

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 5,6,8

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-third Session

Ottawa, Ontario, Canada, 9 – 13 May 2016

(Comments from Indonesia)

#### AGENDA ITEM 5: DATE MARKING (PROPOSED DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS)

Proposed Draft Revision		Indonesia Comments
2.	<b>DEFINITION OF TERMS:</b>	
	<p>“Date of Minimum Durability” or “Best before Date” or “Best Quality before Date” means the date which signifies the end of the <del>estimated</del> period, under any stated storage conditions, during which the product will remain fully marketable and will retain any specific qualities for which tacit <u>implied</u> or express claims have been made. However, beyond the data the food may still be <b>acceptable for consumption</b>.</p>	<p>Indonesia proposes to delete the term “Best Quality before date” since the term “best quality before date” is misleading to the consumers, it looks like a claim of the product. The term “date of minimum durability” or “best before date” are commonly used and familiar to the consumers.</p>
4.7	<b>Date marking and storage instructions</b>	
4.7.1	If not otherwise determined in an individual Codex standard, the following date marking shall apply unless clause 4.7.1(v) applies:	
	(ii) Where a Use-by Date or Use <u>or Consumed by date or Expires by or Expiration Date</u> is not required the Best before Date <u>or Best Before Quality Date</u> or Date of <b>Minimum Durability shall be declared</b> .	<p>Indonesia proposes to delete the term “best before quality date” as a consequences deletion in the definition above.</p>
	(iv) The date shall be <u>introduced</u> by the words: <ul style="list-style-type: none"> <li>• “Use-by.....” or “Best before .....” as <u>applicable</u> where the day is indicated; or “Use-by end ....” or “Best before end ...” <u>as applicable</u> in other</li> </ul>	<p>Indonesia proposes to add the complete terms as the definition above for the consistency.</p> <p>The clause to be read as follow :</p>

Proposed Draft Revision	Indonesia Comments
<p>cases. The words referred to in <b>this</b> paragraph <del>(iv)</del> shall be introduced and used by accompanied by:</p> <ul style="list-style-type: none"> <li>• either the date itself; or</li> <li>• a reference to where the date is given.</li> </ul> <p>The day and year shall <del>may</del> be declared by uncoded numbers numerical sequence except that with the year to be denoted by <b>2 or</b> 4 digits, and the month shall be declared by letters or characters <b>or numbers</b>. in these countries where such use will not confuse the consumer. <b><u>Where only numbers are used to declare the date or where the year is expressed as only two digits, the sequence of the day month year must be given by appropriate abbreviations accompanying the date mark. (e.g. DD/MM/YYYY)</u></b> The declaration of the month in date marking shall be consistent with 8.2</p> <p><u>1</u> <b><u>Consideration should be given to other Codex texts</u></b></p>	<p>“Use-by <b><u>or use or consumed by or expires by or expiration</u></b>” .....” or <b><u>“date of minimum durability or</u></b> “Best before .....” as <b><u>applicable</u></b> where the day is indicated; or “Use-by <b><u>or use or consumed by or expires by or expiration</u></b>” end.... or <b><u>“date of minimum durability or</u></b> Best before end....” <b><u>as applicable</u></b> in other cases. The words referred to in <b>this</b> paragraph <del>(iv)</del> shall be introduced and used by accompanied by:</p> <ul style="list-style-type: none"> <li>• either the date itself; or</li> <li>• a reference to where the date is given.</li> </ul>
<p><b>(v)</b> [(Notwithstanding 4.7.1 (i) and 4.7.1 (ii) a date of minimum mark durability <b><u>or best before date or best before quality date</u></b> shall not be required for:</p>	<p>Indonesia proposes to delete the term “best before quality date” as a consequences deletion in the definition above.</p>
<ul style="list-style-type: none"> <li>• confectionery products consisting of flavoured and/or coloured sugars;</li> <li>• chewing gum.</li> </ul>	<p>Indonesia proposes to delete these bullets below :</p> <ul style="list-style-type: none"> <li>• Confectionary products consisting of flavoured and/or coloured sugars;</li> <li>• Chewing gum</li> </ul> <p>Rationale :</p> <p>Ingredients of these products also have a shelf life and it can influence the physical and chemical properties of the product, in addition to the storage conditions can also affect.</p>
<p>Where a product is not required to bear a date mark in accordance with <b><u>4.7.1(vii)provision</u></b> the “Date of Manufacture” or the “Date of Packaging” <b><u>may/shall</u></b> be</p>	<p>Indonesia proposes to delete word “may”</p>

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	used.]	
	<b>[(x) Only one [type of] date mark should be used on a product at any one time.]</b>	Indonesia agrees to open the square brackets
4.7.2	In addition to the date of minimum durability date mark, any special conditions for the storage of the food shall be declared on the label where they are required to support the integrity of the date mark. <del>if the validity of the date depends thereon</del>	Indonesia proposes to delete the words “date of minimum durability” so the clause to be read as follow “  In addition to the <del>date of minimum durability</del> date mark, any special conditions for the storage of the food shall be declared on the label where they are required to support the integrity of the date mark. <del>if the validity of the date depends thereon</del>

#### **AGENDA ITEM 6 : LABELLING OF NON-RETAIL CONTAINERS (DISCUSSION PAPER)**

Indonesia supports the revision of the General Standard for the Labelling of Prepackaged Food (Codex Stan 1-1995) to include guidance for the labeling of Non-Retail Containers of Food as proposed by India.

Specific comments :

Annex 2 :

Section 4.9

**Provision for food in non-retail container: The following information if not provided in the label shall be provided in the accompanying documents-**

**(i) List of Ingredients**

**(ii) Nutritional Information**

**(iii) List of food additives**

**(iv) Name and address of the manufacturer or packer**

**(v) Country of Origin**

**(vi) Any other information required by the importing Country example including Halal Certification, Kosher Certification, Vegetarian/Non Vegetarian logo etc.**

Comment : Indonesia proposes to delete point (ii) Nutritional information since the nutrition information is not mandatory.

#### **AGENDA ITEM 8 : PROPOSAL TO REVISE THE GENERAL GUIDELINES FOR THE USE OF THE TERM “HALAL” (CAC/GL 24-1997)**

First of all, Indonesia would like express our appreciation to Egypt for preparing this discussion paper. Indonesia believes that the current guideline is sufficient enough and already in accordance with Islamic rules. If there are differences in implementation of the guideline is returned to the respectively state regulation since religious decision are the exclusive prerogative of religious authorities of the Muslim of each country.