

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda item 7

CX/FL 23/47/7 Add.1

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

#### Forty-seventh Session

Palais des Congrès, Gatineau, Canada

15 – 19 May 2023

### PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION: AMENDMENT TO THE *GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS*

#### Comments in reply to CL 2023/8/OCS-FL

*Comments of Argentina, Australia, Brazil, Canada, Chile, Colombia, Costa Rica, Cuba, Ecuador, Egypt, the European Union, Guatemala, Honduras, Indonesia, Japan, Kenya, Morocco, New Zealand, Panama, Paraguay, Peru, Saudi Arabia, South Africa, Thailand, Uganda, United Kingdom, USA, Zambia, EFA, FIVS, FoodDrinkEurope, ICA, ICGA, ICGMA, IDF/FIL and ISDI*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/8/OCS-FL issued in March 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex** and are presented in table format.

## ANNEX

GENERAL COMMENTS	MEMBER / OBSERVER
<p>Comment: Based on the comment Kenya has provided on scope and the specific comments below, there is need for redrafting these principles such they do appear to suggest that the current guidelines are either equal to or may be used as a replacement of GSLPF, for example principle 3 is already a requirement of GSLPG and there may be no need to have it as principle.</p> <p>Rationale: This will ensure that the draft is aligned to the project document as submitted to CAC.</p>	<b>Kenya</b>
<p>The United States generally supports the proposed draft Guidelines on the Use of Technology to provide Food Information, but some clarification could be helpful to Sections 4(4), 4(5) and 4(6). The United States supports aligning the definition of “food information” in this guideline with the definition being used in the proposed guidelines for e-commerce. The United States agrees that Sections 4(1) and 4(2) cover the intent of the work and currently the GSLPF itself does not require consequential updates. However, as the work progresses the Committee should remain mindful and confirm that updates are not required prior to finalizing the work. In Sections 4(2) and 4(4), the United States prefers the term “consumer.” The United States suggests that Sections 4(5) and 4(6) be consistent with how the issues of minimum durability and date marking are dealt with in the proposed guidelines on e-commerce. Depending on the outcome of discussion at CCFL47, the United States supports advancement to Step 5 for interim adoption by the CAC at its next session.</p>	<b>USA</b>
<p>The United Kingdom would like to thank Canada for their work and the opportunity to comment on the proposed draft Guidelines on the use of technology to provide food information (Appendix II of CX/FL 23/47/7). We appreciate the continued efforts to align and harmonise the use of technology and e-commerce texts throughout their development.</p>	<b>United Kingdom</b>
<p>New Zealand considers the key underpinning principle to this work is that any food information required by a Codex standard or related text to be shown on a label or labelling of a prepackaged food (mandatory information), must be available to consumers when necessary. This principle should underpin any decisions on whether mandatory information could be provided only using technology instead of being provided by the label/labelling.</p> <p>New Zealand considers that some information should always be provided on the physical label, this includes date marking, lot identification and allergen information. Date making and lot identification are specific to the purchased product and it is not practical to provide this unique product information via technology. Allergen information should be easily identified on the physical label and not require additional actions to locate due to the significant risk allergens poses to allergic consumers.</p> <p>New Zealand would only support the provision of other required food information being provided by means of technology if the end consumer can readily access that information.</p> <p>New Zealand does not consider access to technology by consumers is currently at a level where mandatory food information provided through technology would be accessible to consumers when they need it, but this is rapidly changing.</p> <p>We consider this guideline once finalized would guide governments in determining the appropriate use of technology to provide food information within their country based on their technological capabilities including access of consumers to technology, and their uptake of the technology.</p>	<b>New Zealand</b>
<p>Canada appreciates the opportunity to provide comments on the Proposed Draft Guidelines On The Use Of Technology To Provide Food Information. Canada believes these guidelines are important to enable competent authorities to continue focusing on consumer protection, health and safety, while accommodating innovation.</p> <p>Canada generally agrees with the provisions of the draft and provides further detail under specific comments.</p>	<b>Canada</b>
<p>Brazil would like to express its gratitude to Canada for coordinating the electronic working group (e-WG) and for preparing the proposed draft guidelines for circulation at Step 3 (CX/FL 23/47/7) and consideration by CCFL47. We appreciate the opportunity to provide comments on this proposal.</p> <p>Brazil agrees with the definition of “food information” as it is aligned with the definition used in the e-commerce draft guidelines.</p>	<b>Brazil</b>

GENERAL COMMENTS	MEMBER / OBSERVER
<p>Brazil also supports deleting the square brackets from "purchaser or" taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.</p> <p>Brazil believes that the outstanding discussion points indicated in CX/FL 23/47/7 can be resolved in the 47CCFL discussions and that the proposed guidelines will be ready to be advanced to Step 5.</p>	
<p>In general, Thailand does not object to advancing this draft to Step 5. However, further clarifications on some issues are still required.</p>	<b>Thailand</b>
<p>The Commission has considered the following responses:</p> <p>a)</p> <p>(i) With regard to the proposed definition of " information about foods", the Commission considers that it should be aligned with the term used in the CCFL Electronic Working Group on e-Commerce and Internet Sales; In that sense, it considers that it should remain as " information about foods " and not as "food information"</p> <p>ii) With respect to sections 4(1) and 4(2) the Commission considers that they cover the purpose of item (a) in the Project Document for this work (REP 21/FL, Appendix V) and that the General Standard for the Labelling of Prepackaged Foods (GSLPF) would not require revisions</p> <p>iii) Regarding to a reference to "purchasers" or whether "consumers" is sufficient, the Commission considers that the term "consumers" is sufficient and it is not necessary to include purchasers and consumers</p> <p>(iv) As to whether the criteria in Section 5 of the Proposed Draft Guidelines in Appendix II addresses points 3 (b)(i) and (ii) of the Project Document for this work, the Commission considers that yes, they do address points 3 (b)(i) and (ii) of the Project Document.</p> <p>(b) The Commission considers that the text is ready to advance a further step, and in this regard it recommends that it proceeds to Step 5</p>	<b>Peru</b>
<p>Panama appreciates the progress of this work and the proposal in view of the evolution of the use of technology in the needs of current technical food standards.</p> <p>In relation to the use of technology, we believe that its correct application, based on science, must ensure that the necessary information is provided to the final consumer.</p> <p>There is evidence that many countries have invested resources in modernizing their food labeling systems and schemes.</p> <p>In the case of Panama, the General Labeling standard for prepackages is an important reference, used in our national legislation, for which we are interested in knowing the evolution of this topic and the technical contributions in this regard.</p> <p>We will be presenting a proposal and specific technical comments at the CCCFL47 International Technical Committee</p>	<b>Panama</b>
<p>Cuba appreciates the opportunity to issue criteria about the proposal of this circular letter CL 2023/8/OCS-FL Request for comments on the Proposed Draft Guidelines on the use of technology to provide food information. We consider the content of the proposed draft of this guideline to be relevant.</p>	<b>Cuba</b>
<p>On behalf of its members, the International Chewing Gum Association (ICGA) thanks for the opportunity to provide comments in response to the CL 2023/8/OCS-FL on the proposed draft Guidelines on the Use of Technology to Provide Food Information through other means than on the label.</p>	<b>ICGA</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<b>Comments on whether: the proposed definition of “food information” should align with the same term used in the CCFL EWG on e-commerce/internet sales;</b>	
Food information should not align with e-commerce terms. It is suggested that the current definition in proposal CX/FL23/47/7 Appendix II should be retained.	<b>Guatemala</b>
Uganda supports the proposal to align the definition of “food information” with the same term used in the EWG on e-commerce Rationale: since it provides a reference to the already existing codex texts.	<b>Uganda</b>
FIVS agrees that the proposed definition of “food information” should align with the one used by the CCFL EWG on e-commerce/internet sales.	<b>FIVS</b>
Chile agrees that the proposed definition of “food information” should be aligned with the same term used in the CCFL e-commerce/Internet sales eWG. Therefore, we strongly support a harmonized definition of "food information" between these two workflows (e-commerce/internet sales and use of technology to provide food information).	<b>Chile</b>
We support the alignment of the definition between these texts.	<b>ICGMA</b>
South Africa agrees that the definition of “food information” should align with the same definition within the e-commerce/internet sales text. Rationale: To ensure consistency with the same term in the CCFL related texts.	<b>South Africa</b>
ICA believes that the definition of food information should align with terms used in e-commerce/internet sales.	<b>International Confectionery Association</b>
ISDI supports the alignment of the definition between these texts.	<b>International Special Dietary Food Industries</b>
The definition of 'food information' should be aligned with that used in the Guidelines for the sale of pre-packed food products on online marketplaces. In Europe, the EU Regulation 1169/2011 already offers a broad definition of 'food information', which includes, in addition to the information found on the label or in the accompanying materials of the products, also information provided by 'any other means, including tools of modern technology or verbal communication	<b>European Federation of Allergy and Airways Diseases Patients' Associations</b>
We support that the definition of “food information” aligns with the same term used in the CCFL EWG on e-commerce/internet sales.	<b>Japan</b>
The United Kingdom supports the proposed definition of 'food information' to align with the term used in the e-commerce text. It is important that consistency is maintained between Codex texts where possible. We agree that our joint definition accurately describes the term for use in both the e-commerce and use of technology texts. We appreciate Canada's collaboration with the common definition of 'food information'.	<b>United Kingdom</b>
The EUMS are of the view that the definition of “food information” should align with the one used in the CCFL EWG on e-commerce/internet sales. In line with the comments provided in the eWG on e-commerce/internet sales, the EUMS propose to amend the definition of food information as follows: “Food information” means the information about a prepackaged food that is made available to the final consumer by means of a label, other accompanying material, or any other means including modern technology tools or verbal communication.”	<b>European Union</b>
Comment: Kenya agrees to the recommendation of EWG that the definition should be aligned to the ongoing work on e-commerce. Rationale: This will allow consistency of the use of terminologies across Codex text	<b>Kenya</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
New Zealand supports harmonisation of definitions across Codex texts as much as possible. We consider the definition for 'food information' should align with the definition used in the draft Guidelines on the provision of food information for prepackaged foods offered via e-commerce.	New Zealand
Australia considers the meaning of 'food information' to be fundamental for both the proposed draft Guidelines for the use of technology to provide food information and proposed draft guidelines on the provision of food information for prepackaged foods offered via e-commerce. The concept has similar importance to that of 'label' and 'labelling' in the General Standard for the Labelling of Prepackaged Foods (CXS 1 -1985) (GSLPF). Therefore, to ensure consistency we consider the proposed definition of 'food information' in the proposed draft guidelines should be aligned.	Australia
Canada supports a harmonized definition of "food information" between the work streams for the Use of Technology to Provide Food Information and E-Commerce / Internet Sales.	Canada
The Kingdom of Saudi Arabia supports the alignment of the definition of "food information" with the same term used in the CCFL EWG on e-commerce/internet sales. It is important to unify the definition of all terms used throughout the Codex texts.	Saudi Arabia
IDF agrees that the definition of "food information" should align with the definition within the e-commerce text. The definition should be: "Food information" means the information about a prepackaged food that is the subject of a Codex text.	IDF/FIL
FoodDrinkEurope believes that there should be alignment between the definition of "food information" in the Guidelines on the use of technology to provide food information and the Guidelines on the provision of food information for prepackaged foods offered via e-commerce.	FoodDrinkEurope
Guatemala: Information about the food should not be aligned with the e-commerce terms. It is suggested to retain the definition currently contained in proposal CX/FL23/47/7 Appendix II.	Guatemala
Ecuador considers that the proposed definition of "food information" should indeed be aligned with the same terms used in the CCFL Electronic Working Group on e-commerce and internet sales, because that definition encompasses and is the subject of a Codex text.	Ecuador
Costa Rica believes that both terms should be aligned.	Costa Rica
Yes. It should be aligned with the same term used in the working group on e-commerce and internet sales. The following wording is also suggested: "Food information" means information on a prepackaged food that is the subject of a text of the Codex General Standard for the Labelling of Prepackaged Foods.	Argentina
Honduras agrees to align the definition with the subject of electronic commerce	Honduras
Chile agrees that the proposed definition of "food information" should be aligned with the same term used in the CCFL eWG on e-commerce/Internet sales. We therefore strongly support a harmonised definition of "food information" between these two workflows (e-commerce/internet sales and the use of technology to provide food information).	Chile
Colombia agrees that it should be the same definition so that the terms are aligned.	Colombia
We understand that the harmonization of the definition in all documents would assist in their implementation.	Paraguay
<b>Comments on whether: Sections 4(1) and 4(2) cover the intent of item (a) in Project Document for this work (REP 21/FL, Appendix V) and that the GSLPF would not require revisions;</b>	
Agrees that sections 4(1) and 4(2) of the proposed text in the draft document for Use of Technology cover what is stated in subparagraph a) of REP 21/FL, Appendix V.	Guatemala
Uganda supports that Sections 4(1) and 4(2) covers cover the intent of item (a) in Project Document for this work (REP 21/FL, Appendix V) and that the GSLPF would not require revisions; (this is to ensure clarity)	Uganda

