

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4.13

CX/CAC 24/47/15 Add.1

November 2024

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-seventh Session

Geneva, Switzerland, CIGG

25-30 November 2024

COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 48TH SESSION OF THE CODEX COMMITTEE ON FOOD LABELLING FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 8 and 5 of the Procedure and other matters as indicated in the relevant Circular Letter ([CL 2024/88-CAC](#)). The comments are those received through the Codex Online Commenting Systems (OCS)¹, or via email by the time this document was issued. The comments are as shown in Appendix I.

EXPLANATORY NOTES ON APPENDICES I AND II

2. The comments received are presented in a table format, with two columns as follows:
 - **First column** – Presents the comments with the rationale.
 - **Second column** – Presents the provider of the comments (name of member or observer)

¹ OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

REQUEST FOR COMMENTS ON THE STANDARDS AND RELATED TEXTS SUBMITTED BY CCFL48
COMMENTS IN REPLY TO CL 2024/88-CAC

*Comments by Brazil, Burundi, Costa Rica, Egypt, Iraq,
Japan, New Zealand, Saudi Arabia, Thailand, and United Kingdom*

COMMENT	MEMBER
Costa Rica considers texts ready for adoption.	Costa Rica
Egypt appreciates the work which is done in the document and agrees on the adoption of the below texts	Egypt
Agree	Iraq
Revision to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Provisions relevant to allergen labelling Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce Guidelines on the use of technology to provide food information in food labelling (at Step 8)	
<p>Brazil would like to thank you for the opportunity to present comments on the Standard and Guidelines submitted by the CCFL48 for adoption by the CAC47.</p> <p>Brazil supports the adoption at Step 8 of the three texts forwarded by the CCFL48:</p> <p>i) Revision to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Provisions relevant to allergen labelling;</p> <p>ii) Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce; and</p> <p>iii) Guidelines on the use of technology to provide food information in food labelling.</p> <p>These documents were extensively discussed within CCFL, and they will help ensure that consumers receive appropriate information to make informed food choices, contributing to health protection and fair trade practices.</p>	Brazil
<p>Burundi (i) supports the adoption of the draft revision to the General standard for the labelling of pre-packaged foods (CXS 1-1985): provisions relevant to allergen labelling by CAC47 at Step 8 (Appendix II); and</p> <p>(ii) is in agreement that CAC48 inform CCFH of the completion of the revisions in particular the definitions and the new list of foods or ingredients that should be declared on a label to ensure consistency with the Code of practice on allergen management for food business operators (CXC 80–2020).</p> <p>Burundi supports the adoption at Step 8 of the draft guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce by CAC47 (Appendix IV).</p> <p>Burundi supports the adoption at Step 8 of the Guidelines on the use of technology to provide food information in food labelling by CAC47 (Appendix V).</p>	Burundi
<p>New Zealand supports the adoption of all three standards at step 8 namely:</p> <p>(i) Revision to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Provisions relevant to allergen labelling</p>	New Zealand

<p>(ii) Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce (iii) Guidelines on the use of technology to provide food information in food labelling</p> <p>The wording for some clauses in all three texts has been the result of considerable discussion and significant compromise at the CCFL. It is therefore critical that the detail of these standards is not opened up for further discussion at the CAC.</p>	
<p>Revision to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Provisions relevant to allergen labelling Saudi Arabia supports the adoption of this document at step 8.</p> <p>Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce Saudi Arabia supports the adoption of this document at step 8.</p> <p>Guidelines on the use of technology to provide food information in food labelling Saudi Arabia supports the adoption of this document at step 8.</p>	Saudi Arabia
<p>Thailand does not object the adoption of the three proposed texts at step 8.</p>	Thailand
<p>Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce</p>	
<p>Japan supports the adoption of these guidelines. Simply from a grammatical perspective, we would just like propose following editorial corrections.</p> <ol style="list-style-type: none"> 1. Remove “at” before “the point of delivery” in Section 6.2. 2. To reflect the correction above, remove “At” before “the point of delivery” in Section 3 Definition, too. 	Japan
<p>Only comment would be a grammatical one for Section 3 - Definitions And whether 'At the point of delivery' should be updated to 'The point of delivery'</p>	United Kingdom
<p>Annex to General standard for the labelling of pre-packaged foods (CXS 1-1985): Guidelines on the use of precautionary allergen labelling (at Step 5)</p>	
<p>In relation to the adoption at Step 5 of the Guidelines on the Use of Precautionary Allergen Labelling, Brazil would like to note that several inputs will be necessary prior to CCFL49 to support its finalization by the Committee, such as advice from CCMAS on suitable methods of analysis and FAO/WHO scientific advice on reference doses (RfDs) or concentrations for cereals containing gluten, along with guidance on qualitative risk assessment.</p> <p>Nevertheless, Brazil recognizes the significant progress made on the document at CCFL48 and agrees with its adoption at Step 5.</p>	Brazil
<p>Burundi supports the adoption at Step 5 of the Guidelines on the use of precautionary allergen labelling by CAC47 (Appendix III).</p>	Burundi
<p>New Zealand also supports the progression of the Annex to General standard for the labelling of pre-packaged foods (CXS 1-1985): Guidelines on the use of precautionary allergen labelling and its adoption at Step 5.</p>	New Zealand
<p>Annex to <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Guidelines on the use of precautionary allergen labelling Saudi Arabia supports the adoption of this document at step 5.</p>	Saudi Arabia