

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 12

CX/FL 23/47/12 Add.1

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-seventh Session

Palais des Congrès, Gatineau, Canada

15 – 19 May 2023

DISCUSSION PAPER ON SUSTAINABILITY LABELLING CLAIMS

Comments in reply to CL 2023/16/OCS-FL

Comments of Australia, Brazil, Canada, Colombia, Costa Rica, Cuba, Ecuador, Egypt, European Union, Grenada, Guatemala, Honduras, Indonesia, Japan, Kenya, Morocco, New Zealand, Norway, Panama, Paraguay, Peru, Saudi Arabia, Singapore, South Africa, United Kingdom, Uruguay, USA, Zambia, EFAD, ENCA, FIVS, Food Industry Asia, FoodDrinkEurope, ICBA, ICGMA, ICUMSA, IDF/FIL, IBFAN, IFIF, IFU and WPHNA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/16/OCS-FL issued in February 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>Brazil would like to express its gratitude to New Zealand and to the European Union for preparing the discussion paper on sustainability labelling claims, CX/FL 23/47/12. We appreciate the opportunity to provide comments on the proposal of new work.</p> <p>Firstly, we would like to highlight that sustainability of food systems is of utmost significance to Brazil. The country is fully committed to adopting measures that contribute towards the attainment of the United Nations Sustainable Development Goals.</p> <p>As highlighted in CX/FL 23/47/12, there is a considerable number and diversity of sustainability-related labeling initiatives based on varying attributes and criteria, with limited government involvement given that most of these initiatives are privately owned.</p> <p>In this regard, Brazil acknowledges that other international organizations, such as the United Nations Forum on Sustainability Standards (UNFSS) and the International Organization for Standardization (ISO), are already committed to monitoring and improving the adoption of Voluntary Sustainability Standards (VSS) (1) that include labelling initiatives, as a means of contributing to the UN Sustainable Development Goals.</p> <p>Additionally, we believe that the General Guideline on Claims (CXG 1-1979) is comprehensive enough to provide guidance to aid governments and other relevant stakeholders in developing, implementing, and regulating sustainability-related labelling.</p> <p>Furthermore, we comprehend that the proposed new work to establish high-level principles for sustainability related labeling falls outside the mandate of Codex Alimentarius, as defined in the General Principles of Codex Alimentarius of the Procedural Manual. This initiative does not aim to protect consumers' health, nor will it be able to ensure fair practices in food trade.</p> <p>Additionally, this initiative has the potential to encourage the proliferation of sustainability claims and create barriers to international trade, which runs contrary to the principles of the organization. It could have particularly negative impacts on developing countries, which would bear a greater burden in maintaining international trade with their partners due to rising production costs required to meet non-sanitary requirements.</p> <p>In light of the above, Brazil does not agree to initiate new work to establish high-level principles for the use of sustainability claims in food labeling.</p> <p>(1) As per the UNFSS definition, VSS are standards that specify the requirements that producers, traders, manufacturers, retailers or service providers may be asked to meet, relating to a wide range of sustainability metrics including respect for basic human rights, worker health and safety, the environmental impacts of production, community relations, land use planning, and others.</p>	<p>Brazil</p>
<p>Canada thanks New Zealand and the European Union for the development of the discussion paper exploring whether there is a need for new work by CCFL on sustainability claims. Canada recognizes the importance of sustainability and the linkages between sustainability and food production. Sustainable agriculture production is a topic currently under discussion in a number of international fora.</p> <p>Canada is continuing to review this work proposal and would like to raise the following considerations at this time:</p>	<p>Canada</p>

<p>It is acknowledged that there is already sustainability-related labelling being applied to foods, most of which is developed by the private sector, and it is anticipated that this will continue to increase. Sustainability-related food labelling meets the definition of a claim in Section 2 of the General Guidelines on Claims (CAC/GL 1-1979). This definition is broad in scope.</p> <p>As stated in the Discussion Paper, Codex's mission is to 'protect consumer health and promote fair practices in food trade by setting international science-based food safety and quality standards'. Many of the characteristics that are covered by sustainability-related food labelling go beyond safety and quality standards.</p> <p>Sustainability is a broad term that encompasses elements beyond the mandate of CCFL and of Codex. For example, the appropriate use of environmental claims in relation to packaging or production practices is a topic that could affect both food and other consumer goods. There are likely other international bodies or expert committees that are better placed as authorities to determine what sustainability means in various contexts, whether related to fisheries sustainability, packaging, land use, harvesting, carbon footprint in manufacturing, etc. Such bodies may be able to develop specific criteria for sustainability-related claims that apply to a variety of consumer goods including food.</p> <p>Any consideration of new work must be scoped within the role of CCFL and be relevant for the health protection of consumers and/or for the promotion of fair trade practices for food. Given the breadth of sustainability, where it intersects with the role of CCFL must be carefully considered. Specific guidance would not be appropriate for CCFL to establish as there is a likelihood that it could go beyond the realm and expertise of Codex. It is noted that the draft project document refers to sustainability labelling in general and does not specify that it would be limited to food labelling.</p> <p>High level principles and guidance on what is considered meaningful and substantiated with respect to sustainability labelling on food may have the potential of applying equally to other types of claims. In other words, there may be challenges scoping this work to sustainability-related food labelling, while remaining within the remit of CCFL, without inadvertently encompassing other types of consumer values claims.</p> <p>Canada suggests that these factors should be considered as CCFL determines whether to initiate new work on this topic.</p>	
<p>Comentarios Generales:</p> <p>Costa Rica entiende que es esencial que la industria siga innovando y liderando las prácticas de fabricación ambientalmente sostenibles que reduzcan la huella ambiental, y con este fin, se tiene una amplia variedad de iniciativas que abordan la sostenibilidad en toda la cadena de suministro. Para reflejar estas iniciativas, gran cantidad de productos pueden llevar una variedad de etiquetas y declaraciones que reflejan aspectos de la sostenibilidad medioambiental, a menudo con respecto al embalaje (por ejemplo, mensajes de contenido reciclado) y a veces con respecto a una combinación de compromisos medioambientales y sociales o económicos.</p> <p>No obstante, se debe tener claro desde el principio que la información sobre sostenibilidad en la unidad de producción no siempre es aplicable o trasladable de forma directa al producto, en especial con lo relativo a la sostenibilidad ambiental. El realizar acciones de sostenibilidad ambiental en la unidad de producción y trasladarlas de forma automática al producto sin un análisis de su relación directa con la mayor sostenibilidad del producto, es un error que se comete muy frecuentemente (no todas las supuestas acciones de sostenibilidad ambiental realizadas en una unidad productiva van a tener un impacto directo en la sostenibilidad del producto).</p> <p>Si lo que se quiere es que los consumidores entiendan y comparen atributos ambientales entre diversos productos, con una misma base comparativa y basados en datos científicos, lo que se debe hacer es informar sobre las huellas ambientales de esos productos sobre la base de un análisis de ciclo de vida estandarizado. Cualquier otro tipo de información de</p>	<p>Costa Rica</p>