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>Rationale: The entire text under 3.1 and 3.2 in the GSLPF has been maintained and only replaced “prepackaged food” with “food information.</p>	
<p>Chile considers that yes, sections 4(1) and 4(2) cover the intent of article 3(a) in the Project Document for this work. Consequently, the GSLPF does not require revision.</p> <p>Article 3a. of the Project Document suggests that the New Work proposal should consider revisions to the GSLPF to ensure that the current General Principles in Section 3 apply when using technology in food labeling, and that amendments to the GSLPF (and/or new Definitions) may be necessary for this security.</p> <p>Sections 4 of the draft guidance refer to the Principles for the use of technology in food labelling. Within this section, 4(1) and 4(2) consider the descriptions or presentations as part of the "Food Information", and that these should not mislead Buyers/Consumers.</p> <p>The current General Principles of the GSLPF and those suggested in the draft Guidelines for the use of technology in food labeling are identical.</p> <p>Sections 4(1) and 4(2) cover the intent of point 3(a) in the Project Document for this work. No revisions to the GSLPF are required.</p>	<b>Chile</b>
<p>We note that principles 4.1 and 4.2 restate principles 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepacked Foods (CXS 1-1985) (GSLPF). We believe that these principles do cover the intent of item (a) of the project document.</p> <p>However, as also stated below, we recommend that if the Committee decides that this is supplemental text to the GSLPF, Sections 4.1 and 4.2 could be deleted and replaced with wording similar to that proposed in Section 4 (“General Principles”) of the draft e-commerce guidelines: “The general principles in Section 3 of the GSLPF (CXS 1-1985) are applicable to food information whether it is provided on the physical label or via technology.”</p>	<b>ICGMA</b>
<p>South Africa agrees that sections 4 (1) and 4(2) of the proposed draft guidelines cover the intent of item (a), therefore, the GSLPF does not need amendments to achieve the outcome in the item (a) whereby the general principles in section 3 of the GSLPF are captured.</p> <p>Rationale: The general principles in section 3 of the GSLPF are captured in section 4 (1) and 4 (2) of the proposed draft Guidelines</p>	<b>South Africa</b>
<p>ISDI notes that principles 4.1 and 4.2 restate principles 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepacked Foods (CXS 1-1985) (GSLPF). ISDI believes that these principles do cover the intent of item (a) of the project document.</p> <p>However, as also stated below, ISDI recommends that if the Committee decides that this is supplemental text to the GSLPF, Sections 4.1 and 4.2 could be deleted and replaced with wording similar to that proposed in Section 4 (“General Principles”) of the draft e-commerce guidelines: “For the purpose of these guidelines, the general principles in Section 3 of the GSLPF (CXS 1-1985) are applicable to food information whether it is provided on the physical label, labelling, or via technology.”</p>	<b>International Special Dietary Food Industries</b>
<p>Sections 4(1) and 4(2) state that information provided through the use of technologies must not be false, misleading or deceptive, nor must it contain words, images or symbols which suggest a link with another product. Therefore, we believe these sections satisfy the intent in section 3, entitled 'General Principles' of the GSLPF.</p>	<b>European Federation of Allergy and Airways Diseases Patients' Associations</b>
<p>We believe that Sections 4(1) and 4(2) cover the intent of item (a) in Project Document for this work. We also think that it is not necessary to revise GSLPF because these proposed draft guidelines don't affect GSLPF.</p>	<b>Japan</b>
<p>The United Kingdom considers that sections 4(1) and 4(2) cover the intent of the item (a) in the Project Document for this work. However, consistent with our previous comments we would also like to suggest that summary sentence along the lines</p>	<b>United Kingdom</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>of 'the general principles of GSLPF apply', should introduce Section 4. This would remove the duplication in 4(1) and 4(2) and further align this text with the e-commerce text.</p> <p>Suggested text: "The general principles in section 3 of the GSLPF (CXS 1-1985) are applicable to food information shown on the digital platform of the pre-packaged food that is being offered for sale."</p>	
<p>The EUMS consider that sections 4(1) and 4(2) cover the intent of item (a) in the Project Document, as the points conform to what is provided in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985). However, instead of repeating provisions that are laid down in the GSLPF, the EUMS propose to include an overarching principle stating that all provisions laid down in the GSLPF shall also apply in the context of the use of Technology in food labelling where appropriate for mandatory and voluntary information.</p>	<b>European Union</b>
<p>New Zealand agrees that sections 4(1) and 4(2) cover the intent of item (a) in Project Document for this work, namely the review and revision (if necessary) of Section 3 of the GSLPF General Principles, for the use of technology in labelling. However, we do not consider it is necessary to repeat these principles in the GSLPF and consider it sufficient to reference alignment with these in the present text. We agree that there is no need to revise Section 3 of the GSLPF.</p>	<b>New Zealand</b>
<p>Australia considers sections 4(1) and 4(2) as proposed cover the intent of item (a) in the project document.</p>	<b>Australia</b>
<p>Canada agrees that sections 4(1) and 4(2) of the draft guidelines cover the intent of item 2(a) in the Project Document for this work, and that the GSLPF would not require revisions with these sections included in the guidelines.</p>	<b>Canada</b>
<p>The Kingdom of Saudi Arabia believes that Sections 4(1) and 4(2) cover the intent of item (a) in Project Document for this work (REP 21/FL, Appendix V) and that the GSLPF would not require revisions.</p>	<b>Saudi Arabia</b>
<p>IDF agrees that section 4(1) and 4(2) of the new guidelines cover the intent of item (a) such that the GSLPF does not need amendments to achieve the outcome in item (a) whereby the general principles in section 3 of the GSLPF are captured.</p>	<b>IDF/FIL</b>
<p>Sections 4(1) and 4(2) cover the intent of item 3(a) in Project Document for this work. Hence, FoodDrinkEurope considers that it is not necessary to revise the GSLPF.</p>	<b>FoodDrinkEurope</b>
<p>Sections 4 (1) and 4 (2) cover the intent of point (a) of the Project Document for this work (REP 21/FL, Annex V) and whether the General Standard for the Labelling of Prepackaged Foods (GSLPF) would not need to be revised; no need for revision</p>	<b>Morocco</b>
<p>We agree that sections 4(1) and 4(2) of the text proposed in the Draft Document for the Use of Technology covers what is set out in point (a) of the REP 21/FL, Appendix V.</p>	<b>Guatemala</b>
<p>Ecuador considers that sections 4(1) and 4(2) do cover the purpose of point (a) in the Project Document for this work (REP 21/FL, Appendix V);however, as progress is made in the revision of the document, it may be necessary to include certain definitions for further clarification of the document.</p>	<b>Ecuador</b>
<p>They do cover the purpose, however, it is not necessary to reaffirm principles 3.1 and 3.2 of the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</p> <p>If the Committee decides that this is a supplementary text to the GSLPF, then it is recommended that Principles 4.1 and 4.2 be deleted and replaced with wording similar to that proposed in Section 4: "General Principles" of the draft e-commerce guidelines: "The principles in Section 3 of the GSLPF (CXS 1-1985) are applicable to food information, whether provided on the physical label or through technology."</p>	<b>Costa Rica</b>
<p>Principles 4.1 and 4.2 are considered to reaffirm principles 3.1 and 3.2 of the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</p> <p>If the Committee decides that this is a supplementary text to the GSLPF, then it is recommended to delete Principles 4.1 and 4.2 and replace them with language similar to that proposed in Section 4: "General Principles" of the draft e-commerce</p>	<b>Argentina</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
guidelines: "The principles of Section 3 of the GSLPF (CXS 1-1985) are applicable to food information, whether it's provided on the physical label or through technology."	
<p>Chile considers that, yes, sections 4(1) and 4(2) do cover the intent of Article 3(a) in the Project Document for this work. Accordingly, the GSLPF does not require revision.</p> <p>Article 3a of the Project Document suggests that the proposed New Work should consider revisions to the GSLPF to ensure that the current General Principles in Section 3 are applied when using technology in food labeling, and that amendments to the GSLPF (and/or new Definitions) may be necessary for this purpose.</p> <p>Sections 4 of the draft guidance refer to the Principles for the Use of Technology in Food Labelling. Within this section, 4(1) and 4(2) consider descriptions or presentations as part of the "Food information", and that they must not mislead the Purchasers/Consumers.</p> <p>The current General Principles of the GSLPF and those suggested in the draft Guidelines for the Use of Technology in Food Labelling are identical.</p> <p>Sections 4(1) and 4(2) cover the intent of point 3(a) in the Project Document for this work. There is no need to make revisions to the GSLPF.</p>	<b>Chile</b>
Colombia agrees that the principles established in paragraphs 1 and 2 of section 4 of the draft under consideration correspond adequately with Section 3 of the GSLPF; however, it suggests the following editorial adjustments:	<b>Colombia</b>
It is our view that points 4.1 and 4.2 of the Proposed Draft correctly cover the General Principles of Section 3 of the GSLPF, so that such standard would not require revisions.	<b>Paraguay</b>
<b>Comments on whether: a reference to “purchasers” is needed, or if “consumers” is sufficient;</b>	
Considers that the term “consumer” is sufficient, as it fits the purpose and scope of the PRELIMINARY DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION. The consumer is the one to whom the information of the food prior to its consumption must finally be directed.	<b>Guatemala</b>
This definition refers to the purchasing and receiving of food. As a result, we feel there is no need to refer to or define “purchaser” in the proposed Guidance. We believe the reference to “consumers” as defined in the GSLPF is sufficient. ICA asks the term “purchaser” to be removed throughout the draft.	<b>International Confectionery Association</b>
<p>Uganda proposes that both purchaser and consumer are retained and as presented and proposes it should apply everywhere it [ ] appears.</p> <p>Rationale: This is because there are instances where the purchaser buys not for consumption but for further sale to the consumer. This will ensure that all intermediaries involved in the purchase of the product are catered for.</p>	<b>Uganda</b>
FIVS supports the reference to “purchasers” in addition to “consumers” given that the former refers to persons purchasing prepackaged foods for catering purposes, whereas the latter means persons and families purchasing and receiving food in order to meet their personal needs.	<b>FIVS</b>
Chile considers that the reference to "consumers" as defined in the GSLPF is sufficient.	<b>Chile</b>
<p>Harmonised and consistent terminology is preferred in “definitions”.</p> <p>‘Consumer’ is currently defined within the GSLPF:</p> <p>“Consumer” means persons and families purchasing and receiving food in order to meet their personal needs.”</p> <p>This definition refers to purchasing and receiving of food. As a result, we feel there is no need to refer to or define “purchaser” in the proposed Guidance. We believe the reference to “consumers” as defined in the GSLPF is sufficient and recommend amending the proposed text accordingly to remove “purchaser”.</p>	<b>ICGMA</b>



SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>South Africa is of the opinion that mentioning “consumers” is sufficient since the definition of consumer in the GSLPF also refer to “purchasers”. Therefore, references to “purchasers” should be deleted.</p> <p>Rationale: The definition of “consumer” in the GSLPF also refer to “purchasers”. this should also be inline with existing Codex text , which makes reference to consumers as in relation to its mandate to protect consumers' health</p>	<b>South Africa</b>
<p><i>ISDI supports considerations to include the term “purchasers” to reflect situations where products are not sold to consumers e.g. B2B, products for catering purposes. The GSLPF also covers these products, and such reference could further clarify the scope of these guidelines.</i></p>	<b>International Special Dietary Food Industries</b>
<p>The term 'consumers' in the various regulations concerning food safety refers to the 'final consumer' i.e. the one who 'will not use this product in the context of an operation or business of a food business'. Furthermore, a vulnerable sub-category of consumers, such patients with food allergies, should be considered. If these guidelines refer to the purchase of pre-packaged food, which can also take place by those who do not consume the product directly, such as restaurateurs or caterers, the term 'buyers' is more appropriate and inclusive of the two categories.</p>	<b>European Federation of Allergy and Airways Diseases Patients' Associations</b>
<p>Comment: Kenya does not support the use of the term purchaser in this draft or amending GSLPF</p> <p>Rationale: The mandate of Codex limits itself to the protection of Consumers and therefore introducing the term 'purchaser' may be going beyond Codex mandates. Further, labelling information is aimed at the end users who in most cases is the consumer.</p>	<b>Kenya</b>
<p>We think “consumers” is sufficient because the term “consumers” includes “purchasers” and “purchaser or consumers” may be duplicative.</p>	<b>Japan</b>
<p>The United Kingdom considers that the term 'consumers' is sufficient within the text. The term 'consumers' as defined in the GSLPF includes references to the purchasing of food and therefore we do not believe there is a need for the term 'purchasers'. This would also align with of the term 'consumers' within our e-commerce text.</p>	<b>United Kingdom</b>
<p>The EUMS are of the view that a reference to “consumers” is sufficient, as these guidelines and the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) are meant to cover the information provided by the business to the consumer (B2C).</p>	<b>European Union</b>
<p>New Zealand appreciates the explanation from the EWG chair on the rationale for the inclusion of 'purchasers' in addition to 'consumers' in the drafting of this Guideline. We agree that the definition of 'consumers' in the GSLPF would exclude those purchasing foods for catering purposes, as this is not 'personal needs'. However, this issue is not unique to the present text. Therefore, rather than including 'purchasers' in the present text consideration should be given to amending the definition of 'consumers' in the GSLPF to remove reference to 'personal needs' and therefore include those purchasing food for catering purposes in the definition of consumer. In almost every instance where 'consumer' is used in the GSLPF we consider purchaser would also be implied to align with the scope of this text, for example 4.1.1.3; 4.1.2. We do not consider these clauses were only intended to apply to those purchasing food to fulfil personal needs as the scope of the GSLPF is 'all prepackaged foods to be offered as such to the consumer or for catering purposes....'. Additionally, we note that the draft guidelines on the provision of food information for pre-packaged foods offered via e-commerce refer to 'consumers' however, we consider the intent is that these would also apply to those purchasing foods for catering purposes.</p>	<b>New Zealand</b>
<p>The GSLPF defines consumer as meaning 'persons and families purchasing and receiving food in order to meet their personal needs'. There is not a definition for 'purchaser' provided in the GSLPF. We note the project document referred to the scope of this work as prepackaged foods for the consumer or for catering purposes, in line with the scope of the General Standard for Labelling of Prepackaged Foods (GSLPF). We note the Codex Alimentarius procedural manual refers to the 'consumer'. Therefore, for consistency and clarity with other texts, we consider a reference to 'consumers' is sufficient. However, we note section 3.2 in the GSLPF refers to 'purchaser or consumer' so for consistency with the GSLPF in this case, we suggest section 4(2) in the draft guidance refer to both terms but elsewhere in the text the bracketed text [purchaser or] can be deleted.</p>	<b>Australia</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
FIA views that a reference to the purchasers is needed as "purchasers" includes people purchasing the prepackaged foods for catering purposes, who are not covered by the GSLPF definition of "consumer". The scope of this guidelines, as currently stated, is not limited to prepackaged foods for consumers. Therefore, purchasers should be included as well.	<b>Food Industry Asia</b>
The project document states that the scope of this work includes prepackaged foods for the consumer or for catering purposes, consistent with the scope of the GSLPF. Canada acknowledges that the term "consumer" does not apply to persons purchasing prepackaged foods for catering purposes. Canada believes that the proposed draft guidelines should include both "consumers" and "purchasers" in order to ensure the guidelines apply to the same scope of prepackaged foods as the GSLPF, and that these terms be used with the same meaning that is set out in the GSLPF.	<b>Canada</b>
The Kingdom of Saudi Arabia support adding the term "purchasers" along with "consumers" whenever it was mentioned in the proposed draft guideline. For the reason that not all individuals using technology for food information are the end user, thus, they cannot be solely identified as "consumers". With that being said, both terms (purchaser/consumer) can be replaced by the term "customer".	<b>Saudi Arabia</b>
A reference to purchasers is needed because "purchasers" includes persons purchasing prepackaged foods for catering purposes, who are not covered by the GSLPF definition of "consumer". The scope of these guidelines, as currently stated, is not limited to prepackaged foods for consumers. Therefore, purchasers should also be included.	<b>IDF/FIL</b>
Harmonised and consistent terminology among Codex Guidelines is preferred. 'Consumer' is currently defined in the GSLPF as "persons and families purchasing and receiving food in order to meet their personal needs." The definition in the GSLPF refers to purchasing and receiving of food. Therefore, FoodDrinkEurope believes that there is no need to refer to or define "purchaser" in the proposed Guidance.	<b>FoodDrinkEurope</b>
Reference to "purchasers" is necessary	<b>Morocco</b>
It considers that the term "consumer" is sufficient, since it is consistent with the purpose and scope of the PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION. The consumer is the one to whom the information of the food, prior to its consumption, must finally be directed.	<b>Guatemala</b>
Ecuador considers that the term purchasers would allow the criteria to be broadened for greater clarity.	<b>Ecuador</b>
Costa Rica considers that it is not necessary to refer to "purchasers", in order to be consistent with other CCFL texts where only "consumers" are mentioned. However, since persons who purchase pre-packaged food for catering purposes are not covered by the GSLPF definition of "consumer": (" <b>Consumer</b> " means persons and families purchasing and receiving food in order to meet their personal needs); Costa Rica would have no objection if it were decided to retain the term "purchasers".	<b>Costa Rica</b>
The reference could be extended to "purchasers" or another synonym, in order to involve the case of the figure that acquires the product beyond consumption. The reference to consumers – according to the GLSPF – would be limiting the public only to persons and families purchasing and receiving food in order to meet their personal needs.	<b>Argentina</b>
Honduras considers that the definition of consumers should be able to cover enterprises that consume products for catering purposes and consumers as natural persons, as both groups have personal needs to meet. As natural or legal persons in this case. Therefore, in this sense, the GSLPF should be reviewed, to adjust or amend the definition of consumers.	<b>Honduras</b>
Chile considers that the reference to "consumers", as defined in the GSLPF, is sufficient.	<b>Chile</b>
The reference to both actors should be retained, since the purchaser is not always the same as the consumer. In addition to the above, the use of both terms is aligned with the general labeling standard.	<b>Colombia</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
Taking into account the scope of application of this document, we understand that both terms should remain.	Paraguay
<b>Comments on whether the criteria in Section 5 of the Proposed Draft Guidelines in Appendix II of CX/FL 23/47/7 address items 3 (b)(i) and (ii) of the Project Document for this work.</b>	
I considered that the text of section 5 of the PRELIMINARY DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION is sufficiently clear and comprehensive.	Guatemala
ICA believes the criteria in section 5 are helpful starting point for discussion, and that they do address many considerations for determining if and how technology may be used to provide certain mandatory food information. However, ICA suggests some technical changes and deletion of 5.4 for reasons outlined in section 5 below.	International Confectionery Association
Uganda supports criteria as laid out in section 5 of the Proposed Draft Guidelines and that address items 3 (b)(i) and (ii) of the Project Document. Rationale: They provide clarity on the use of technology during electronic labelling	Uganda
Chile considers that the criteria in Section 5 of the Proposed Draft Guidelines in Appendix II of CX/FL 23/47/7 address points 3 (b)(i) and (ii) of the Project Document for this work. Among the “main aspects to be covered” (Section 3 of the Project Document), section (b) suggests that the New Work should outline broad criteria and/or develop guidelines (eg, supplementary text, separate guidelines) for the use technology in food labeling, specifically identifying the information that must always be physically present on the label of a prepackaged food at the time of sale, as well as the types of information that can be provided by technology [3(b)( i)], and that the guidance should identify any circumstances in which exemptions may be appropriate [3(b)(ii)]. Section 5 of the proposed Guidance refers to “other considerations in determining the appropriate use of technology to provide food information”. These considerations pertain to information that is provided by technology (rather than labeling), as well as information about foods that may not be required on the label (or can be provided by technology). Eight considerations are provided in Section 5 and we believe they address elements 3 (b)(i) and (ii) of the Project Document for this work adequately. Therefore, the Main Aspects are met.	Chile
We believe these criteria are a helpful starting point for discussion, and that they do address many considerations for determining if and how technology may be used to provide certain mandatory food information. Particularly after reading proposed points 5.4 and 5.5, an additional point we would like to highlight is that a greater focus on sustainability is encouraging some countries to consider allowing the use of technological devices (e.g., QR codes) to provide increasing amounts of food information. We encourage the Committee to allow for future flexibility and consider provision for allowing certain/specific mandatory information to be provided via technology.	ICGMA
South Africa is of the opinion that Section 5 of the proposed draft guidelines addresses items 3(b) (i) and (ii) of the project document for this work. However, we are of the opinion that section 4, would also require further amendments to clearly show when information must always be physically present on the label in order to fulfil item 3 (i) of the project document. Rationale:Section 5 covers criteria on the types of information that could be provided using technology as well as temporary exemptions in the case of emergency situations.	South Africa
The EUMS consider that Section 5 does not clearly address items 3(b)(i) and 3(b)(ii) for several reasons. In general, the EUMS consider that the scope of the Draft Guidelines is not yet clear and that it should be clarified whether and which principles apply to mandatory or voluntary food information, or to both. The EUMS are of the opinion that certain principles for the Use of Technology in Food Labelling apply to both type of food information, while others would only apply to mandatory food information. In this regard, the EUMS suggest restructuring Section 4 and 5 to present the principles accordingly. Regarding the principles below, the EUMS would like to raise the following comments:	European Union

SPECIFIC COMMENTS	MEMBER / OBSERVER
<ul style="list-style-type: none"> <li>– The EUMS consider principle (8) in section 4 to be very prescriptive and wonder if it is even necessary. The EUMS therefore suggest to delete it.</li> <li>– The EUMS do not agree to list in this draft guidance some circumstances where exemptions regarding the provision of food information may be appropriate (Section 5 principle (3) and (4)).</li> <li>– The EUMS consider that the principles aim at being general, rather than providing examples</li> </ul> <p>In the light of the above, the EUMS would like to propose to revise Section 4 and 5 as follows:</p>	
ISDI believes these criteria are a helpful starting point for discussion, and that they do address many considerations for determining if and how technology may be used to provide food information.	<b>International Special Dietary Food Industries</b>
Section 5 satisfies the requirements of items 3 (b) (i) and (ii) of the Project Document as it provides that information essential for consumer safety, such as the list of ingredients or the presence of allergens, are not offered solely through the use of technologies. Furthermore, various aspects must be considered in the use of technologies, such as the diffusion of access to these technologies in the specific geographical area.	<b>European Federation of Allergy and Airways Diseases Patients' Associations</b>
We think that the criteria in Section 5 of these Proposed Draft Guidelines address items 3 (b)(i) and (ii) of the Project Document for this work.	<b>Japan</b>
<p>The United Kingdom suggests Section 5 may benefit from being split into 2 distinct narratives one being protection and risk reduction (5.1 – 5.5) and the other around opportunities for enhanced information (5.6-5.8).</p> <p>The UK also suggests one possible approach to proposed section 4.4 aimed at removing risk of non-availability of information when technological means replace conventional, would be to say that technological means should not replace conventional except in situations where the food is offered for sale exclusively by technological means.</p>	<b>United Kingdom</b>
<p>New Zealand agrees with the intent of Section 5, i.e. to provide guidance on the type of information that could be provided using technology. However, we consider this should be limited to mandatory food labelling information as other food information can already be provided via technology. Limiting this section to mandatory food labelling information aligns with b(i) and b(ii) of the project document.</p> <p>b. Outline broad criteria/develop guidelines (supplementary text, separate guidelines) for the use of technology in food labelling, including:</p> <ul style="list-style-type: none"> <li>i. information that must always be physically present on the label of a prepackaged food at the time of sale, and the types of information that may be provided using technology.</li> <li>ii. circumstances where exemptions may be appropriate</li> </ul> <p>We also do not consider these are considerations but that they should also be principles. As such we propose the name of the section be “Appropriate use of technology to provide required food information”.</p> <p>New Zealand considers this section needs significant redrafting to make it clear what information must always be provided on the label and when other mandatory labelling information could be provided via technology (we outlined our views on these issues in our general comments).</p> <p>As this section provides guidance on what information could be provided via technology, we consider that this should come before the current section 4, which provides guidance on how information can be provided via technology.</p> <p>We have provided drafting suggestions to reflect these comments on the Proposed Draft Guidelines below.</p>	<b>New Zealand</b>
<p>Australia considers that section 5 of the proposed draft guidelines does broadly (but not specifically) address items 3 (b)(i) and (ii) of the Project Document.</p> <p>We note the preamble to section 5 refers to ‘mandatory food labelling information’ which we assume to mean information required by section 4 (Mandatory labelling of prepackaged foods) of the GSLPF. Therefore, to ensure clarity and coherence</p>	<b>Australia</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>between the GSLPF and section 5 and section 4 of the draft guidelines, we support amending section 4(4) of the draft guidelines to refer to 'Mandatory food information' as follows:</p> <p>(4) Mandatory food information required to be shown on a labelling or labelling of a prepackaged food... etc</p>	
<p>Canada agrees that the criteria in Section 5 addresses items 2(b)(i) and (ii) of the Project Document. Section 4 provides principles to follow in cases when technology is used, and Section 5 is intended to inform when technology is appropriate to be used.</p>	Canada
<p>The Kingdom of Saudi Arabia believes that the criteria in Section 5 of the Proposed Draft Guidelines in Appendix II of CX/FL 23/47/7 address items 3 (b)(i) and (ii) of the Project Document for this work.</p>	Saudi Arabia
<p>Section 5, but also section 4, would require further amendments to clearly show when information must always be physically present on the label, in order to fulfill item 3(b)(i) of the project document.</p> <p>Proposed amendments are marked below on the draft guidelines.</p>	IDF/FIL
<p>FoodDrinkEurope considers that the "considerations" listed in Section 5 properly address items 3 (b)(i) and (ii) of the Project Document.</p>	FoodDrinkEurope
<p>It considers that the text of section 5 of the PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION is sufficiently clear and complete.</p>	Guatemala
<p>The country considers that the criteria indicated in 3 (b)(i) and (ii) would be contemplated in the project document</p>	Ecuador
<p>We agree</p>	Costa Rica
<p>These points were not identified in the Proposed Draft Guidelines, please clarify which ones it refers to.</p>	Honduras
<p>Chile considers that the criteria in Section 5 of the Proposed Draft Guidelines in Appendix II of CX/FL 23/47/7 address points 3 (b)(i) and (ii) of the Project Document for this work.</p> <p>Among the "main aspects to be covered" (Section 3 of the Project Document), section (b) suggests that the New Work should outline broad criteria and/or develop guidelines (e.g., supplemental text, separate guidelines) for the use of technology in food labeling, specifically identifying the information that must always be physically present on the label of a prepackaged food at the time of sale, as well as the types of information that may be provided through technology [3(b)(i)], and that guidance should identify any circumstances in which exemptions may be appropriate [3(b)(ii)].</p> <p>Section 5 of the proposed Guidance refers to "other considerations in determining the appropriate use of technology to provide food information". These considerations relate to information that is provided by technology (rather than labeling), as well as food information that may not be required on the label (or that may be provided by technology).</p> <p>Section 5 provides eight considerations and we believe they adequately address elements 3 (b)(i) and (ii) of the Project Document for this work.</p> <p>Therefore, the Main Aspects are fulfilled.</p>	Chile
<p>It includes part of what is required in items 3 (b)(i) and (ii), but does not establish what will be the mandatory information that must appear on the physical label and that must not be provided using technology.</p>	Colombia
<p>Having analyzed section 5 of the Proposed Draft, it is our opinion that it broadly addresses the requirements of the project document for this work.</p>	Paraguay
<p><b>Comments on whether the Proposed Draft Guidelines are ready to advance to Step 5 in the Codex step procedure.</b></p>	
<p>Considers that the PRELIMINARY DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION is ready to move to step 5 taking into account the comments made in this consultation.</p>	Guatemala
<p>FIVS believes the text is ready to advance to Step 5</p>	FIVS.

SPECIFIC COMMENTS	MEMBER / OBSERVER
Yes, Chile considers that the Proposed Draft Guidelines are ready to advance to Step 5.	Chile
We support the advancement of the proposed draft guidelines to Step 5 in the process if the Committee is aligned and after text has been further refined.	ICGMA
<p>South Africa supports the advancement of the draft guidelines to step 5, taking note of the comments submitted for consideration.</p> <p>Rationale: The proposed draft document provides appropriate guidance regarding food information that should be provided using technology. This will also assist consumers to make informed choices and also increase harmonization and facilitate trade.</p>	South Africa
Indonesia supports that the Proposed Draft Guidelines are ready to be advanced to Step 5 in the Codex step procedure	Indonesia
Following further refinement of the text in line with our suggestions, ISDI could support the advancement of the proposed draft guidelines to Step 5.	International Special Dietary Food Industries
Uganda supports the proposed Draft guidelines be advanced to step 5 in the Codex step procedure	Uganda
EFA believes that the draft Guidelines can move to the next stage of the procedure.	European Federation of Allergy and Airways Diseases Patients' Associations
We think these draft guidelines are ready to advance Step5 although further discussion is needed for technical issue (such as how to guarantee that food information which consumers can access via physical label on the certain product through technology always pertains that certain product.)	Japan
The United Kingdom considers that the proposed draft guidelines are at a good point to advance to Step 5 in the Codex step procedure, provided that consensus is reached on the points outlined above.	United Kingdom
In light of the above comments, the EUMS consider that further discussion on the above mentioned points are needed before advancing to Step 5 for adoption by CAC44.	European Union
<p>New Zealand considers there is more work to do both in Section 4 and Section 5 before this guideline would be ready for advancement to step 5. The placement of this guideline would also need to be considered before the text could be advanced. New Zealand has articulated the changes we consider are necessary to sections 4 and 5 in the responses to specific questions and in comments on those sections of the proposed drafting.</p> <p>Regarding placement of the draft guidelines, New Zealand considers it would be appropriate for this text to be a supplemental text to the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) (GSLPF). This would align with the proposed placement of the draft Guidelines on the Provision of Food Information for Prepackaged Foods Offered via E-Commerce. If it is agreed at CCFL47 that the guidelines are to be a supplemental text to the GSLPF, this gives strength to New Zealand's suggestion that principles 4(1) and 4(2) be merged to refer to section 3 oof the GSLPF – see comments to drafting of these sections.</p> <p>New Zealand could support advancement of the proposed draft guideline to step 5 if:</p> <ul style="list-style-type: none"> <li>- The suggested changes to sections 4 and 5 are made during CCFL47; and</li> <li>- A decision is reached on placement of the guidelines.</li> </ul>	New Zealand
Australia would like to thank Canada for its work as Chair of the EWG which has made good progress on the proposed draft guidelines. As this is the first time the draft guidelines are to be discussed by CCFL, Australia views it will be important to hear from CCFL members to establish if the proposed draft guidelines are ready to be advanced.	Australia
Egypt supports the Proposed Draft Guidelines are advance and ready to Step 5 in the Codex step procedure.	Egypt

