high in" fat, sugar, and sodium.</p> <p>At CCFL45, the Committee agreed that while the work was valuable, it was premature to consider it at this time and it should await the progress of the work on FOPNL and the discussions in CCNFSDU on nutrient profiling. This topic would be retained in the paper on future work and direction for CCFL in order to keep track of the possible need for work at a later stage.</p>	CX/FL 17/44/9 REP19/FL, para. 121 FL/45 CRD/16
7	<i>Use of the terms flavours/flavourings and other qualifier terms</i>	<i>2017</i>	<p>Revision of Section 4.2.3.4 of CXS 1-1985</p> <p>The issue of use of the terms 'Flavour' and 'Flavouring' was raised owing to inconsistency in the use of terms as laid down in Codex Guidelines on the use of Flavourings and the standards addressing labelling of flavourings. This matter was considered in the CCFA48 which agreed to revise sections 4.1(c) and 5.1(c) of the <i>General Standard for the Labelling of Food Additives when sold as such</i> (CXS 107-1981); and to recommend to CCFL43 to consider the revision of section 4.2.3.4 of the <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985), taking into account the proposed revisions.</p>	CX/FL 17/44/2-Add.1 REP 18/FL, para. 9

	Issue	Year discussed	Description	Reference
			The issue was discussed in the CCFL44 wherein, it was decided not to make any revisions to the class titles “flavours” and “flavourings” in section 4.2.3.4 as these terms were already included in various national legislations in a number of countries. The Committee also noted that there might be a need to revise the qualifiers “natural”, “nature identical”, “artificial” as well other related sections in the Standard, i.e. section 5, and agreed that this could be addressed as part of overall improvements of CXS 1-1985	
8	<i>Consumer preference claims</i>	2017	At CCFL43 there was discussion of a proposal to revise the General Guidelines for the use of the term “Halal” (CXG 24-1997). The Committee agreed not to proceed with the revision as proposed but noted that the proposal raised a question on how to deal with consumer preference claims in a broader way. New Zealand suggested that CCFL may want to consider further work on consumer preference claims in this broad sense.	REP 18/FL , para. 52
POTENTIAL NEW WORK				
9	<i>Labelling of Foods in Multipack Format</i>	2017	It was suggested that either a new standard be developed or the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), be amended in several sections, including the scope, definitions, general principles, and mandatory labelling, to include labelling of prepackaged foods that include multipacked prepackaged foods (labelling of a package that contains or displays a certain number of units of the same or different products, each unit labelled individually); prepackaged foods in a joint presentation (a package that contains two or more units of products of a different nature, individually prepackaged and labelled together); and the inclusion of promotional items within multipacks.	CX/FL 17/44/9 ; Updated discussion paper and project document: CX/FL 21/46/11
10	<i>Alcohol Labelling and Guidance</i>	2017	For most the consumption of alcohol does not cause significant harm, but for many populations and individuals alcohol does pose harmful health effects. Given one of the primary objectives of the Codex standards is the protection of health it is important that consideration of such concerns be incorporated into the Codex labelling framework. An example for consideration is the provision of information on labels around alcohol strength and content and the energy content in the product.	CX/FL 17/44/9

	Issue	Year discussed	Description	Reference
			<p>Mandatory energy labelling of alcoholic beverages is rare internationally. With obesity on the rise globally, a number of agencies (global and within countries) are looking at strategies to combat this. Energy labelling on alcohol is something a number of countries are looking at as part of this and therefore it may be prudent for Codex to look at this to aid international harmonization.</p> <p>CCFL45 requested the Russian Federation to revise the discussion paper (CX/FL 19/45/10) presented at CCFL45.</p>	
11	<i>Innovation – use of technology in food labelling</i>	2017	<p>As information and communication technologies are becoming more powerful, more diverse, more accessible, and more widespread, there is opportunity to explore, at an international level, new approaches for providing consumers valuable information about the foods they buy. Use of electronic labelling, known as “e-labelling” is already in use on some very small packaged sized consumer goods such as telecommunications devices, in Canada, the US, Australia, Japan, the United Arab Emirates, and Costa Rica. In the EU it is common for users of electronic devices to be directed to a website for instructions for use. CCFL could consider if e-labelling could be used for some food labelling, such as the development of principles on what information needs to be attached to a food and what could be found on a website.</p>	<p>CX/FL 17/44/9;</p> <p>Update discussion paper and project document: CX/FL 21/46/9</p>
12	<i>Date Marking – additional guidance</i>		<p>The 41st session of CCFL established an electronic working group on date marking, which identified the following areas that might require additional guidance, for future work once the revision of the <i>General Standard for the Labelling of Prepackaged Foods</i> (CODEX STAN 1-1985) is completed:</p> <ol style="list-style-type: none"> a. date marking on frozen foods b. date marking and storage instructions to reflect a wide variation in climatic conditions c. storage instructions and expected shelf life on products post opening d. ethical considerations: <ol style="list-style-type: none"> i) exportation of expired or close to expired products ii) tampering of date marks e. date marking for special situations: <ol style="list-style-type: none"> i) date marking on primary and secondary packaging ii) date marking on foods which will be processed further and 	<p>CCFL44 CRD5</p>