<p>sostenibilidad ambiental no va a tener una base científica lo suficientemente robusta para eliminar la subjetividad, hacer comparaciones válidas científicamente y por lo tanto podría causar confusión en los consumidores.</p> <p>Por tanto, se deben reconocer solo los etiquetados de sostenibilidad ambiental con una sólida base científica, con reconocimiento ambiental internacional o nacional a nivel oficial y preferiblemente con evaluación de tercera parte independiente, para eliminar el conflicto de interés de partes interesadas en la promoción de determinados productos independientemente de sus atributos ambientales para evitar promover el Green Washing (maquillaje verde).</p> <p>Un buen punto de partida para iniciar trabajos en el tema de la sostenibilidad ambiental de productos alimenticios y su comunicación hacia los consumidores podría ser el programa de Europa sobre la huella ambiental de producto (PEF). Este programa europeo se basa en la huella ambiental obtenida mediante el análisis de ciclo de vida estandarizado y brinda una base robusta para hacer comparaciones de sostenibilidad ambiental válidas entre productos. Si se va a trabajar con el análisis de ciclo de vida, es importante incorporar la normativa internacional ampliamente reconocida en este tema, como lo pueden ser las normas ISO. El crear normativa paralela o sustitutiva puede incrementar la confusión de los consumidores.</p>	
<p>Cuba agradece la oportunidad de emitir criterios sobre la propuesta de esta carta circular CL 2023/16/OCS-FL Solicitud de observaciones sobre el documento de debate sobre declaraciones de propiedades de sostenibilidad en el etiquetado. Consideramos pertinente que la Comisión del Codex Alimentarius apruebe el inicio de un nuevo trabajo, por cuanto se consideran las dimensiones ambientales, sociales y económicas.</p>	Cuba
<p>ENCA considers it of great importance to address the global impact of food production on greenhouse gas emissions and its impact on climate change, biodiversity, labour practices, protection of agricultural land and animal welfare. [1], [2] However, it is critically important that any efforts by Codex to improve or transform the Food System on the basis of a One Health Approach, as called for by Dr Tedros, must be: human rights based, must not mask problems that need to be addressed; must not undermine food security; must not further exacerbate an already broken, harmful food system and must not facilitate the trade of harmful ultra-processed products</p> <p>The current practice of sustainability labelling as noted by the submissions of member States and Observers to the Circular letter CL2022/12FL in the stocktake summary shows that 82% of the already implemented labels were privately owned, 66% were verified by a third (non-government) party and only 12% by government and/or public institutions. Non-government-regulated labelling was often reported as misleading.</p> <p>The lack of government regulation on sustainability labelling and the predominance of food industry and self-regulated certification labelling schemes leads to unsubstantiated claims and “green washing” being used to promote product consumption and increase market share.</p> <p>It is ENCA’s long experience that nutrition and health claims are rarely based on credible science and invariably misleading. When used to promote foods for infants and young children such labelling is especially deceptive and undermining of breastfeeding and WHO recommendations for optimal infant and young child feeding. Such claims put maternal, infant and young child health at risk and are forbidden by World Health Assembly Resolutions.[3]</p> <p>If national Governments are to permit sustainability labelling, it is essential that warnings, rather than claims are prioritised, especially in relation to pre-packaged ultra-processed products.</p> <p>Codex Guidelines should encourage governments to follow several key principles to encourage fair, comparable and truthful labelling:</p> <p><input type="checkbox"/> Adequate, effective, legally binding and independently monitored safeguards must first be in place to ensure that</p>	ENCA

human and planetary health is not undermined by misleading claims.

- The onus for reducing the impact of food systems on climate change should not be placed on consumers.
- Governments primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics and curb the silent pandemic of antimicrobial resistance.

The Independently verified impact of ALL the factors that contribute to food production and food consumption (“from farm to fork”) should be used as criteria and they must include as a minimum:

- water consumption along the whole production chain
- source of ingredients – local or imported
- processing of ingredients and of the final product
- environmental cost of the global supply chain
- global, regional and national transportation
- packaging – plastics – microplastics, chemicals such as PFAs that also cause soil pollution (cadmium and toxic heavy metals) [4]
- labour practices
- animal health
- retailing, marketing and promotion

The need for Government regulation

ENCA is of the opinion that any sustainability labelling must be government regulated and that private/commercial/industry self-regulated and certified claims should not be permitted.

The resources needed to legislate, enforce, monitor and substantiate sustainability claims and warnings effectively will be costly. In many cases this will be a counter-productive, wasteful and will utilize critical public health resources to facilitate the needs of the processed food industry rather, than bring about the “transformation of the world’s food systems [that] is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet”

In countries where effective regulation is not a viable option, sustainability labelling should not be permitted.

It is critically important that sustainability labelling must not be permitted for commercial milk formulas or foods for infants and young children to the age of 5 years. The risks of a sustainability claim being misleading are too great.

Notes:

– Can lessons be learned and the UPF trade controlled? IBFAN Statement. November 2022.