SPECIFIC COMMENTS	MEMBER / OBSERVER
Canada supports progressing the work on this item and believes that the proposed draft Guidelines may be ready to advance, pending discussions during plenary.	Canada
The Kingdom of Saudi Arabia supports the advancement of this Proposed Draft Guidelines to Step 5.	Saudi Arabia
FoodDrinkEurope supports advancement of the work to Step 5.	FoodDrinkEurope
No objection	Morocco
Considers that the PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION are ready to move forward to Step 5 taking into account the comments made in this consultation.	Guatemala
The country considers that the document has well-established criteria; however, these criteria and considerations in are similar in some ways to the work done in the "Guidance on the provision of food information for pre-packaged foods, to be offered through electronic commerce", pending yet what may be resolved, and encouraging work on the best decision.	Ecuador
Agreed.	Costa Rica
It is considered that the document could be in a position to proceed to Step 5. However, it is considered that there are still guidelines that need to be discussed in more detail, and it is also necessary to consider their relevance and link with the progress of the electronic commerce and Internet sales document.	Argentina
Honduras agrees to advance this document to Step 5	Honduras
Yes, Chile considers that the Proposed Draft Guidelines are ready to move forward to Step 5.	Chile
Agree to proceed to Step 5, paying attention to Colombia's response to question iv in relation to Section 5 of the document.	Colombia
In our opinion the document would be ready to move to Step 5	Paraguay
SPECIFIC COMMENTS ON THE PROPOSED DRAFT GUIDELINES	
1. Title	
Zambia welcomes the Proposed draft Guidelines on the Use of Technology to Provide Food Information and further commends the EWG on placing into consideration factors such as accessibility to technology, health safety of the consumer in ensuring that vital information is not missed. Countries such as Zambia with section of the population not adequately accessing technology will still need vital information such as expiry dates, best before dates, allergens declaration, information on health safety , labelling food for infants not to be placed in the category of information to be provided by technology	Zambia
Noting the scope of the guidance applies to food information accessed via technology which is linked from the physical label/labelling rather than accessed from other digital means, Australia considers 'labelling' needs to be reflected in the title of the guideline. A proposed revised title is 'Guidelines on the use of technology in food labelling'	Australia
We suggest to change the term <i>utilización</i> by the term " <i>uso</i> " ( <i>N of T: in the Spanish version</i> )	Honduras
2. Purpose	
New Zealand supports the purpose as written.	New Zealand
We understand the purpose of the work as outlined in the project document is to provide sufficient guidance regarding the use of technology to provide food labelling information. Also that the scope of the work is prepackaged foods for the consumer or for catering purposes, in line with the scope of the General Standard for Labelling of Prepackaged Foods (GSLPF). For clarity and to ensure coherence with the GSLPF we therefore propose that whom the information is intended for is included in the purpose as follows: 'To provide guidance on the use of technology for providing information about prepackaged foods to the consumer.'	Australia
We suggest changing the wording to: "Guidelines on the Use of Technology to Provide Food Information on Prepackaged Foods"	Honduras

SPECIFIC COMMENTS	MEMBER / OBSERVER
<b>2. Scope</b>	
Scope. It is not clear what is meant by the term "reference".	Colombia
EFA endorses the revised statement as it provides for more clarity.	European Federation of Allergy and Airways Diseases Patients' Associations
<p>Comment: Kenya proposes the scope be improved by moving the definition of technology to the clause on the definition and adding clarity to the scope that this standard does not intend to replace the requirements of CXS 1-1985 to read, 'These guidelines apply to food information that is accessed using technology via a reference on a prepackaged food's label or labelling. These guidelines will be used in addition to General Standard for Labelling of Prepackaged Foods (GSLPF) CXS 1-1985'</p> <p>Rationale: A scope should ideally not contain a definition. The inclusion of the new sentence will ensure consistency and intent of the project document, which emphasizes that the purpose of this work is to provide additional information over and above what is contained in GSLPF.</p>	Kenya
New Zealand supports the Scope as written.	New Zealand
<p>These guidelines apply to food information that is accessed using technology via a reference on a prepackaged food's label or labelling<sup>2</sup>. For the purposes of this document, technology refers to any electronic or digital means, such as websites, online <del>platforms and platforms</del>, mobile applications.</p> <p>We would like to propose the deletion of the word "and" to leave the examples open for future technology that may be used to provide food information. With "and" it might be interpreted as only three types of the technology can be used.</p>	Thailand
<p>These guidelines apply to food information that is accessed using technology via a reference on a prepackaged food's label or labelling<sup>2</sup>. For the purposes of this document, technology refers to any electronic or digital means, such as websites, online platforms and <del>mobile</del> applications.</p> <p>An application is a general term for software that could be on a mobile, laptop, other device, etc. The United States suggests simplifying the text to just "applications."</p>	USA
<p>These guidelines apply to food information that is accessed using technology via a reference on a prepackaged food's label or labelling<sup>2</sup>. <del>For the purposes of this document, technology refers to any electronic or digital means, such as websites, online platforms and mobile applications.</del></p> <p>Brazilian comments: Brazil suggests moving the definition of technology to section 3. We believe that this would improve the consistency of the document with other Codex standards and other related texts. We understand that the definition of "technology" only applies for the purposes of this document and that this will not change with its transfer to section 3. Furthermore, we understand that this amendment would contribute to improve the clarity of the scope section, since the definition of technology in the second sentence is very broad and can lead to interpretations that the scope would not be limited to the technology that is referenced on the prepackaged food's label or labelling.</p>	Brazil
<p>These guidelines apply to food information accessed using technology through a reference on the label or labelling of a prepackaged food. For the purposes of this document, technology refers to any electronic or digital medium, such as websites, online platforms and mobile applications<sup>2</sup>.</p> <p>We suggest removing: such as websites, online platforms and mobile applications.</p>	Honduras
<b>3. Definitions</b>	
<p>For the purpose of this guideline:</p> <p>"Technology" means to any electronic or digital means, such as websites, online platforms and mobile applications.</p>	Brazil



SPECIFIC COMMENTS	MEMBER / OBSERVER
Brazilian comments: Brazil suggests moving the definition of technology to section 3. We believe that this would improve the consistency of the document with other Codex standards and other related texts. We understand that the definition of "technology" only applies for the purposes of this document and that this will not change with its transfer to section 3. Furthermore, we understand that this amendment would contribute to improve the clarity of the scope section, since the definition of technology in the second sentence is very broad and can lead to interpretations that the scope would not be limited to the technology that is referenced on the prepackaged food's label or labelling.	
ICGA believes that the definition of food information should align with terms used in e-commerce/internet sales.	ICGA
Indonesia agrees that the proposed definition of "food information" should align with the same term used in the CCFL eWG on e-commerce/internet sales	Indonesia
New Zealand supports the proposed definition of Food Information.	New Zealand
Egypt proposes the definition of "food information" should align with the same term used in the EU No. 1169 to give more detail information about "food information" to support more understanding and clearly identification. "food information" means information concerning a food and made available to the final consumer by means of a label, other accompanying material, or any other means including modern technology tools or verbal communication."	Egypt
The term, "Codex text", may not be very clear. We would like to suggest adding a footnote to elaborate that it refers to "Codex standard, guidelines and recommendations".	Thailand
The following wording is suggested: "Food information" means information on a prepackaged food that is the subject of the Codex General Standard for the Labelling of Prepackaged Foods.	Argentina
<b>4. Principles for the Use of Technology in Food Labelling</b>	
<b>Principles for the Use-Presentation of Technology in Food Labelling</b> Information when Using Technology We suggest modifying the title of Section 4 to describe more clearly what these principles relate to as noted above: Principles for the Presentation of Food Information when Using Technology	ICGMA
Chile suggests that the title of Section 4 be modified to clearly describe what these principles are related to, the proposal is the following <b>Principles for the presentation of food information when technology is used</b> <b>Principles for the Use of Technology in Food Labelling</b>	Chile
Indonesia proposes that the word "purchaser" should be defined.	Indonesia
ISDI suggests modifying the title of Section 4 to more clearly describe what these principles relate to as noted above: Principles for the Presentation of Food Information when Using Technology	International Special Dietary Food Industries
New Zealand considers the title to Section 4 would more correctly be "Principles for the Use of Technology to provide food Information" We consider the "use of technology in food labelling unintentionally includes printing technologies etc.	New Zealand
FIA suggests the title of Section 4 be modified to clearly describe what these principles relate to, which reads as follows: "Principles for the Use of Technology in the Presentation of Food Information".	Food Industry Asia
<b>Principles for the Use-Presentation of Technology in Food Labelling</b> Information when Using Technology ICBA suggests the title of Section 4 be modified to clearly describe what these principles relate to as noted above and below: Principles for the Presentation of Food Information when Using Technology	ICBA

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p><b><u>Principles for the use of technology in food labeling</u></b></p> <p>It is suggested that the title of Section 4 be amended to clearly describe what these principles relate to. To this end, it is proposed to replace "the use of technology in food labelling" with the phrase "the presentation of food information when technology is used".</p>	Argentina
<p><b><u>Principles for the use of technology in food labeling</u></b> 4. Principles for the presentation of food information when using technology.</p> <p>Chile [...], the proposal is as follows: "Principles for the presentation of food information when using technology".</p>	Chile
<p><del>Food information that is accessed using technology via a reference on the prepackaged food's label or labelling should be based on the following principles:</del></p>	European Union
<p>Food information that is accessed using technology via a reference on the prepackaged food's label or labelling should be based on the following principles:</p> <p>Egypt supports Sections 4(1) and 4(2) and that they cover the intent of item (a) in Project Document for this work (REP 21/FL, Appendix V) and that the GSLPF would not require revisions.</p>	Egypt
<p>Food information that is accessed using technology via a reference on the prepackaged food's label or labelling should be based on the following principles:</p> <p>The United States suggests we review how Codex has defined labelling to be sure it provides sufficient scope for a variety of digital technologies.</p>	USA
<p><del>Food- All provisions applying to mandatory and voluntary food information as laid down in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) shall not be described or presented using technology also apply in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character the context of the Use of Technology in any respect food labelling.<sup>193</sup></del></p>	European Union
<p>Food information shall not be described or presented using technology in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.<sup>3</sup></p> <p>While New Zealand has no issue with the content of principles 4(1) and 4(2), we consider the text could be streamlined and covered by one principle. The current draft repeats the General Principles in Section 3 of the General Guidelines for the Labelling of Prepackaged Foods. We consider one principle referring to Section 3 of the GSLPF would be tidier and would ensure that if any changes were made to Section 3 in the future that these would automatically apply to this guideline. Our proposed drafting is:</p> <p>4(1) Food information shall not be described or presented using technology in a manner that is false, or misleading and should align with the General Principles as stated in Section 3 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</p> <p>As per our comments to question iii, we urge consideration of whether the definition of 'consumers' in the GSLPF should be amended to include those purchasing for catering purposes rather than the addition of 'purchasers' throughout this text</p>	New Zealand
<p>Food information shall not be described or presented using technology in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.<sup>3</sup></p> <p>Egypt prefers to point to "purchasers" in addition to "consumers", to making the principles are more comprehensive and accurate as the "consumers" term only may not be sufficient and the "purchasers" term are not necessary the "consumers".</p> <p>For example:</p>	Egypt

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>(1) Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.</p>	
<p>Food information shall not be described or presented using technology in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.<sup>3</sup></p> <p>FIA notes the Principle 4.1 and 4.2 are restating Principle 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) (GSLPF). If the Committee decides that this is a supplementary text to the GSLPF, we would recommend deleting Principle 4.1 and 4.2, and replacing them with phases similar to that proposed in Section 4 (General Principles) of the draft e-commerce guidelines: "The general principles in Section 3 of the GSLPF (CXS 1-1985) are applicable to food information whether it is provided on the physical label or via technology."</p>	Food Industry Asia
<p><del>Food information shall not be described or presented using technology in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.<sup>3</sup></del></p> <p>Costa Rica does not consider it necessary to maintain principles (1) and (2), since they are contemplated in principles 3.1 and 3.2 of the GSLPF. It is therefore recommended that they be replaced by simplified wording, similar to that proposed in section 4 ("General principles") of the draft guidelines for electronic commerce: "The general principles of Section 3 of the GSLPF (CXS 1-1985) are applicable to food information whether provided on the physical label or through technology."</p>	Costa Rica
<p>Food information <u>that is provided using technology</u> shall not be described or presented using technology in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.<sup>3</sup></p>	Colombia
<p>Examples of descriptions or presentations to which these General Principles refer are given in the Codex <i>General Guidelines on Claims</i> <a href="#">[4] Outlined in section 6 of the Codex General Standards for Labelling of Package Foods (GSLPF)</a></p>	International Confectionery Association
<p>Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <del>[purchaser or]</del> consumer to suppose that the food is connected with such other product.</p> <p>With reference to "purchasers" / "consumers", our understanding is that it refers to the purchasing and receiving of food. As a result, we do believe that there is no need to refer to or define "purchaser" in the proposed Guidance. A reference to "consumers" as defined in the GSLPF (CXS 1) is sufficient. ICGA kindly asks the term "purchaser" to be removed throughout the draft Guidelines.</p>	ICGA
<p>Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <del>[purchaser or]</del> consumer to suppose that the food is connected with such other product.</p>	International Confectionery Association
<p>Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead <del>the the</del><del>[purchaser or]</del> consumer to suppose that the food is connected with such other product.</p> <p>Principles 4.1 and 4.2 restate principles 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepacked Foods (CXS 1-1985) (GSLPF). We then recommend deleting Principles 4.1 and 4.2 and replacing them with a reference to GSLPF Section 3.</p>	ICGMA
<p>Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <del>[purchaser or]</del><u>purchaser or</u> consumer to suppose that the food is connected with such other product.</p> <p>Indonesia proposes to open the square brackets as follows:</p>	Indonesia