	Issue	Year discussed	Description	Reference
			<p>iii) simplified date marking for small food businesses</p> <p>f. use of coded date marks and voluntary date marks</p> <p>g. inclusion of general principle statements</p> <p>In addition to the above two areas of potential work, the following topics were identified by member countries in response to a circular letter, CL 2016/31-FL, sent to members in September 2016¹. This circular letter provided an opportunity for members to raise emerging issues relevant to the work of CCFL.</p>	
13	<i>Class Names and other labelling in guidelines and standards in need of updating</i>		<p>Recognizing that many of the existing CCFL-developed standards and guidelines were developed a number of years ago, it may be worthwhile in the light of new information and trends, to review these texts to determine whether updating and revision is appropriate. Class names, for example, could be reviewed for relevancy by surveying member countries to gauge the degree of consistency of national legislation with the Codex standard. Depending on the outcome, new work could be proposed to promote fair practices in food trade. Similar surveys could be carried out for other elements of the labelling standards and guidelines, such as net contents and drained weight and name and address.</p>	CX/FL 17/44/9
14	<i>Sugar Labelling - Establish a definition for 'added sugars'</i>		<p>There has been increasing international attention on added sugars, including recent developments in labelling of added sugars. However, there is no internationally agreed definition for 'added sugars' which leads to difficulties in harmonising labelling standards.</p> <p>Additionally, because "added sugars" are not chemically different to sugars naturally occurring in foods such as fruit and milk, it is difficult to distinguish between added and naturally occurring sugars using analytical methods and so there are considerations with respect to standard methods for analysing added sugar content of foods and beverages and enforcement capabilities.</p> <p>A harmonized definition for "added sugars" would facilitate the interpretation of data to determine the public health significance of such claims and that the current lack of definition may present barriers to CCFL work on harmonising nutrition labelling; and that a harmonized definition could further reduce the risks of misinterpretations which could mislead the consumer.</p>	CX/FL 17/44/9
15	<i>Nutrition Labelling / Ingredient Labelling</i>		<p>With the increasing focus on food for health, and Codex's objective of protecting human health there is continued pressure to ensure consumers have all the information they need to make informed decisions. This is particularly the case where there are known health risks associated with certain foods such as high</p>	CX/FL 17/44/9

	Issue	Year discussed	Description	Reference
			levels of consumption of sugars and fats. Including the source of fats and oils and the potential to group different types of sugar in the ingredients list are two initiatives currently being explored in some countries.	
16	<i>Harmonization of criteria for the use of additional health related mentions for specific types of food</i>		The suggestion is to establish general guidelines covering additional health-related mentions, (e.g. "Phenylketonuric, contains phenylalanine" and "high caffeine content, not recommended for use by children, pregnant women breastfeeding or people sensitive to caffeine"), since certain ingredients or other substances or products when used in food production, and still present in the finished product, may cause allergies or intolerances in some people.	CX/FL 17/44/9
17	<i>Principles and Criteria for Food Labelling Exemptions in Emergencies</i>		<p>CCFL could consider future work to assist countries in determining any food labelling requirements that may be temporarily relaxed or exempted to mitigate the impacts of national or global public health emergencies, such as the current COVID-19 pandemic.</p> <p>In response to COVID-19, a number of countries have implemented temporary flexibilities, including nutrition labelling in the food service industry and certain country of origin labelling requirements. As well, other countries have taken the approach of identifying "low-risk" food labelling requirements to relax or exempt.</p> <p>The flexibilities and guidance that countries are currently considering and implementing vary in scope, timing, and potential impact on fair trade and consumer protection. Given this existing variance and the certitude that future global emergencies will occur, high-level international principles and criteria may be helpful in guiding countries' risk based decision-making processes on what food labelling requirements may be relaxed, for whom, how long, and under what emergency circumstances.</p>	
18	<i>Review and harmonize the definition of 'small unit'</i>		<p>The <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985) defines "small unit" as a product with a surface area of less than 10 cm squared. These foods are exempt from mandatory labelling requirements regarding the list of ingredients, lot identification, date marking, storage instructions and instructions for use.</p> <p>It has been noted that exemptions for small units regarding front of pack nutrition labelling and the back of pack nutrient declaration should also be aligned. Within Codex provisions, nutrient declaration is mandatory for all pre-packaged foods for which a nutrition or health claim is made, but certain foods may be exempted on the basis of small packaging.</p>	

	Issue	Year discussed	Description	Reference
19	<i>Trans Fatty Acid</i>	<i>2010</i>	The consumption of TFA is strongly associated with increased risk of coronary heart disease (CHD) and related mortality, and any reduction in TFA intake may help decrease CHD risk. CCNFSDU41 (2019) agreed to discontinue the work on the condition for a claim for “free” of TFAs and asked CCFL to consider possible actions in CCFL to support trans fat intake reduction.	CX/FL 21/45/12 Appendix I
20	<i>Contactless Trade of Food</i>		The increased importance of contactless/minimal contact trade of food and the related increase in the importance of e-commerce and internet sales of food during the COVID-19 pandemic and moving forward has been noted. The increase in contactless trade of food could likely increase the adoption and growth of other ‘contactless’ forms of technology such as 3D printing of food. The information requirements for foods produced in this way may be an area that guidance from CCFL is needed in the future.	
21	<i>Sustainability Claims</i>		As issues related to the environment and climate change grow in importance for consumers, there may be a need for CCFL to consider guidance on potential ‘sustainability’ or credence claims that could be made on or about foods.	