[2] Nature Climate Change, Ivanovich et al. further confirm in their Analysis article that global food consumption can add nearly 1 °C to warming by the end of this century, driven by foods that are high sources of methane, such as beef, dairy and rice..Modern food emissions. Nat. Clim. Chang.(2023). <https://doi.org/10.1038/s41558-023-01643-2>

[3] 2010 WHA 63.23 urged Member States to: “end inappropriate promotion of food for infants and young children and to ensure that nutrition and health claims shall not be permitted for foods for infants and young children, except where specifically provided for, in relevant Codex Alimentarius standards or national legislation”WHA58.32: Urges Member States (3) to ensure that clinicians and other health-care personnel, community health workers and families, parents and other caregivers, particularly of infants at high risk, are provided with enough information and training by health-care providers, in a timely manner on the preparation, use and handling of powdered infant formula in order to minimize health hazards; are informed that powdered infant formula may contain pathogenic microorganisms and must be prepared and used appropriately; and, where

<p>applicable, that this information is conveyed through an explicit warning on packaging; WHA61.20 2008 Urges Member states. (3) to implement, through application and wide dissemination, the WHO/FAO guidelines on safe preparation, storage and handling of powdered infant formula in order to minimize the risk of bacterial infection and, in particular, ensure that the labelling of powdered formula conforms with the standards, guidelines and recommendations of the Codex Alimentarius Commission and taking into account resolution WHA58.32</p> <p>[4] Waste disposal and the burning of rubbish increases methane emissions. "Plastics do not fully decompose and instead just continually break down into smaller and smaller pieces called microplastics. These microplastics pose a huge risk to wildlife and are extremely difficult to clean up. ... The best way to reduce the impact of single-use plastics on climate change is to stop using this type of plastic. https://www.colorado.edu/ecenter/2021/02/25/climate-impact-single-use-plastics</p>	
<p>FIVS is a global trade federation for the alcohol beverage industry since 1951. We are committed to providing a venue and developing tools to encourage social, environmental, and economic sustainability among our members and the wider sector, in keeping with the United Nations Sustainable Development Goals. Our membership includes producers, importers, exporters, and trade associations (currently accounting for 75% of the wine traded globally). We also welcome and collaborate effectively with affiliates from allied industries.</p> <p>FIVS welcomes the opportunity to comment on the Discussions paper on sustainability labelling claims.</p>	FIVS
<p>FIA views that it is important to consider which aspects of sustainability labelling fall within the mandate of CCFL, as well as the degree of maturity of each aspect of sustainability.</p> <p>With the diverse growth of sustainability-related claims, FIA views that it would be essential to include the definition of "Sustainability" to clearly outline the scope and aspects of sustainability that will warrant the use of a sustainability-related claim.</p>	Food Industry Asia
<p>The International Dairy Federation (IDF) notes with interest the proposal by the Codex Committee on Food Labeling to develop guidelines on sustainability labelling claims. Achieving healthy diets/dietary pattern produced sustainably relies on a balance between nutrition, environment, social, cultural, and economic aspects. In line with the FAO Guiding Principles on sustainable healthy diets, consideration must be given to how sustainability is defined and, as such, be aligned with the FAO Guiding principles giving regard to all four domains: environment, social, economic and cultural . Recognizing the broad scope of the term 'sustainability', IDF consider it necessary to define the term 'sustainability-related labelling'. This will support the progression of guidelines that are fit for purpose and ensures all members have the same understanding of 'sustainability'. IDF considers that should scope be limited, 'environmental' sustainability labelling is most appropriate for progression based on current consumer need for information. IDF agree that CCFL work should be limited to high-level guidance and principles for developing sustainability-related labelling on food.</p>	IDF
<p>Indonesia wishes to thank New Zealand and the European Union for preparing discussion paper on sustainability labelling claims. Accordingly, Indonesia supports that CCFL should initiate new work on sustainability-related labelling and agrees that such work should be limited to high-level guidance and principles with covers the following aspects:</p> <ul style="list-style-type: none"> • Purpose • Scope • Definition of sustainability-related labelling (if required and appropriate) • General principles for sustainability-related labelling 	Indonesia

<p>IBFAN comment Proposal for New Work on Sustainability related Labelling CX/FL 23/47/12 Appendix 1 January 2023</p> <p>“You meet at time of unprecedented challenges. Conflicts and climate change are exacerbating food insecurity and malnutrition. Most people around the world who have access to food cannot afford healthy diets. Deforestation and habitat loss are increasing the risk of zoonotic pathogens. Anti-Microbial Resistance, environmental contamination and degradation, occupational hazards, unsafe and adulterated foods – the list goes on. A transformation of the world’s food systems is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet. The Codex Alimentarius has a critical role to play in guiding country regulations that promote health, while facilitating fair trade. WHO remains committed to working with FAO to develop and deliver high quality scientific advice and evidence-based global food food safety guidelines and standards.”</p> <p>Dr Tedros Adhanom Ghebreyesus, WHO Director-General welcome address:CAC45 “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” UN World Commission on Environment and Development: Our Common Future, 1987</p> <p>IBFAN considers it of great importance to address the global impact of food production on greenhouse gas emissions and its impact on climate change, biodiversity, labour practices, protection of agricultural land and animal welfare. , However, it is critically important that any efforts by Codex to improve or transform the Food System on the basis of a One Health Approach, as called for by Dr Tedros, must be: human rights based, must not mask problems that need to be addressed; must not undermine food security; must not further exacerbate an already broken, harmful food system and must not facilitate the trade of harmful ultra-processed products</p> <p>The current practice of sustainability labelling as noted by the submissions of member States and Observers to the Circular letter CL2022/12FL in the stocktake summary shows that 82% of the already implemented labels were privately owned, 66% were verified by a third (non-government) party and only 12% by government and/or public institutions. Non-government-regulated labelling was often reported as misleading.</p> <p>The lack of government regulation on sustainability labelling and the predominance of food industry and self-regulated certification labelling schemes leads to unsubstantiated claims and “green washing” being used to promote product consumption and increase market share.</p> <p>It is IBFAN's long experience that nutrition and health claims are rarely based on credible science and invariably misleading. When used to promote foods for infants and young children such labelling is especially deceptive and undermining of breastfeeding and WHO recommendations for optimal infant and young child feeding. Such claims put maternal, infant and young child health at risk and are forbidden by World Health Assembly Resolutions.</p> <p>If national Governments are to permit sustainability labelling, it is essential that warnings, rather than claims are prioritised, especially in relation to pre-packaged ultra-processed products.</p> <p>Codex Guidelines should encourage governments to follow several key principles to encourage fair, comparable and truthful labelling:</p> <ul style="list-style-type: none"> • Adequate, effective, legally binding and independently monitored safeguards must first be in place to ensure that human and planetary health is not undermined by misleading claims. • The onus for reducing the impact of food systems on climate change should not be placed on consumers. • Governments primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the 	<p>International Baby Food Action Network</p>
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<p>wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics and curb the silent pandemic of antimicrobial resistance.</p> <p>The Independently verified impact of ALL the factors that contribute to food production and food consumption (“from farm to fork”) should be used as criteria and they must include as a minimum:</p> <ul style="list-style-type: none"> • water consumption along the whole production chain • source of ingredients - local or imported • processing of ingredients • processing of the final product • environmental cost of the global supply chain • global, regional and national transportation • packaging - plastics – microplastics, chemicals such as PFAs • labour practices • animal health • retailing, marketing and promotion <p>The need for Government regulation</p> <p>IBFAN is of the opinion that any sustainability labelling must be government regulated and that private/commercial/industry self-regulated and certified claims should not be permitted.</p> <p>The resources needed to legislate, enforce, monitor and substantiate sustainability claims and warnings effectively will be costly. In many cases this will be a counter-productive, wasteful and will utilize critical public health resources to facilitate the needs of the processed food industry rather, than bring about the “transformation of the world’s food systems [that] is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet”</p> <p>In countries where effective regulation is not a viable option, sustainability labelling should not be permitted.</p> <p>It is critically important that sustainability labelling must not be permitted for commercial milk formulas or foods for infants and young children to the age of 5 years. The risks of a sustainability claim being misleading are too great.</p>	
<p>Kenya appreciates the work done by New Zealand and the European Union in the preparation of this project document. Kenya is looking forward to the discussions during CCFL47.</p>	Kenya
<p>Panamá, agradece el trabajo realizado por el comité CCFL y resalta la propuesta presentada en relación a los nuevos trabajos sobre etiquetado y su enfoque en la sostenibilidad.</p> <p>Esto fundamentado en los acuerdos internacionales con miras a fortalecer la ruta de cumplimiento de la agenda 20-30.</p> <p>Panama thanks the work carried out by the CCFL committee and highlights the proposal presented in relation to the new work on labeling and its focus on sustainability.</p> <p>This is based on international agreements with a view to strengthening the compliance path of the 20-30 agenda.</p>	Panama
<p>a. Si el Comité del Codex sobre Etiquetado de los Alimentos debería iniciar un nuevo trabajo sobre el etiquetado relativo a la sostenibilidad (¿el documento de debate ofrece información suficiente relacionada con la sostenibilidad para sustentar el nuevo trabajo?);</p>	Peru