SPECIFIC COMMENTS	MEMBER / OBSERVER
(2) Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product	
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product. Principles 4.1 and 4.2 restate principles 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepacked Foods (CXS 1-1985) (GSLPF). If the Committee decides that this is supplemental text to the GSLPF, ISDI then recommends deleting Principles 4.1 and 4.2 and replacing them with a reference to GSLPF Section 3.	<b>International Special Dietary Food Industries</b>
<del>Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product.</del>	<b>European Union</b>
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product.	<b>New Zealand</b> See comments for 4(1)
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <del><b>[purchaser or]</b></del> consumer to suppose that the food is connected with such other product. Consumer is the better term and the one most often used in Codex.	<b>USA</b>
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <del><b>[purchaser or]</b></del> <b>purchaser or</b> consumer to suppose that the food is connected with such other product. Brazil supports deleting the square brackets from “purchaser or” taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.	<b>Brazil</b>
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product. Thailand does not object inclusion of the term "purchaser" in this draft document.	<b>Thailand</b>
Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product. ICBA notes that principles 4.1 and 4.2 already restate principles 3.1 and 3.2 from the Codex General Standard for the Labelling of Prepacked Foods (CXS 1-1985) (GSLPF). If the Committee decides that this is supplemental text to the GSLPF, we then recommend deleting Principles 4.1 and 4.2 and replacing them with wording similar to that proposed in Section 4 (“General Principles”) of the draft e-commerce guidelines: “The general principles in Section 3 of the GSLPF (CXS 1-1985) are applicable to food information whether it is provided on the physical label or via technology.”	<b>ICBA</b>
<del>(1) Food information shall not be described or presented using technology by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the <b>[purchaser or]</b> consumer to suppose that the food is connected with such other product.</del> Same than the previous answer.	<b>Costa Rica</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
We suggest improving the wording: that it does not mislead or deceive the consumer	Honduras
<p>Food information shall not be [described or presented using technology] by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the [purchaser or] consumer to suppose that the food is connected with such other product.</p> <p>Colombia is concerned about what the term "other devices" refers to in principle 4(2).</p>	Colombia
<p><del>Food information described or presented using technology shall not conflict with information provided on the label or labelling of the prepackaged food, including when shown in different languages.</del></p>	European Union
<p>New Zealand supports principle 4(3) as written. The removal of the words "and be consistent with" from previous drafting allows for more information to be provided by technology than is on the label.</p>	New Zealand
<p>Food Information <u>related to product health and safety</u> required to be shown on a label or labelling of a prepackaged food shall not be replaced using <del>technology unless there is certainty that the technology</del><del>[purchaser or] consumer can readily access that information.</del> Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	ICGA
<p>Food Information <u>related to the product health and safety</u> required to be shown on a label or labelling of a prepackaged food shall not be replaced using <del>technology unless there is certainty that the technology.</del> <del>[purchaser or] consumer can readily access that information.</del> Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>Above changes are suggested for clarity and to streamline the principle</p>	International Confectionery Association
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>FIVS welcomes this amended paragraph as it no longer requires off-label information to be specifically covered by a Codex text and instead leaves it to Member States to appropriately regulate off-label information.</p>	FIVS
<p>Food <del>Information</del><del>information concerning health and safety</del> required to be shown on a label or labelling of a prepackaged food shall not be replaced using <del>technology unless there is certainty that the technology.</del> <del>[purchaser or] consumer can readily access that information.</del> Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>We believe that it is not possible to know for certain that consumers have access to the food information all the time despite having appropriate technology, as access may be disrupted due to occasional bandwidth or other temporary technical issues. Therefore, we suggest modifying the principle as indicated above.</p>	ICGMA
<p><del>Food information that is required to be displayed on a label or labeling of a prepackaged food shall not be replaced using technology unless conditions exist for such information to be readily available to the consumer. See Section 5 for considerations in determining the appropriate use of technology to provide food information</del><del>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the [purchaser or] consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</del></p> <p>Chile understands that it is unrealistic to know with certainty that consumers always have access to food information through the relevant technology, since access may occasionally be interrupted due to bandwidth or other temporary technical problems</p>	Chile
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	South Africa

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>Food information required to be shown on a label/labelling of a pre-packaged food shall not be replaced using technology unless there are provisions to exempt certain information from being labelled on a food product. Refer to section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>Rationale: The only scenarios where mandatory information can be omitted from the label or labelling should be where there is an existing exemption e.g. small unit sizes, or labelling exemptions in emergency situations. It is not appropriate for there to be a blank option to not have mandatory information on the label/labelling if the information is accessible digitally because it is not feasible to always have digital access for everyone at all times</p>	
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <del>[purchaser or]</del><b>purchaser or</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>Indonesia proposes to open the square brackets as follows:</p> <p>(4) Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the purchaser or consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	<b>Indonesia</b>
<p>ISDI believes that it is not possible to know for certain that consumers have access to the food information all the time despite having appropriate technology, as access may be disrupted due to occasional bandwidth or other temporary technical issues. Therefore, ISDI suggests modifying the principle as indicated above: (4) Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless conditions exist to make such information readily available to the [purchaser or] consumer. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	<b>International Special Dietary Food Industries</b>
<p>FA believes that the revised version of this paragraph remains problematic and cannot support it. As it is now, the provision implies that whether an information can be replaced or not by electronic means depends on the level of 'certainty that the consumer can readily access that information'. But who determines certainty, and under what criteria? Generally, the level of 'certainty' is complex to define, as it depends both on individual factors and electronic means. It should be the duty of the seller to always provide the information, and not for the consumer to prove that they can access it. And, at any rate, health and safety information cannot be provided exclusively via electronic means.</p>	<b>European Federation of Allergy and Airways Diseases Patients' Associations</b>
<p>The principle in its current drafting appears to allude to the fact that GSLPF may be replaced by these guidelines. It is proposed that the principle be amended to read, 'Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology. unless there is certainty that the [purchaser or] consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>Rationale: As provided on our comment on scope, GSLPF is indispensable given that these guidelines aims at allowing for provision of further information over and above what is provided in GSLPF.</p>	<b>Kenya</b>
<p><del>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the [purchaser or] consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</del></p>	<b>European Union</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>New Zealand considers this principle is very important, however, we consider it fits better in our proposed section (modified from Section 5) on "Appropriate use of technology to provide required food information" which we propose is inserted above</p>	<b>New Zealand</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>the current section 4 (see response to question a) iv above). The principles in this section (current section 4) should focus on how the information should be provided.</p>	
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>FIA notes that it is unrealistic to know for certain that consumers have access to the food information all the time despite having appropriate technology, as access may be disrupted due to occasional bandwidth or other temporary technical issues. Therefore, we suggest the following amendments: "Food information required by a Codex text to be should on a label or labelling of prepackaged food shall not be replaced using technology unless conditions exist to make such information readily available to the <b>[purchaser or]</b> consumer."</p>	<b>Food Industry Asia</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology <del>unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that</del> <u>unless in certain situations, technology may be used to provide food</u> information. <del>Refer to</del> <u>In such case,</u> Section 5 for considerations in determining the appropriate use of technology to provide food <del>information</del> <u>information should be taken into account.</u></p> <p>Thailand proposes deleting the clause, "unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information."</p> <p>We are of the view that the mandatory information specified in CXS 1-1985 still needs to be declared on the label, not by technology. The clause is repetitive to the first two considerations mentioned in Section 5, regarding technological infrastructure and widespread and equal access to the technology, therefore it does not need to be mentioned in this principle.</p>	<b>Thailand</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is <u>reasonable</u> certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>The standard here (requiring "certainty that the consumer can readily access..") seems a bit higher than the language in Section 5 ("sufficient," "widespread and equal," etc.). The United States suggests adding a qualifier ("reasonable") to be more consistent with Section 5.</p>	<b>USA</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that <del>the the</del><b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	<b>USA</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <del>[purchaser or]</del><b>purchaser or</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>BBrazil supports deleting the square brackets from "purchaser or" taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.</p>	<b>Brazil</b>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless <del>there the food information is</del> <u>certainty that exempt from being on the label or labelling</u><del><b>[purchaser or]</b> consumer can readily access that information.</del> Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>The only scenarios where mandatory information can be omitted from the label or labelling should be where there is an existing exemption e.g. small unit sizes, or labelling exemptions in emergency situations</p> <p>It is not appropriate for there to be a blanket option to not have mandatory information on the label or labelling if the information is accessible digitally because it is not feasible to always have digital access for everyone at all times.</p>	<b>IDF/FIL</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless <del>there is certainty that the conditions exist to make such information readily available to [purchaser or] consumer can readily access that information</del><u>consumer</u>. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>ICBA notes that it is unrealistic to know for certain that consumers have access to the food information all the time despite having appropriate technology, as access may be disrupted due to occasional bandwidth or other temporary technical issues. Therefore, we rewording as indicated above.</p>	<p><b>ICBA</b></p>
<p>Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless <del>there is certainty that the</del> <u>conditions are in place for such information to be readily available to [the purchaser or] the consumer [purchaser or] the consumer can readily access that information</u>. Refer to Section 5 for <u>learning</u> the considerations <u>to take into account the time of</u> determining the appropriate use of technology to provide food information.</p> <p>Some adjustments to the wording are proposed, as it is not possible to assume with complete certainty that the consumers will always have access to food information despite having the appropriate technology, because such access may occasionally be interrupted by bandwidth problems or other technical inconveniences.</p>	<p><b>Costa Rica</b></p>
<p>Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the <b>[purchaser or]</b> consumer can readily access that information. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p> <p>It is considered that it is not possible to know with certainty that consumers have access to food information all the time despite having the appropriate technology.</p> <p>It is proposed to replace "there is certainty that the [purchaser or] the consumer has readily access to such information" with "the conditions under which such information is readily available".</p> <p>Proposed text:</p> <p>(4) Food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless there is certainty that the condition for such information is readily available. Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information.</p>	<p><b>Argentina</b></p>
<p><del>The information about foods</del> <u>food information-</u> <del>that must be listed-</del> <u>is required to be displayed</u> on a label or labelling of a prepackaged food shall not be replaced using technology unless <del>there is certainty that the conditions exist for such information to be readily available to the consumer</del>. Refer to Section 5 for considerations for determining the appropriate use of technology to provide food information. <del>Refer to Section 5 for considerations in determining the appropriate use of technology to provide food information</del></p> <p>Chile understands that it is unrealistic to know with certainty that consumers always have access to food information through relevant technology, as access may occasionally be interrupted due to bandwidth or other temporary technical problems. Therefore, we suggest rephrasing the first sentence as suggested.</p>	<p><b>Chile</b></p>
<p>Where food information is provided using technology, the reference on the label or labelling should link <del>directly</del> to this information and the food information should be available for the duration of <del>the food's stated shelf life-</del> <u>life of a product as indicated by the manufacturer on the physical label.</u></p>	<p><b>ICGA</b></p>
<p>Where food information is provided using technology, the reference on the label or labelling should link <del>directly</del> to this information and the food information should be available for the duration of the <del>food's stated shelf life-</del> <u>life of a product as indicated by the manufacturer on the physical label.</u></p> <p>ICA members previously recommended removing this principle. However, if it is included, ICA members ask for clarity on use of the term "directly" or its removal from this principle. Linking "directly" to information through a digital format may pose a</p>	<p><b>International Confectionery Association</b></p>



SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>challenge in situations where QR codes are multiuse. Manufacturers should have the flexibility to utilize QR codes to provide product information alongside other information such as recipe details on a product information page.</p> <p>For clarity, ICA also proposes amendments to 5.5 to make it clear that information provided through the use of technology will be available until the stated shelf life as indicated by the manufacturer on the physical label of the product.</p>	
<p>Where food information is provided using technology, the reference <u>anywhere</u> on the label or labelling should link <u>directly</u> to this <u>information and the information. The consumer is alerted to this</u> food information <u>should be available with terms such as "scan here for the duration of the food's shelf life, information on ingredients."</u></p> <p>We suggest principle 4.5 would be improved by incorporating principle 4.8 here as it is clearer to keep these concepts linked. Above is our proposed suggested edit.</p> <p>ICGMA also notes that there should be flexibility on the location of the related statement.</p> <p>We also ask for further clarity on the use of the term "directly" or its removal from this principle. Linking "directly" to information through a digital format may pose a challenge in situations where QR codes are multiuse. Manufacturers should have the flexibility to utilize QR codes to provide product information alongside other information such as recipe details on a product information page.</p>	<b>ICGMA</b>
<p><u>Where food information is provided using technology, the reference on the label or labeling must link directly to this information and the food information must be available for the duration of the shelf life of the food. The [buyer or] consumer is alerted to this food information with terms such as "scan here for ingredient information.</u><del>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</del></p> <p>Chile suggests that principle 4.5 can be improved by incorporating principle 4.8, as it is clearer to keep these concepts linked. The following wording is proposed</p>	<b>Chile</b>
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</p> <p>ISDI suggests principle 4.5 would be improved by incorporating principle 4.8 here as it is clearer to keep these concepts linked. Above is our proposed suggested edit.</p> <p>Alternatively, without rewording the principles, the current principle 4.8 could be moved to immediately follow principle 4.5. This keeps the two principles linked.</p> <p>(5) Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life. The consumer be alerted to this food information with terms such as "scan here for information on ingredients" or any similar statement.</p>	<b>International Special Dietary Food Industries</b>
<p><del>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</del></p>	<b>European Union</b>
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</p> <p>New Zealand considers the requirement to have the information available 'for the duration of the food's shelf life' could be problematic, and unnecessarily burdensome to manufacturers, for example when formulations change, or the product is no longer manufactured. We believe the intent of this principle is that the required information is available to the consumer/purchaser. This is covered by principle 4(4). We therefore propose the principle is reworded to "(5) Where food information is provided using technology, the reference on the label or labelling should link directly to this information</p>	<b>New Zealand"</b>
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</p>	<b>Food Industry Asia</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>FIA views that Principle 4.5 and Principle 4.8 are linked concepts and can be improved either by incorporating Principle 4.8 into Principle 4.5 as a single principle or have the Principle 4.8 following immediately behind Principle 4.5 as a related but separated principle.</p> <p>For the incorporation of Principle 4.8 into Principle 4.5, we suggest the addition of this text to the end of the sentence: "The [purchaser or] consumer is alerted to this food information with terms such as 'scan here for information on ingredients'".</p>	
<p>Where <u>technology is used to link</u> food information <del>is provided using technology directly to specific retail products</del>, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</p> <p>Edit intended to limit scope of 4.5 to specific retail products rather than general food information about the type of product.</p>	USA
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf <del>life</del> <u>(not less than best before date or expiration date)</u>.</p> <p>Thailand proposes adding a clause in parentheses after shelf life. This is to specify the minimum duration requirement for which food producers to maintain such information. However, for food whose shelf life is longer than the date declared on the label, food producers should be responsible for maintaining the relevant food information for consumers in case they use such products in the period after the best-before date.</p>	Thailand
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life. <u>The [purchaser or] consumer is alerted to this food information with terms such as "scan here for information on ingredients."</u></p> <p>ICBA suggests principle 4.5 can be improved by incorporating principle 4.8 here as it is clearer to keep these concepts linked together. Above is ICBA's suggested edit.</p>	ICBA
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's <del>shelf</del> <u>storage</u> life.</p>	Honduras
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to <del>the storage life</del> <u>this information</u> and the food information should be available for the duration of the storage life of the food.</p> <p>It is suggested that the wording be revised to: Where food information is provided using technology, the reference on the label or labeling should link directly to this information and the food information should be available for the duration of the shelf life of the food.</p>	Honduras
<p><del>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life.</del> Where food information is <u>provided using technology, the reference on the label or labelling should directly linked to this information and the food information should be available for the duration of the shelf life of the food. The [purchaser or] consumer is alerted to this food information with terms such as "scan here for ingredient information"</u></p> <p>Chile suggests that principle 4.5 can be improved by incorporating principle 4.8, since it is clearer to keep these concepts linked. The following wording is proposed.</p>	Chile
<p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life</p> <p>Where food information is provided using technology, the reference on the label or labelling should link directly to this information and the food information should be available for the duration of the food's shelf life</p> <p>This point should be corrected, both in this CL and in the other documents.</p>	Paraguay

SPECIFIC COMMENTS	MEMBER / OBSERVER
Food information described or presented using technology should be readily accessible to <del>[purchasers or]</del> consumers without having to provide or disclose <u>any personally identifiable</u> information that is used to identify an individual.	ICGA
Food information described or presented using technology should be readily accessible to <del>[purchasers or]</del> consumers without having to provide or disclose <u>any personally identifiable</u> information that is used to identify an individual.	International Confectionery Association
Food information described or presented using technology should be readily accessible <del>to to</del> <del>[purchasers or]</del> consumers without having to provide or disclose <del>information that is used to identify an individual</del> <u>any personal information</u> . We propose further clarification of the intent of principle 4.6 to ensure common understanding. The potential need to provide personal identification information was a concern raised previously by other members and observers. Therefore, we suggest adding the words “any personal” to this principle as shown above and deleting “that is used to identify an individual.”	ICGMA
<u>Food information described or presented using technology must be easily accessible to [buyers or] consumers without having to provide or disclose any personal information or identification used to identify a person</u> <del>Food information described or presented using technology should be readily accessible to [purchasers or] consumers without having to provide or disclose information that is used to identify an individual.</del> Chile suggests clarifying the intent of principle 4.6 to ensure a common understanding. The possible need to disclose personally identifiable information was previously expressed as a concern by other delegations and observers. Therefore, we suggest adding the words "no personal identification" to this principle as indicated	Chile
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. There is a need for clarity on what section4(6) is trying to address. It is also not clear why should food information be used to identify individual?	South Africa
Food information described or presented using technology should be readily accessible to <del>[purchasers or]</del> <u>purchasers or</u> consumers without having to provide or disclose information that is used to identify an individual. Indonesia proposes to open the square brackets as follows: (6) Food information described or presented using technology should be readily accessible to purchaser or consumers without having to provide or disclose information that is used to identify an individual	Indonesia
<u>(2)</u> Food information described or presented using technology should be readily accessible to <del>[purchasers or]</del> consumers without having to provide or disclose information that is used to identify an individual.	European Union
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. New Zealand supports this principle with an amendment as follows: “Food information described or presented using technology should be readily accessible to [purchasers or] consumers without having to provide or disclose information that can be used to identify an individual. We can support the addition of “purchasers or” if this is the decision of the Committee As per our comments to question a) iii, we urge consideration of whether the definition of ‘consumers’ in the GSLPF should be amended to include those shopping for catering purposes rather than the addition of ‘purchasers’.	New Zealand
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. FIA notes that the statement is referring to the ability of the information to identify a specific individual. Hence, we would like to suggest the following amendments: "Food information described or presented using technology should be readily accessible to	Food Industry Asia

SPECIFIC COMMENTS	MEMBER / OBSERVER
[purchasers or] consumers without having to provide or disclose any personally identifiable information that can be used to identify a specific individual."	
Food information described or presented using technology should be readily accessible to <del>{purchasers or}</del> consumers without <del>having to provide or disclose requiring</del> information that <del>is-could be</del> used to identify an individual. Edits intended to streamline language and strengthen privacy protection for consumers	USA
Food information described or presented using technology should be readily accessible to <del>{purchasers or}</del> <u>purchasers or</u> consumers without having to provide or disclose information that is used to identify an individual. Brazilian comments: Brazil supports deleting the square brackets from "purchaser or" taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.	Brazil
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that <del>is-can be</del> used to identify <del>an-the specific</del> individual. IDF recommends including the word "specific" and talking about the ability ("can") to identify rather than whether it "is" used for that purpose.	IDF/FIL
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose <u>any personally identifiable</u> information that is used to identify an individual. ICBA suggests further clarifying the intent of principle 4.6 to ensure common understanding. The potential need to disclose personal identifying information was a concern raised previously by other members and observers. Therefore, we suggest adding the words "any personally identifiable" to this principle as noted above.	ICBA
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose <u>any personal</u> information <del>that is used to identify an individual</del> . A drafting adjustment is suggested to clarify the intent of this principle.	Costa Rica
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. It is suggested to further clarify the intent of this principle to ensure a common understanding, considering that the possible need to disclose personal identification information was a concern previously raised by other members and observers. It is proposed to include the reference to "any" and "personal identification". Proposed text: Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose any personally identifiable information that is used to identify an individual.	Argentina
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. What does it mean to use the information to identify a person? When accessing our own information through cookies, if that is what is being referred to, we suggest that the wording be improved.	Honduras
Food information described or presented using technology should be readily accessible to <b>[purchasers or]</b> consumers without having to provide or disclose information that is used to identify an individual. <u>Food information described or presented using technology skould be readily accessible to [purchasers or] consumers without having to provide or disclose any information or personal identification that is used to identify an individual.</u>	Chile

SPECIFIC COMMENTS	MEMBER / OBSERVER
Chile suggested clarifying the intention of principle 4.6 in order to ensure a common understanding. The possible need to disclose personal identification information was what had previously been expressed as a concern by other delegations and observers. Therefore, we suggest adding the words "no personal identification" to this principle as stated above.	
When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable <del>[purchasers or]</del> consumers to ascertain that the food information pertains to that prepackaged food.	<b>International Confectionery Association</b>
<del>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable [purchasers or] consumers to ascertain that the food information pertains to that prepackaged food.</del>	<b>ICGMA</b>
<p><del>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable [purchasers or] consumers to ascertain that the food information pertains to that prepackaged food.</del></p> <p>Chile Suggests deleting Principle 4.7 to avoid duplication, because the proposed concept is already conveyed in Principles 4.5 and 4.6.</p>	<b>Chile</b>
<p>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable <del>[purchasers or]</del><u>purchasers or</u> consumers to ascertain that the food information pertains to that prepackaged food.</p> <p>Indonesia proposes to open the square brackets as follows:  (7)When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable purchaser or consumers to ascertain that the food information pertains to that prepackaged food.</p>	<b>Indonesia</b>
<p>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable [purchasers or] consumers to ascertain that the food information pertains to that prepackaged food.</p> <p>ISDI suggests removing Principle 4.7 to avoid duplication, because the proposed language is already conveyed by Principles 4.5 and 4.6.</p>	<b>International Special Dietary Food Industries</b>
<p><del>(3) Food information described or presented using technology shall be presented in one place, separately from other commercial information intended for sales or marketing purposes. When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable [purchasers or] consumers to ascertain that the food information pertains to that prepackaged food.</del></p>	<b>European Union</b>
New Zealand supports principle 4(7)	<b>New Zealand</b>
FIA suggests the removal of Principle 4.7 to avoid duplication as the concepts already conveyed in Principle 4.5 and 4.6.	<b>Food Industry Asia</b>
<p>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable <del>[purchasers or]</del><u>purchasers or</u> consumers to ascertain that the food information pertains to that prepackaged food.</p> <p>Brazilian comments: Brazil supports deleting the square brackets from "purchaser or" taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.</p>	<b>Brazil</b>
<p><del>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable [purchasers or] consumers to ascertain that the food information pertains to that prepackaged food.</del></p>	<b>ICBA</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
ICBA suggests removing Principle 4.7 to avoid duplication, as the proposed language is already conveyed by Principles 4.5 and 4.6.	
<p><del>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable <b>[purchasers or]</b> consumers to ascertain that the food information pertains to that prepackaged food.</del></p> <p>It is suggested that Principle 7 be deleted to avoid duplication, as the proposed intention is reflected in principles 5 and 6.</p>	Costa Rica
<p><del>When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable <b>[purchasers or]</b> consumers to ascertain that the food information pertains to that prepackaged food.</del></p> <p>Chile suggests deleting Principle 4.7 to avoid duplication, because the proposed concept is already conveyed in Principles 4.5 and 4.6.</p>	Chile
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”). <u>The code and related statement should be permitted anywhere on the food package.</u></p> <p>ICGA notes that there should be flexibility as to the location of the related statement.</p>	ICGA
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”). <u>The code and related statement should be permitted anywhere on the food package.</u></p> <p>ICA notes that there should be flexibility as to the location of the related statement. See proposed language.</p>	International Confectionery Association
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”).</p> <p>FIVS supports this amended paragraph.</p>	FIVS
<p><del>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”).</del></p> <p>We suggest removing Principle 4.7 to avoid duplication, because the proposed language is already conveyed by Principles 4.5 and 4.6. We also propose the incorporation of Principle 4.8 into Principle 4.5 as noted above.</p>	ICGMA
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”).</p> <p>Indonesia proposes to open the square brackets as follows:</p> <p>(8)If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to purchaser or consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”).</p>	Indonesia
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to <b>[purchasers or]</b> consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. “scan here for more information on ingredients”).</p>	International Special Dietary Food Industries

SPECIFIC COMMENTS	MEMBER / OBSERVER
ISDI also proposes the incorporation of Principle 4.8 into Principle 4.5 as noted above.	
<del>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to [purchasers or] consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").</del>	European Union
New Zealand supports principle 4(8)	New Zealand
FIA suggests either the incorporation of Principle 4.8 into Principle 4.5 or the reordering of Principle 4.8 immediately after Principle 4.5 as mentioned previously.	Food Industry Asia
If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to [purchasers or] consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").	USA
<p>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to [purchasers or] consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").</p> <p>Brazilian comments: Brazil supports deleting the square brackets from "purchaser or" taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.</p>	Brazil
<p><del>If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to [purchasers or] consumers, it should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").</del></p> <p>ICBA suggests incorporating Principle 4.8 into Principle 4.5 as noted above.</p>	ICBA
<p>If the purpose of the reference on the label or labelling of the pre-packaged food is not self-explanatory to the [purchaser or] consumers, it must be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").</p> <p>It is suggested to delete the example</p>	Honduras
<p><del>The reference and any explanatory statement shown on the label or labelling that links to food information to be accessed using technology should adhere to sections 8.1.2 and 8.1.3 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).</del></p>	European Union
New Zealand supports principle 4(9)	New Zealand
<p>The reference and any explanatory statement shown on the label or labelling that links to food information to be accessed using technology should adhere to sections 8.1.2 and 8.1.3 of the <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985). <u>If the reference is in a machine-readable format, it should be presented in a way that is easily read by the digital device (e.g., scanned).</u></p> <p>There is a need of additional text since the text of sections 8.1.2 and 8.1.3 of the GSLPF are not directly applicable to machine readable code such as QR codes.</p>	IDF/FIL
Food information described or presented using technology shall be clear, prominent and readily legible to the [purchaser or] consumer under normal settings and conditions of use of the technological platform.	ICGA
Food information described or presented using technology shall be clear, prominent and readily legible to the [purchaser or] consumer under normal settings and conditions of use of the technological platform.	International Confectionery Association

SPECIFIC COMMENTS	MEMBER / OBSERVER
Food information described or presented using technology shall be clear, prominent and readily legible to <del>the</del> <del>the</del> <del>[purchaser or]</del> consumer under normal settings and conditions of use of the technological platform.	ICGMA
Food information described or presented using technology shall be clear, prominent and readily legible to the <del>[purchaser or]</del> <del>purchaser or</del> consumer under normal settings and conditions of use of the technological platform. Indonesia proposes to open the square brackets as follows: (10) Food information described or presented using technology shall be clear, prominent and readily legible to the purchaser or consumer under normal settings and conditions of use of the technological platform	Indonesia
<del>Food information described or presented using technology shall be clear, prominent and readily legible to the [purchaser or] consumer under normal settings and conditions of use of the technological platform.</del>	European Union
New Zealand supports principle 4(10)	New Zealand
Food information described or presented using technology shall be clear, prominent and readily legible to the <del>[purchaser or]</del> consumer under normal settings and conditions of use of the technological platform.	USA
Food information described or presented using technology shall be clear, prominent and readily legible to the <del>[purchaser or]</del> <del>purchaser or</del> consumer under normal settings and conditions of use of the technological platform. Brazilian comments: Brazil supports deleting the square brackets from “purchaser or” taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.	Brazil
Food information described or presented using technology shall be shown in a language that is acceptable to the <del>[purchaser or]</del> consumer for whom it is intended.	ICGA
Food information described or presented using technology shall be shown in a language that is acceptable to the <del>[purchaser or]</del> consumer for whom it is intended.	International Confectionery Association
Food information described or presented using technology shall be shown in a language that is acceptable to <del>the</del> <del>the</del> <del>[purchaser or]</del> consumer for whom it is intended.	ICGMA
Food information described or presented using technology shall be shown in a language that is acceptable to the <del>[purchaser or]</del> <del>purchaser or</del> consumer for whom it is intended. Indonesia proposes to open the square brackets as follows: (11) Food information described or presented using technology shall be shown in a language that is acceptable to the purchaser or consumer for whom it is intended.	Indonesia
<del>Food information described or presented using technology shall be shown in a language that is acceptable to the [purchaser or] consumer for whom it is intended.</del>	European Union
New Zealand supports principle 4(11)	New Zealand
Food information described or presented using technology shall be shown in a language that is acceptable to <del>the</del> <del>the</del> <del>[purchaser or]</del> consumer for whom it is intended.	USA
<del>The language or languages of fFood_ood</del> information described or presented using technology shall be <del>shown in a language that is acceptable suitable</del> to the <del>[purchaser or]</del> consumer <del>for whom it in the country in which the food is intended marketed</del> . Principle 4. (11) of the proposed draft Guidelines could more closely align with section 7.2 of the “Proposed Draft Guidelines On The Provision Of Food Information For Prepackaged Foods Offered Via E-commerce” with this rewording.	Canada
Food information described or presented using technology shall be shown in a language that is acceptable to the <del>[purchaser or]</del> <del>purchaser or</del> consumer for whom it is intended.	Brazil