<p>Comentario:</p> <p>La Comisión Técnica de Etiquetado de los Alimentos del Codex está a favor del iniciar un nuevo trabajo sobre el etiquetado relativo a la sostenibilidad. Consideramos que el documento base ofrece información completa para el desarrollo de la normativa propuesta.</p> <p>b. que dicha labor se debería limitar a orientaciones y principios de alto nivel para elaborar un etiquetado de los alimentos relativo a la sostenibilidad, y</p> <p>Comentario:</p> <p>La Comisión Técnica de Etiquetado de los Alimentos del Codex considera que debería de desarrollarse lineamientos generales sobre el etiquetado de los alimentos relativo a la sostenibilidad.</p> <p>c. cualesquiera otras observaciones para mejorar el documento de proyecto asociado: Propuesta de nuevo trabajo sobre etiquetado relativo a la sostenibilidad</p> <p>Comentario:</p> <p>A fin de facilitar el etiquetado relativo a la sostenibilidad se debe considerar la posibilidad de colocar una declaración/logo de sostenibilidad en la Norma.</p>	
<p>Singapore would like to thank New Zealand for putting up the discussion paper. Singapore agrees that it is important that the claims used on food products are not presented in a false, misleading or deceptive manner.</p> <p>Singapore supports New Zealand's proposal to develop high-level principles to provide guidance to member countries in the development, implementation and/or regulation of sustainability-related labelling. This will help to ensure that the sustainability claims used are not misleading, can be substantiated, and be meaningful to consumers in order to help them make informed purchasing decisions.</p> <p>In view of the diverse types of sustainability-related labelling, the guidance should remain high level, and not go into the prescriptive technical details, but with adequate guidance for countries and industry to develop their own guidelines or standards for sustainability-related labelling.</p>	Singapore
<p>We think that this is an important and timely piece of work that may help to reduce some of the current confusion and inconsistency surrounding existing labelling related to sustainability. We would welcome CCFL initiating further work in this area that encompasses environmental, economic and social values but agree that this work should be limited to high-level guidance and the underpinning principles. We would be happy to be involved in this work and further consultations.</p>	The European Federation of the Associations of Dietitians (EFAD)
<p>The United Kingdom would like to inquire about the use of the UN definition of sustainability. The definition refers to the 3 pillars - environment, social and economic - will labelling guidance relate to all of these?</p> <p>We would like to inquire about the extent to which a proliferation of sustainability-related labels is a 'consumer protection' issue? We believe this is limited to 'fair practices' concerns. The proliferation of diverse sustainability-related labels could itself create trade barriers.</p> <p>The United Kingdom would like to inquire further about the the requirement for technical knowledge. We note that even high level guidance may need to have a view of the technical aspects of sustainability labelling.</p>	United Kingdom

<p>The United Kingdom recognises the importance of sustainability and is committed to supporting consumers to make sustainable food choices. We welcome the opportunity to discuss and progress new work at Codex which should help standardise approaches to sustainability labelling and reduce trade barriers.</p>	
<p>Uruguay Agradece la oportunidad de enviar nuestros comentarios. Uruguay considera que no es necesario iniciar un nuevo trabajo sobre el etiquetado de sostenibilidad. Aun cuando la temática podría estar dentro del ámbito de competencia del comité, entendemos que el desarrollo de principios de alto nivel generaría mayor desigualdad en el comercio internacional y podría generar confusión en los consumidores al existir un bajo nivel de comprensión del concepto de sostenibilidad a nivel mundial.</p> <p>Reiteramos que la NGEAP contempla en sus principios generales que los alimentos "no deberán describirse ni presentarse con una etiqueta o etiquetado en una forma que sea falsa, equívoca o engañosa", y que las directrices sobre Declaraciones de propiedades aplican para este tipo de etiquetado, por lo que no sería necesario un trabajo específico para esta temática.</p>	<p>Uruguay</p>
<p>The United States thanks New Zealand and the European Union for the thoughtful discussion paper. The United States does not support the proposed new work. The topic of sustainability is very broad and extends beyond the scope and expertise of Codex. In addition, the proposed work would be duplicative of work being undertaken in other international organizations, as noted in our response to the requests for comments on existing labeling.</p> <p>Codex has a claims framework in the General Guidelines on Claims (CXG 1-1979) that can be applied to sustainability claims. If the current Guidelines are not suitable to guide criteria for substantiation and criteria to determine what is truthful and not misleading, then the United States would recommend the authors of the discussion paper consider proposing updates to the claims text in general rather than work specific to sustainability claims.</p>	<p>USA</p>
<p>“You meet at time of unprecedented challenges. Conflicts and climate change are exacerbating food insecurity and malnutrition. Most people around the world who have access to food cannot afford healthy diets. Deforestation and habitat loss are increasing the risk of zoonotic pathogens. Anti-Microbial Resistance, environmental contamination and degradation, occupational hazards, unsafe and adulterated foods – the list goes on. A transformation of the world’s food systems is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet. The Codex Alimentarius has a critical role to play in guiding country regulations that promote health, while facilitating fair trade. WHO remains committed to working with FAO to develop and deliver high quality scientific advice and evidence-based global food food safety guidelines and standards.”</p> <p>“meeting the needs of the present without compromising the ability of future generations to meet their own needs.”</p> <p>UN World Commission on Environment and Development: Our Common Future, 1987</p> <p>WPHNA supports many other organizations on the importance to reduce the impact food production and distribution have on global warming and production of greenhouse gases (1,2).</p> <p>WPHNA considers that the evidence presented in the Circular letter CL2022/12FL on the current practices shows that more than eighty percent of the implemented labels showing a product is sustainable were privately owned, and sixty percent were verified by a third party (non-government) and less than twelve by government and/or public institutions. According to the evidence provided, non-government-regulated labelling was often reported as misleading.</p> <p>An approach to sustainability labelling should come from the government and be regulated by them. The predominance of food industry and self-regulated labelling schemes leads to unsubstantiated claims and can lead self-compliance to dominate the</p>	<p>World Public Health Nutrition Association</p>

schemes, which have been proving to be misleading and inaccurate. Using a sustainability system could promote corporate social responsibility practices that can lead to “greenwashing” strategies, used to promote products that have negative impact on health, like ultra-processed foods, and that could be wrongly signalling a positive attribute confusing consumers, and increase profitability of such products (3).

If national Governments are to permit sustainability labelling, it is essential that warnings labels addressing high content of nutrients of concerns, and level of processing, especially in relation to pre-packaged ultra-processed products.

Codex Guidelines should encourage governments to follow several key principles to encourage fair, comparable and truthful labelling:

- Adequate, effective, legally binding and independently monitored safeguards must first be in place to ensure that human and planetary health is not undermined by misleading claims.
- The onus for reducing the impact of food systems on climate change should not be placed on consumers.
- Governments primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics and curb the silent pandemic of antimicrobial resistance.

The Independently verified impact of ALL the factors that contribute to food production and food consumption (“from farm to fork”) should be used as criteria and they must include as a minimum:

- water consumption along the whole production chain
- source of ingredients - local or imported
- processing of ingredients
- processing of the final product
- environmental cost of the global supply chain
- global, regional and national transportation
- packaging - plastics – microplastics, chemicals such as PFAs
- labour practices
- animal health
- retailing, marketing and promotion

WPHNA supports the opinion that any sustainability labelling must be government regulated and that private/commercial/industry self-regulated and certified claims should not be permitted.

The resources needed to legislate, enforce, monitor and substantiate sustainability claims and warnings effectively will be costly. In many cases this will be a counter-productive, wasteful and will utilize critical public health resources to facilitate the needs of the processed food industry rather, than bring about the “transformation of the world’s food systems [that] is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet” (4)

<p>In countries where effective regulation is not a viable option, sustainability labelling should not be permitted. It is critically important that sustainability labelling must not be permitted for commercial milk formulas or foods for infants and young children to the age of 5 years. The risks of a sustainability claim being misleading are too great.</p> <ol style="list-style-type: none"> 1. IBFAN Statement. November 2022. IBFAN Statement. November 2022. https://www.babymilkaction.org/wp-content/uploads/2022/11/IBFAN-comment-CAC45-Nov-2022-FINAL-Final.pdf 2. Nature Climate Change, Ivanovich et al Nature Climate Change, Nature Climate Change, Ivanovich et al https://www.nature.com/articles/s41558-023-01605-8 3. de Freitas Netto, S. V., Sobral, M. F. F., Ribeiro, A. R. B., & Soares, G. R. d. L. (2020). Concepts and forms of greenwashing: a systematic review. Environmental Sciences Europe, 32(1), 19. https://doi.org/10.1186/s12302-020-0300-3 4. Dr Tedros Adhanom Ghebreyesus, WHO Director-General welcome address:CAC45 	
<p>Zambia is in support of new work on sustainability -related labelling. As a country developing its Agro-food industry it is important that this standard once developed and adopted is domesticated and adopted into national legislation to guide food manufacturers on sustainability related claims and protect the health of the consumers. This standard once developed, will also contribute to preventing food fraud, misleading information and unfair trade among manufacturers both locally and internationally. The work should provide for high level guidance and principles for developing sustainability related claims.</p>	Zambia

SPECIFIC COMMENTS	MEMBER / OBSERVER
Comments on whether CCFL should initiate new work on sustainability-related labelling (does the discussion paper provide sufficient information to support new work);	
<p>Australia agrees that the paper provides sufficient justification to support new work on sustainability-related labelling. This work is timely given increasing consumer interest in sustainability and a proliferation of labelling claims in relation to sustainability, including in relation to food production, ingredients, and packaging.</p>	Australia
<p>FIVS does not support initiating new work on sustainability-related labelling within the scope of CCFL. FIVS believes this goes beyond Codex's mandate, which is to protect the health of consumers and ensure fair practices in the food trade. Sustainability is a much broader concept which goes beyond the well-defined scope of Codex, and would set a negative precedent and undermine Codex's credibility as a standard-setting organisation. In particular, Codex's adherence to science and risk-based for standard-setting is critical and should remain its focus when it comes to food safety, taking into account its limited financial and human resources. FIVS agrees that it is critical to ensure that consumers are not being misled with respect to the sustainability of the foods they are buying, however this in itself does not constitute a food safety issue. The proposal for new work on sustainability-related labelling risks moving into the territory of consumer behaviour, which is not within the scope of Codex.</p> <p>FIVS also believes that sustainability is already covered by a large number of international organisations that are better suited to address this topic within the remit of their mandate. Sustainability can be very much sector and country specific, therefore general Codex guidelines would not meaningfully contribute to this issue.</p>	FIVS