SPECIFIC COMMENTS	MEMBER / OBSERVER
Brazilian comments: Brazil supports deleting the square brackets from “purchaser or” taking into consideration the clarification provided by Canada in CX/FL 23/47/7 about the importance of this terminology to guarantee consistency between the scope of the draft guidelines and the scope of the GSLPF.	
Food information described or presented using technology shall be displayed in a language acceptable to the intended [purchaser or] consumer. It is suggested to adjust it to the GSLPF section	Honduras
<b>5. Considerations in determining the appropriate use of technology to provide food information</b>	
ICGA is of the view that the criteria in section 5 are a helpful starting point for discussion, and that they do address many considerations for determining if and how technology may be used to provide certain mandatory food information. However, ICGA respectfully suggests a few technical changes to be made as well as the deletion of section 5.4 for reasons outlined further below.	ICGA
<b>5. Considerations in determining the appropriate use of for deciding if technology can be used to provide food information</b> We propose a modified title for Section 5 to describe the purpose of these principles more accurately: Considerations for deciding if technology can be used to provide food information.	ICGMA
<b>5. Considerations for deciding whether technology can be used to provide food information</b> <b>Considerations in determining the appropriate use of technology to provide food information</b> Chile Suggests that the title of Section 5 be modified as shown below to more clearly describe the guidance provided by this section. Chile suggests replacing "should" with " may " as shown above, as this refers to voluntary information.	Chile
South Africa suggests that the entire section 5 should be put in [square brackets], subject to further discussions to provide clarity since mandatory food labelling information is required for both the label/labelling and using technology.	South Africa
<b>5. Principles for the UConsiderations in determining the appropriate use of technology Technology to provide mandatory food information</b>	European Union
ISDI proposes a modified title for Section 5 to describe the purpose of these principles more accurately. Considerations for deciding if technology can be used to provide food information	International Special Dietary Food Industries
New Zealand agrees with the intent of Section 5 to provide guidance on the type of information that could be provided using technology. However, we consider this should be limited to mandatory food labelling information as other information can already be provided via technology. Limiting this section to mandatory food labelling information aligns with b(i) and b(ii) of the project document. We also do not consider these are considerations but that they should also be principles. As such we propose the name of the section be “Appropriate use of technology to provide required food information”. As per our comments in response to a) iv, we also encourage consideration of this section coming before the current section 4. As per our general comments, New Zealand considers some information should always be provided on the physical label. Note we consider this incorporates the key points from 5.3 and 5.5. Therefore, we propose adding the following principle immediately below the heading “Appropriate use of technology to provide required food information” : "Date marking, lot identification and allergen information should not be provided exclusively using technology". Below this is where we propose our amended principle 4 would appear: "Other food Information required to be shown on a label or labelling of a prepackaged food shall not be replaced using technology unless the [purchaser or] consumer can readily access that information. Readily accessible information means within the geographic area or country where the food is sold that:	New Zealand

SPECIFIC COMMENTS	MEMBER / OBSERVER
<ul style="list-style-type: none"> <li>- sufficient technological infrastructure to support providing food information using that technology, such as in regards to prevalence and reliability of service; and</li> <li>- the general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</li> </ul>	
Egypt considers the criteria in items 3 (b)(i) and (ii) of the Project Document for this work that addressed in Section 5 of the Proposed Draft Guidelines in Appendix II of CX/FL 23/47/7 .	Egypt
FIA suggests the title of Section 5 be modified to clearly describe what these principles relate to, which reads as "Considerations for deciding if technology can be used to provide food information".	Food Industry Asia
<p><b>5. Considerations in determining the appropriate use of for deciding if technology can be used to provide food information</b></p> <p>ICBA suggests the title of Section 5 be modified to clearly describe what these principles relate to as noted above and as follows:</p> <p>Considerations for deciding if technology can be used to provide food information</p>	ICBA
<p><b>5. Considerations in determining the appropriate use of deciding whether technology can be used to provide food information</b></p> <p>It is suggested to improve the title so that it corresponds more with the content.</p>	Costa Rica
<p><b>5. Considerations in determining the appropriate use of deciding whether technology can be used to provide food information</b></p> <p>5. Considerations for determining whether technology can be used to provide food information</p> <p>g) Chile suggests that the title of Section 5 be amended as shown above to describe more clearly the guidance provided by this section. Chile suggests replacing "should" with "can" as shown above, as this refers to voluntary information.</p>	Chile
<p><b>5. Considerations in determining the appropriate use of-technology to provide food information</b></p> <p>Section 5. The text of the first paragraph seems to consider the possibility of using technology to replace the label or physical labeling of pre-packaged foods. If that is the case, it needs to be more clearly stated whether all or only some of the requirements of the physical label or labeling can be presented through technological means, which is particularly critical for safety aspects. On the other hand, it is not clear what information is referred to by "(...) food information that is not required on the label or labelling (...)", as this it is not specified in the 8 factors referred to in Section 5.</p>	Colombia
The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling <del>should</del> <u>may</u> be provided using technology:	ICGA
The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling <del>should</del> <u>may</u> be provided using technology:	International Confectionery Association
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling <del>should</del><u>may</u> be provided using technology:</p> <p>We suggest replacing "should" with "may" as this refers to voluntary information.</p>	ICGMA
The following factors <del>are for use in shall be followed when</del> considering if mandatory food labelling information can be provided using technology instead of the label or labelling, <del>or if food information that is not required on the label or labelling should be provided using technology:</del>	European Union

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling should be provided using technology:</p> <p>ISDI believes that the default should still be that mandatory information must be on the label and can be supplemented by use of technology to repeat that mandatory information. It is only as an exception that mandatory information may be provided solely through use of technology. We therefore also call out that there may be such exceptions (e.g. due to small unit sizes).</p> <p>ISDI suggests replacing “should” with “may” as this refers to voluntary information:</p> <p>The following factors are for use in considering if mandatory food labelling information can be provided using technology in addition of the label or labelling, or if food information that is not required on the label or labelling (including due to exceptions) may be provided using technology:</p>	<p><b>International Special Dietary Food Industries</b></p>
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling should be provided using technology:</p> <p>Following on from our comments linked to the title of this section New Zealand considers this paragraph is unnecessary.</p>	<p><b>New Zealand</b></p>
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling should be provided using technology:</p> <p>FIA views that it is important that the default is that mandatory information be provided on the label or labelling and the use of technology is to supplement that either by repeating the mandatory information by digital means or providing voluntary information. Therefore, we suggests the following amendments: "The following factors are for use in considering if mandatory food labelling information can be provided using technology in addition to on the label or labelling, or if food information that is not required on label or labelling ( including due to exemptions) may be provided using technology."</p>	<p><b>Food Industry Asia.</b></p>
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology <del>instead of in addition to on</del> the label or labelling, or if food information that is not required on the label or labelling <del>(including due to exemptions)</del> should be provided using technology:</p> <p>It is important that the default is still that mandatory information must be provided on the label/labelling and that the use of technology is to supplement that either by repeating the mandatory information by digital means or providing voluntary information.</p> <p>The addition of "including due to exemptions" is for clarity that the two situations where food information might not be needed on the label/labelling is either because it is not mandatory or because there is an exception to the default position.</p>	<p><b>IDF/FIL</b></p>
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling <del>should</del><u>may</u> be provided using technology:</p> <p>ICBA suggests replacing “should” with “may” as this part of the sentence refers to voluntary information.</p>	<p><b>ICBA</b></p>
<p>The following factors <del>should</del><u>may</u> be used in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling should be provided using technology</p> <p>It is proposed to replace the term " should " in the chapeau with "may", as these are voluntary provisions.</p>	<p><b>Costa Rica</b></p>
<p>The following factors are for use in considering if mandatory food labelling information can be provided using technology instead of the label or labelling, or if food information that is not required on the label or labelling should be provided using technology:</p>	<p><b>Argentina</b></p>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>It is suggested to replace the term " should " with "may", as this part of the sentence refers to voluntary information.</p> <p>Proposed text:</p> <p>The following factors should be used to consider whether mandatory food labelling information can be provided using technology instead of the label or labelling, or whether food information that is not required on the label or labelling can be provided using technology:</p>	
<p><del>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</del></p> <p>Chile suggest to delete Principle 5.1 as it duplicates what is conveyed in Principle 5.2.</p>	<b>Chile</b>
<p><del>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</del></p> <p>We suggest removal of Principle 5.1 as it duplicates what is conveyed by Principle 5.2.</p>	<b>ICGMA</b>
<p>There should be <del>sufficient</del> <b>sufficient appropriate</b> technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</p>	<b>European Union</b>
<p>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</p> <p>ISDI suggests removal of Principle 5.1 as it duplicates what is conveyed by Principle 5.2.</p>	<b>International Special Dietary Food Industries</b>
<p>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</p> <p>We consider this text provides more information on what is meant by readily accessible. Therefore, have linked this to the previous principle 4.4. in a proposed new section (see comments against the heading to current section 5 for detail)</p>	<b>New Zealand</b>
<p>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</p> <p>FIA suggests the removal of Principle 5.1 as it duplicates what is conveyed in Principle 5.2.</p>	<b>Food Industry Asia</b>
<p><del>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</del></p> <p>ICBA suggests removal of Principle 5.1 as it duplicates what is conveyed in Principle 5.2.</p>	<b>ICBA</b>
<p>There must be sufficient technological infrastructure to support the provision of food information using that technology within the geographical area or country where the food is sold, for example, with regard to the prevalence and reliability of the service.</p> <p>It is suggested to delete this paragraph considering that the concept of "sufficient infrastructure" should not be addressed in this document and could be considered as a condition for its implementation.</p> <p>Also, part of its description or approach would be covered by the following point 2.</p>	<b>Argentina</b>
<p>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, <del>such as</del> in regards to <del>prevalence and</del> reliability of service.</p>	<b>Honduras</b>
<p><del>There should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service.</del></p> <p>It is suggested to delete Principle 5.1 as it duplicates what is conveyed in Principle 5.2.</p>	<b>Chile</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>The general population, or a sub-set of the population for whom the food information is intended, should have <del>widespread and equal</del> access to the technology in that geographic area or <del>country, country</del> and <del>have adopted its uses</del> <u>such technology should be in widespread.</u></p> <p>While ICGA could agree with the argument that the general population should have access to technology used to provide food information, we consider that "equal" access to the technology may not mean that such an access is equally good. Therefore, we respectfully suggest removing that word. We also can agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "widespread" as shown in the proposal rewording.</p>	ICGA
<p>The general population, or a sub-set of the population for whom the food information is intended, should have <del>widespread and equal</del> access to the technology in that geographic area or <del>country, country</del> and <del>have adopted its use.</del> <u>the technology should be widespread.</u></p> <p>We agree that the general population should have access to technology used to provide food information. However, we consider that "equal" access to the technology may not mean that such access is equally good; therefore, we suggest removing that word. We also agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "widespread" as shown in the proposal above.</p>	International Confectionery Association
<p><del>The general population, or a subset of the population to whom the food information is directed, must have access to the technology in that geographic area or country, and the technology must be in widespread use. The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</del></p> <p>Chile agrees that the general population should have access to the technology used to provide food information. However, we believe that "equal" access to technology may not mean that access is equally good; therefore, we suggest removing that word. We also agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "pervasive"</p>	Chile
<p>The general population, or a sub-set of the population for whom the food information is intended, should have <del>widespread and equal</del> access to the technology in that geographic area or country, and <del>have adopted its</del> <u>the technology should be in widespread</u> use.</p> <p>We agree that the general population should have access to technology used to provide food information. However, we consider that "equal" access to the technology may not mean that such access is equally good; therefore, we suggest removing that word. We also agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "widespread" as shown in the proposal above.</p>	ICGMA
<p>The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</p> <p>ISDI agrees that the general population should have access to technology used to provide food information. However, we consider that "equal" access to the technology may not mean that such access is equally good; therefore, ISDI suggests removing that word. ISDI also agrees that the technology used to provide the information should be familiar to the general population, therefore ISDI suggests moving the word "widespread" as shown in the proposal above. So, it should be like this:</p> <p>(2) The general population, or a sub-set of the population for whom the food information is intended, should have access to the technology in that geographic area or country, and the technology should be in widespread use.</p>	International Special Dietary Food Industries
<p>The general population, <u>including vulnerable population,</u> or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use. <u>(3) The same level of information as by means of the package or the label shall be ensured. (4) Evidence of uniform consumer understanding and of the wide use of these means by consumers shall be demonstrated.</u></p>	European Union