<p>Finally, if Codex wants to ensure that sustainability labelling meet the requirements of the General Guidelines on Claims (CXG 1-1979), it could look to update the guidelines by including sustainability under section 5.1.iii to ensure that sustainability claims are in accordance with the national practices of the country where the food is sold.</p>	
<p>ICGMA appreciates the interest of Codex in exploring how sustainability can be addressed in its workstreams, including this proposed work on sustainability claims.</p> <p>However, we believe it is premature to address sustainability considerations in Codex standards at CCFL and other technical committees before there is an overarching fundamental discussion and agreement from Members on whether and how Codex will include sustainability in its mandate, such as how sustainability-related standards development and adoption procedures will be kept consistent with the Codex commitment to science and risk-based standard setting. It is also important to understand how the Committees' work ladders up to the overarching mandate should facilitate more focused discussions and potentially faster text adoption, which align with Codex Strategic Goal 1.</p>	ICGMA
<p>IFU supports new work on sustainability labelling</p>	IFU
<p>South Africa supports the proposal to initiate new work on sustainability labelling claims.</p> <p>Rationale: The new work on sustainability labelling claims will help consumers to compare the sustainability of foods to be able to make informed choices, when buying food and also ensure fair trade.</p>	South Africa
<p>whether CCFL should initiate new work on sustainability-related labelling (<i>does the discussion paper provide sufficient information to support new work</i>);</p>	
<p>Australia agrees that high level principles would provide a useful basis for harmonization. Additionally, this would provide guidance for Member States if they wish to pursue policy or regulatory action within their countries.</p>	Australia
<p>Dentro de los criterios de priorización para las nuevas propuestas de trabajo se incluye: "Protección del consumidor desde el punto de vista de la salud, la inocuidad de los alimentos, el asegurar prácticas equitativas en el comercio de los alimentos y tomar en cuenta las necesidades identificadas de los países en desarrollo.", el etiquetado de sostenibilidad no se relaciona directamente a la inocuidad y calidad de los alimentos, sin embargo, si puede impactar el comercio de alimentos. Se podría adelantar un nuevo trabajo en torno al etiquetado de sostenibilidad que se relacione directamente a la inocuidad y calidad de alimentos, con el fin de asegurar prácticas equitativas en el comercio y una elección informada en los consumidores.</p>	Colombia
<p>Costa Rica aprecia el interés del Codex en explorar cómo se puede abordar la sostenibilidad en sus líneas de trabajo, incluida esta labor propuesta sobre declaraciones de sostenibilidad y en ese sentido, quisiera externar los siguientes comentarios:</p> <p>Es indiscutible que para dar cumplimiento al Plan Estratégico 2020-2025 del Codex se debe impulsar un enfoque de proactividad en los trabajos futuros a fin de atender de manera efectiva las necesidades de sus países miembros y observadores en el menor tiempo posible y para el caso que nos ocupa, en cumplimiento al compromiso adquirido para contribuir con el cumplimiento de los ODS. No obstante, Costa Rica considera que los temas relacionados con la sostenibilidad no se relacionan con los objetivos específicos del Codex, por ello, considera determinante validar si los trabajos que ya están llevando a cabo otras organizaciones internacionales, se pueden complementar con los trabajos del Codex.</p> <p>Por lo indicado y en aras de avanzar por el camino que le corresponde al Codex, considera necesario llevar a cabo primero un debate fundamental general y un acuerdo de los Miembros para definir la "sostenibilidad" en el contexto del Codex para que el</p>	Costa Rica

<p>CCFL pueda entender cómo encaja su mandato dentro de la definición y sobre la forma en que los procedimientos de elaboración y adopción de normas relacionadas con la sostenibilidad se mantendrán en consonancia con el compromiso del Codex con la ciencia y el establecimiento de normas basadas en el riesgo.</p>	
<p>Después de haber analizado el documento de debate sobre declaraciones de propiedades de sostenibilidad en el etiquetado CX/FL 23/47/12, Ecuador considera que el Comité del Codex sobre Etiquetado de los Alimentos, sí, debería iniciar un nuevo trabajo sobre el etiquetado relativo a la sostenibilidad, ya que, permite involucrar al país en una nueva estrategia de regulación en el campo de la sostenibilidad, permitiendo ampliar la información al consumidor al momento de la adquisición de un alimento y a su vez, impulsará la demanda de alimentos sostenibles; puede también, convertirse en una herramienta importante para impulsar prácticas que mejoren la sostenibilidad de los sistemas alimentarios y su fiabilidad tenga efectos significativos en las prácticas equitativas en el comercio.</p> <p>El país considera también, que el etiquetado relativo a la sostenibilidad es un proceso complejo que implica la identificación gráfica y escrita de los impactos ambientales, sociales y económicos, que se conjugan en toda la cadena de producción alimentaria, desde la etapa primaria hasta la comercialización de alimentos procesados.</p> <p>El desarrollar, implementar y regular el etiquetado relativo a la sostenibilidad puede ser un desafío, con la definición de criterios de sostenibilidad claros y mensurables, la identificación técnica de los productos que se etiquetarán y la selección de la metodología de evaluación.</p> <p>Consideramos además que, una vez desarrollado el etiquetado relativo a la sostenibilidad, se deberá, implementarlo de manera eficaz, con la creación de un sistema de vigilancia y control efectivo; la identificación de los organismos que serán responsables de su cumplimiento y la gestión del etiquetado y promoción a los consumidores y población en general.</p> <p>La regulación del etiquetado garantizará que los productos etiquetados con criterios de sostenibilidad definidos, puedan evitar la confusión, el engaño y la falacia a los consumidores.</p>	<p>Ecuador</p>
<p>CCFL initiate a good new work on sustainability-related labelling but Egypt considers the discussion paper needs to provide more information to support new work: The project document should provide a clear understanding of the scope and objectives of the project. This will help the project team to stay focused and achieve the desired outcomes. The document should outline the specific types of food products that will be targeted, the sustainability criteria that will be used to determine labelling, and the ultimate goal of the project.</p>	<p>Egypt</p>
<p>The EUMS are in favour of Codex work on the development of guidance that would assist governments (and other relevant stakeholders) in the development, implementation and/or regulation of sustainability-related labelling as described in the discussion paper.</p> <p>The EUMS acknowledge the value of sustainability-related labelling that is clear, comparable, verifiable and reliable.</p> <p>The new work on sustainability labelling would be in line with Codex's mission to 'protect consumer health and promote fair practices in food trade by setting international science-based food safety and quality standards'. It would contribute to achieve the United Nations' Sustainable Development Goals (SDGs) (in particular SDG12 'ensuring sustainable consumption and production patterns'). It would fall within the terms of reference for CCFL (in particular to draft provisions on labelling applicable to all foods and to study problems associated with the advertisement of food with particular reference to claims).</p>	<p>European Union</p>

<p>FIA supports the intended proposal in Appendix 1. While the work is to be maintained as a high-level guidance, an overarching or comprehensive set of principles for sustainability-related labelling would be crucial and of priority to ensure the accuracy of information to drive progress towards a more sustainable economy.</p> <p>We would like to propose for further discussions and alignment from member countries on how CAC will include sustainability in its mandate before sustainability considerations be addressed in Codex Standards at CCFL. For instance, this can include a discussion on how sustainability-related standards development and adoption procedures will be kept consistent to science and risk-based standard setting. It is also important to understand how the Committee' work ladders up to the overarching mandate could facilitate more focused discussion and potentially faster text adoption, which align with Codex Strategic Goal 1.</p>	<p>Food Industry Asia</p>
<p>FoodDrinkEurope welcomes the proposal to initiate new work on sustainable claims under the remit of the CCFL. Setting up general principles for sustainability-related labels at Codex will assist governments in establishing national regulatory rules on this matter. It will support consumers in making informative choice and compare the sustainability of products as well as will prevent unfair practices in markets.</p> <p>This is an area which is still in its initial phase and continuously developing, with many important knowledge gaps and trade-offs to be considered between sometimes conflicting objectives. Against this background, we think the aim of Codex work at this stage should not be to reach consensus on an actual labelling model but rather focus on methods and data to measure sustainability impacts of food production, as a necessary basis before getting to the discussion on how to visualise this in a label.</p> <p>Therefore, FoodDrinkEurope believes that the scope of the work should be broadened to cover technical criteria for substantiation of sustainability-related labelling. If not included in this work, FoodDrinkEurope recommends defining, soon after, a workable environmental metric, LCA-based, to enable a harmonized and quantitative assessment, operable across borders. The metric should have a sufficient level of granularity to allow consumers driving improvements in production systems, favoring the resorting to primary data, and reporting the environmental impacts holistically, beyond carbon only.</p>	<p>FoodDrinkEurope</p>
<p>Debe iniciarse el trabajo, mientras no hay armonización puede generarse comercio desleal</p>	<p>Guatemala</p>
<p>The International Dairy Federation (IDF) notes with interest the proposal by the Codex Committee on Food Labelling to develop guidelines on sustainability labelling claims. Achieving healthy diets/dietary pattern produced sustainably relies on a balance between nutrition, environment, social, cultural, and economic aspects. In line with the FAO Guiding Principles on sustainable healthy diets, consideration must be given to how sustainability is defined and, as such, be aligned with the FAO Guiding principles giving regard to all four domains: environment, social, economic and cultural (1).</p> <p>Recognizing the broad scope of the term 'sustainability', IDF consider it necessary to define the term 'sustainability-related labelling'. This will support the progression of guidelines that are fit for purpose and ensures all members have the same understanding of 'sustainability'. IDF considers that should scope be limited, 'environmental' sustainability labelling is most appropriate for progression based on current consumer need for information.</p> <p>IDF agree that CCFL work should be limited to high-level guidance and principles for developing sustainability-related labelling on food.</p> <p>The IDF has developed guiding principles when consideration is given to sustainability claims with a scope limited to 'environmental'. These principles are intended to identify considerations and contextual elements relevant to environmental labelling of food (these principles may also have relevancy for environmental claims and exclude nutritional value on front-of-</p>	<p>IDF/FIL</p>

pack). An important overall consideration is that a low carbon product is not the same as a low carbon diet and is not the same as sustainable diet or dietary pattern.

In this document the following definitions are used:

The “environment” is the totality of all the external conditions affecting the life, development, and survival of an organism. – OECD

“Labelling” includes any written, printed, or graphic matter that is present on the label, accompanies the food, or is displayed near the food, including that for the purpose of promoting its sale or disposal. – CXS 1-1955

“Claim” means any representation which states, suggests or implies that a food has particular qualities relating to its origin, nutritional properties, nature, processing, composition or any other quality - CXS 1-1955]

A “nutritional LCA (nLCA)” study is defined as a Life Cycle Assessment (LCA) study where the provision of nutrient(s) is considered as either the main function or one of the main functions of a food item – FAO (2021) (2)

IDF Principles for Environmental Sustainability Claims

Environmental Sustainability claims on foods must:

- I. Be truthful, accurate, impartial, and not misleading.
 - o This can be accomplished by ensuring that supporting information is readily available and transparent, while respecting confidential business information and intellectual property rights.
- II. Be implemented on a voluntary basis and not create barriers to international trade.
- III. Provide meaningful information about the environmental impact of the product, considering both positive and negative externalities, that are specific/relevant to the product.
 - o Consider local or regional contexts with regards to the environmental impact
 - o Consider the nutritional value of the food (3) .
 - o Consider country or region-specific Dietary Guidelines and/or science-based nutrition policies to ensure environmental labels do not ignore the nutrition and health benefits of consuming certain foods and/or food groups.
- IV. Be based on the best available, evidence-based, internationally recognized methodology using fit for purpose and replicable data.
 - o The methodology should include life cycle assessment that consider all stages of producing/ manufacturing the product from cradle to shelf.
 - o Expressing the environmental impact (LCA) of a food on a mass or volume basis is not recommended because it is not coherent with the primary function of the food, which is to provide nutritional value (4) .
 - o Prioritize ongoing research to enable future use of nLCA methodology as appropriate.
 - o If comparisons are provided, they should be made in a consistent manner with comparable and transparent methodologies and best available data.
- V. Be supported by education programs, to enable consumers to choose healthy balanced sustainable diets/ dietary pattern and effectively interpret the environmental labels.
- VI. Be regularly reviewed and monitored to ensure methodologies and data stay current, reflect changing scientific evidence.