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</p> <p>We consider this text provides more information on what is meant by readily accessible. Therefore, have linked this to the previous principle 4.4. in a proposed new section (see comments against the heading to current section 5 for detail)</p>	<b>New Zealand</b>
<p>The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</p> <p>FIA agrees that the general population should have access to technology used to provide food information. However, we consider that "equal" access to the technology may not mean that access is equally good. Therefore, we suggest removing the word "equal". We also agree that the technology used to provide the information should be familiar to the general population, so we suggest the following amendments: "The general population, or a sub-set of the population for whom the food information is intended, should have access to the technology in that geographic area or country, and the technology should be in widespread use."</p>	<b>Food Industry Asia</b>
<p>The general population, or a sub-set of the population for whom the food information is intended, should have <del>widespread and equal</del> access to the technology in that geographic area or country, and <del>have adopted its</del> <u>the technology should be in widespread</u> use.</p> <p>ICBA agrees that the general population should have access to technology used to provide food information. However, we consider that "equal" access to the technology may not mean that access is equally good; therefore, we suggest removing that word. We also agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "widespread" as indicated by edits noted above.</p>	<b>ICBA</b>
<p>The general population, or a subset of the population targeted by the food information, must have broad and equal access to the technology in that geographic area or country and to have adopted its use.</p> <p>Costa Rica agrees with this principle, but believes that it would provide greater clarity if it were unified with Principle 1.</p>	<b>Costa Rica</b>
<p>The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</p> <p>It is considered that the general population should have access to the technology used to provide food information. However, it is also considered that "equal" access to technology may not mean that such access is equally good; it is suggested therefore to delete that term.</p> <p>It is also agreed that the technology used to provide the information should be familiar to the general population, and it is suggested therefore to use the term "widespread" as indicated in the above mentioned editions.</p> <p>The following wording is suggested:</p> <p>(2) The general population, or a subset of the population targeted by the food information, should have access to the technology in that geographic area or country, and the technology should be in widespread use.</p>	<b>Argentina</b>
<p><del>The general population, or a sub-set of the population for whom the food information is intended, should have widespread and equal access to the technology in that geographic area or country, and have adopted its use.</del> <u>The general population, or a subset of the population targeted by the food information, should have access to the technology in that geographic area or country, and the technology must be in widespread use.</u></p> <p>Chile agrees that the general population should have access to the technology used to provide food information. However, we believe that "equal" access to technology may not mean that such access is equally good; Therefore, we suggest eliminating that term. We also agree that the technology used to provide the information should be familiar to the general population, so we suggest moving the word "widespread" as indicated.</p>	<b>Chile</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using <del>technology if its absence on the label or labelling could cause injury to the health of a consumer</del> technology.	ICGA
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using <del>technology if its absence on the label or labelling could cause injury to the health of a consumer</del> technology. ICA suggests removing the second part of the sentence to streamline this principle.	International Confectionery Association
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer. FIVS believes that an option should exist for the use of symbols on paper labels for allergens, and that allergens should then be in bold in the ingredients list, as currently mandated in the European Union.	FIVS
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) <del>should [shall]</del> not be provided exclusively using <del>technology if its absence on the label or labelling could cause injury to the health of a consumer</del> technology. For clarity and succinctness, we suggest deleting “if its absence on the label or labelling could cause injury to the health of a consumer.”	ICGMA
Food information concerning health and safety (e.g. ingredients, allergens, expiration <del>dates</del> <u>dates, warning/mandatory statement (such as on the label of sweetened condensed milk and foods for special medical purposes)</u> ) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer. Indonesia proposes to add “warning/mandatory statement (such as on the label of sweetened condensed milk and foods for special medical purposes” in principle 5(3) as follows: (3) Food information concerning health and safety (e.g. ingredients, allergens, expiration dates, warning/mandatory statement (such as on the label of sweetened condensed milk and foods for special medical purposes)) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer.	Indonesia
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer. EFA is concerned over the following clause: ‘if its absence on the label or labelling could cause injury to the health of a consumer’. We believe that under no circumstances must information concerning health and safety e.g. allergens be provided exclusively via technology. After all, every food can cause injury to the consumer. Technology is a useful tool to inform about food ingredients and allergens, but must be always complementary to the full information on allergens that appears in the label. This includes also information that is voluntary in most jurisdictions (including the EU) such as Precautionary Allergen Labelling.	European Federation of Allergy and Airways Diseases Patients’ Associations
<del>Food-This information concerning shall not relate to health and safety safety(e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer.</del>	European Union
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer. As per our general comments, we consider that date marking and allergen declarations should never be provided exclusively using technology due to the risk this could pose to consumers by not having this information immediately accessible. We have captured this concept with our suggested changes at the beginning of section 5.	New Zealand
Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology <del>if its absence on the label or labelling could cause injury to the health of a consumer</del> . Brazilian comments: Brazil understands that food information concerning health and safety shall always be provided in food labelling to avoid injury to the health of a consumer. Thus, we do not support the declaration of this type of information	Brazil

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>exclusively using technology and suggest deleting the last part of the sentence. It is not clear in which situations the omission of this type of information on food labels would not pose a risk to the health of the consumer.</p>	
<p>Food information concerning health and safety (e.g. ingredients, allergens, expiration dates) should not be provided exclusively using technology if its absence on the label or labelling could cause injury to the health of a consumer.</p> <p>In our opinion, the terms, "health and safety", are unclear whether they limit only to food safety or include nutrition and food for special dietary uses that can also affect the health of consumers. If this has been made clear, the clause, "injury to the health", should also be adjusted to clarify its scope.</p>	<b>Thailand</b>
<p>Food information relating to health and safety (e.g. ingredients, allergens, expiry dates) should not be provided exclusively using technology if its absence on the label or labelling could cause harm to the health of a consumer.</p> <p>We consider that the principles of the GSLPF must be respected, according to the parameters of numerals 3 and 4 of the GSLPF as indicated in Section 4.2.1.4. Where it is not possible to provide adequate information on the presence of an allergen by means of labelling, the food containing the allergen shall not be placed on the market.</p> <p>Furthermore, and in accordance with principle 3 of this draft guideline: Food information described or presented using technology shall not conflict with the information provided on the label or labelling of the prepackaged food, even when displayed in different languages.</p>	<b>Honduras</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p> <p>ICGA suggests the complete removing of this principle as consumers around the world may have differing views about what may constitute an information needed to make an informed purchasing decision.</p>	<b>ICGA</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p> <p>ICA suggests removing this principle as consumers may have differing views on what constitutes the information needed to make an informed purchasing decision</p>	<b>International Confectionery Association</b>
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>FIVS is concerned about this principle as it negates the interest of using electronic means for food labelling. In the case of alcohol beverages, ingredient and nutrition labelling will become mandatory in the EU on 08 December 2023, either on label or via electronic means, which could contradict this principle.</p>	<b>FIVS</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p> <p>Chile suggests deleting Principle 5.4, because it would be difficult to ensure compliance given that consumers have different views on what constitutes the information required to make an "informed purchase decision" and on the other hand, section 5.3 accounts for of what is meant in 5.4</p>	<b>Chile</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p>	<b>ICGMA</b>



SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>We suggest removing Principle 5.4. It would be difficult to ensure compliance since consumers may have differing views on what constitutes the information needed to make an informed purchasing decision.</p>	
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>ISDI suggests removing Principle 5.4. It would be difficult to ensure compliance since consumers may have differing views on what constitutes the information needed to make an informed purchasing decision.</p> <p>If principle 5.4 is not removed, ISDI recommends modifying it to be more specific about what types of food information is deemed necessary at the time of sale of the physical product to make an informed decision.</p>	<p><b>International Special Dietary Food Industries</b></p>
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>At EFA we believe that this provision needs further clarification, because the way it is written now it might be misleading. For example, regarding the clause that 'food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology', does this indicate an exclusivity of technology or not?</p>	<p><b>European Federation of Allergy and Airways Diseases Patients' Associations</b></p>
<p><del>Food-This information that is shall not be necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p>	<p><b>European Union</b></p>
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>New Zealand does not support the inclusion of 5(4). 5(4) goes against the stated purpose of section 5 that being to guide governments on when it may be appropriate for food Information required to be shown on a label or labelling of a prepackaged food to be replaced using technology. If the conditions 5(1) and 5(2) are met, any information provided via technology should be available to consumers at the point of purchase therefore rendering 5(4) redundant.</p>	<p><b>New Zealand</b></p>
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>FIA suggests being more specific with the types of information that mandatory on the physical label as it would be difficult to comply since consumers may have differing views on what constitutes the information needed to make an informed purchasing decision.</p>	<p><b>Food Industry Asia</b></p>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p> <p>Brazilian comments: This provision is subjective. It does not make it clear which information would be required to allow consumers to make an informed purchasing decision and which one would meet consumer's information needs. So, we suggest deleting this principle.</p>	<p><b>Brazil</b></p>

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</p> <p>"Food information that enables informed purchasing decision" is not clear. Most information specified in CXS 1-1985 are serving this purpose. If possible, we would like to suggest adding examples of information that may be classified into this section.</p>	<b>Thailand</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs if provided during the use of the product may be eligible to be provided using technology.</del></p> <p>ICBA suggests removal of Principle 5.4 as it would be difficult to comply since consumers may have differing views on what constitutes the information needed to make an informed purchasing decision.</p>	<b>ICBA</b>
<p>It is suggested to delete point 4 as it would be difficult to comply with as consumers may have different views on what constitutes the information needed to make an informed purchasing decision.</p>	<b>Argentina</b>
<p>We suggest dividing the ideas in this paragraph, starting from "Food information, which meets the information needs of the consumer, for the use of the product, can be offered using technology."</p>	<b>Honduras</b>
<p><del>Food information that is necessary at the time of sale of the physical product to make an informed purchasing decision should not be provided exclusively using technology. However, food information that would meet the consumer's information needs, if provided during the use of the product, may be eligible to be offered using technology.</del></p> <p>Chile suggests deleting Principle 5.4, because it would be difficult to ensure compliance given that consumers have different views regarding what constitutes the information required to make an "informed purchasing decision" and, on the other hand, section 5.3 gives an account of what is meant in 5.4</p>	<b>Chile</b>
<p><del>Food-This information that relates to a shall not be specific to an individual physical product (e.g. lot code, best before date) should not be provided using technology if doing so in a way that its absence on the label would compromise the ability to relate the information to the individual product.</del></p>	<b>European Union</b>
<p>As per our general comments New Zealand considers that date marking information and lot identification should never be provided exclusively using technology as this information is specific to the individual purchased product and it is not practical to provide this unique information via technology. We have captured this concept with our suggested changes at the beginning of section 5.</p>	<b>New Zealand</b>
<p>Since this section relates to Sections 3 and 4. If the above sections are modified, this section may also be taken into consideration for further clarity.</p>	<b>Thailand</b>
<p>We suggest improving the wording so that it can be read in a more clear manner regarding the idea, or eliminating the paragraph since it is contradictory to the principles of the guideline and the GSLPF as it must be clear if numeral 4 of the GSLPF will be mandatory.</p>	<b>Honduras</b>
<p>CGA could support the inclusion of principle 5.6 that technology may be an appropriate mechanism to provide consumers with food information in specific situations such as small package size. For clarity on the applicability of this principle, ICGA respectfully suggests that CCFL decides to add a footnote to refer back to the same exemptions as outlined in section 6 of the GSLPF (CXS 1).</p>	<b>ICGA</b>
<p>In the case of food information that would normally be required on the label if not for certain constraints, such as the size or nature of the <del>package, package</del><sup>(4)</sup>, consideration should be given to the use of technology to provide consumers with access to that information. <u>INSERT FOOTNOTE 4: "Outlined in section 6 of the Codex General Standards for Labelling of Package Foods (GSLPF)"</u></p>	<b>International Confectionery Association</b>

SPECIFIC COMMENTS	MEMBER / OBSERVER
ICA supports the inclusion of principle 5.6 that technology may be an appropriate mechanism to provide consumers with food information in specific situations such as small package size. For clarity on the applicability of this principle, ICA suggests the Committee add a footnote to refer back to exemptions outlined in section 6 of the GSLPF.	
<p>In the case of food information that would normally be required on the label if not for certain constraints, such as <u>for products where the size or nature of largest surface area is less than 10 cm<sup>2</sup> that may be exempted from the packaging requirements of paragraphs 4.2 and 4.6 to 4.8 of GSLPF in line with section 6 of GSLPF</u>, consideration should be given to the use of technology to provide consumers with access to that information.</p> <p>We support the inclusion of principle 5.6 and agree that technology may be an appropriate mechanism to provide consumers with food information in specific situations such as small package size. For clarity on the applicability of this principle, however, we suggest adding reference to exemptions outlined in section 6 of the GSLPF.</p>	ICGMA
<del>In the case of food information that would normally be required on the label if not for certain constraints, such as the size or nature of the package, consideration should be given to the use of technology to provide consumers with access to that information.</del>	European Union
<p>In the case of food information that would normally be required on the label if not for certain constraints, such as the size or nature of the package, consideration should be given to the use of technology to provide consumers with access to that information.</p> <p>New Zealand considers that provision of information via technology in such circumstances as described in 5(6) is possible now and therefore we consider 5(6) is not needed.</p>	New Zealand
<p>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</p> <p>EFA believes that, with regards to information concerning health and safety, such exemptions must not lead to the provision of information exclusively by digital means. Further clarification is needed in this provision.</p>	European Federation of Allergy and Airways Diseases Patients' Associations
<del>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</del>	European Union
<p>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</p> <p>New Zealand supports 5(7)</p>	New Zealand
<p><del>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</del></p> <p>Brazilian comments: This principle is too broad and does not clarify which temporary exemptions would be covered. In addition, Brazil notes that a discussion paper on labelling exemptions in emergency situations is expected to be discussed as item 10 of the 47CCFL Agenda. In this sense, Brazil understands that this principle is premature and should be excluded.</p>	Brazil
<p>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</p> <p>No reference should be made to particular cases such as the reference to "such as in the case of emergency situations", since countries may have a number of exceptional cases to consider.</p>	Argentina

SPECIFIC COMMENTS	MEMBER / OBSERVER
<p>Proposed text:</p> <p>(7) In the case of food information that is normally required on the label but for which temporary exemptions have been granted, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</p>	
<p><del>In the case of food information that is normally required on the label but for which temporary exemptions have been granted, such as in the case of emergency situations, consideration should be given to the use of technology to provide consumers with access to that information for the duration of the temporary exemption.</del></p> <p>We do not consider this section necessary and we request to delete it</p>	<b>Honduras</b>
<p><del>In the case of food labelling information that is not accessible under all conditions of sale (such as a vending machine) or by all demographics of consumers (such as those with visual impairments), consideration should be given to the use of technology to facilitate consumer access to that information.</del></p>	<b>European Union</b>
<p>In the case of food labelling information that is not accessible under all conditions of sale (such as a vending machine) or by all demographics of consumers (such as those with visual impairments), consideration should be given to the use of technology to facilitate consumer access to that information.</p> <p>New Zealand does not support the inclusion of this condition in Section 5. This does not relate to determining when required food information could be replaced using technology. Provision of information via technology in such circumstances as described in 5(8) is permitted now so long as the information is also on the label/labelling</p>	<b>New Zealand</b>
<p>In the case of food labelling information that is not accessible under all conditions of sale <del>(such as a vending machine)</del> or by all demographic groups of consumers <del>(such as those with visual impairments)</del>, the consideration should be given to the use of technology to facilitate consumer access to that information.</p> <p>We suggest replacing the text with "with special needs"</p>	<b>Honduras</b>