<p>VII. Allow for improvement, innovation, and progress overtime.</p> <p>VIII. Be aligned with the ONE HEALTH approach (5).</p> <p>Reference</p> <p>(1) FAO and WHO. 2019 Sustainable healthy diets – Guiding principles. Rome.</p> <p>(2) McLaren, S., Berardy, A., Henderson, A., Holden, N., Huppertz, T., Jolliet, O., De Camillis, C., Renouf, M., Rugani, B., Saarinen, M., van der Pols, J., Vázquez-Rowe, I., Antón Vallejo, A., Bianchi, M., Chaudhary, A., Chen, C., CooremanAlgoed, M., Dong, H., Grant, T., Green, A., Hallström, E., Hoang, H., Leip, A., Lynch, J., McAuliffe, G., Ridoutt, B., Saget, S., Scherer, L., Tuomisto, H., Tyedmers, P. & van Zanten, H. 2021. Integration of environment and nutrition in life cycle assessment of food items: opportunities and challenges. Rome, FAO. https://doi.org/10.4060/cb8054en</p> <p>(3) Relevant methodologies to be considered such as nLCA</p> <p>(4) with due regards to food based dietary guidelines and science-based nutrition policies</p> <p>(5) One Health is an integrated, unifying approach that aims to sustainably balance and optimize the health of people, animals and ecosystems.” (One Health High-Level Expert Panel (OHHLEP) (who.int))</p>	
<p>We understand that the CCFL focus on the labeling of food products, in a relation business to customers, aiming at improving the capacity of choice of the food consumer. We, therefore, will follow with attention the decision of the Committee, whether to continue the work or not.</p> <p>If the work would continue, as actor in the food chain, we will contribute, as far as necessary to the discussions.</p>	<p>International Feed Industry Federation</p>
<p>oui</p>	<p>Morocco</p>
<p>New Zealand supports CCFL initiating new work on sustainability-related labelling. CX/FL 23/47/12 clearly demonstrated that sustainability-related labelling is within the Terms of Reference of CCFL and that this labelling is prevalent on food. Whilst the General Guidelines on Claims (CXG 1-1979) provide information pertinent to sustainability related labelling, there is benefit in providing more specific information to promote harmonisation and the provision of meaningful information on sustainability to consumers.</p> <p>It is timely for CCFL to initiate work on sustainability related labelling before the proliferation of government regulations. This offers the best opportunity for CCFL to maximise the benefit of this new work.</p> <p>New Zealand considers there is value in providing additional guidance on aspects such as substantiation and ensuring meaningful claims for consumers that are not misleading. This type of information is provided for other specific claims such as nutrition and health claims. For example, CXG 23-1997, provides conditions for comparative claims, relevant context statements to help consumers interpret claims and specifies the use of validated methodology. There could be aspects related to the implementation and development of sustainability-related labelling that could be beneficial to provide additional guidance noting such information was provided in the Guidelines for Front-of-Pack Nutrition Labelling. The UN Guidelines for Providing Product Sustainability Information provide useful examples of the type of information that CCFL may wish to consider providing in relation to sustainability-related labelling for food. CCFL should also have regard to the World Business Council for Sustainable Development on Food Labelling: Principles to Support the Uptake of Healthy and Sustainable Diets.</p>	<p>New Zealand</p>
<p>We support the proposal for new work as this guidance might assist members in their implementation efforts with respect to the UN SDGs. More specific comments from our side might be provided at the upcoming session</p>	<p>Norway</p>

<p>Creemos conveniente que el Codex inicie este nuevo trabajo, teniendo en cuenta que, actualmente a nivel mundial la utilización de este tipo de etiquetas está en auge, y estas directrices ayudaría a la armonización de las legislaciones nacionales, asimismo el mismo serviría de base para dichas legislaciones, lo cuál aportaría al comercio internacional.</p>	<p>Paraguay</p>
<p>The Kingdom of Saudi Arabia supports establishing a new work on sustainability-related labelling, and we believe the presence of an international text regulating such claims is of high importance. In addition, in 2021 the Kingdom of Saudi Arabia issued a standard on “high nutritional value” food, in which it permits the declaration of a “high nutritional value” claim if the food product complies with the nutritional requirements stipulated in the standard. Consequently, we believe it is essential to have a unified legislation agreed upon at the international level that regulates the existence of such claims and provides an opportunity for food industries to compete in creating food products of high nutritional value.</p> <p>As stated in the objectives of the UN Sustainable Development Goals, the creation and application of sustainability labeling has the potential to contribute to the development of sustainable and healthy food systems for a sustainable future. In addition, the media and public attention on climate change and the rise in sustainability labelling of food products provide an opportunity to develop food system analytics and sustainability measures. Not to mention that food labeling has a significant impact and could raise general awareness to the consumers on the production and consumption of food.</p>	<p>Saudi Arabia</p>
<p>Comments on whether such work should be limited to high-level guidance and principles for developing sustainability-related labelling on food</p>	
<p>Australia notes the project document proposes to consider a definition of sustainability-related labelling. This will be an important aspect, noting this has the potential to cover a broad range of factors.</p> <p>Australia suggests it will be important for this work to consider available information from other international organizations. For example, the following resources may provide useful information to draw from:</p> <p>World Business Council for Sustainable Development (2021): Food Labelling: Principles to support the uptake of healthy and sustainable diets - World Business Council for Sustainable Development (WBCSD)</p> <p>United Nations (2017): The Guidelines for Providing Product Sustainability Information One Planet network</p> <p>OECD (2016): Environmental labelling and information schemes: Policy Perspectives</p>	<p>Australia</p>
<p>Se podría iniciar un nuevo trabajo limitándose a orientaciones y principios de alto nivel para elaborar un etiquetado de los alimentos relativo a la sostenibilidad que impacte o se relacione directamente con la inocuidad y calidad de alimentos.</p>	<p>Colombia</p>
<p>Costa Rica tiene algunas inquietudes respecto a la necesidad y el valor que podrían aportar las Directrices de alto nivel en etiquetado de sostenibilidad. Consideramos que estas directrices podrían no ser suficientes para prevenir la proliferación del etiquetado de sostenibilidad, especialmente considerando que muchos de estos etiquetados son iniciativas privadas y algunos incluso son verificados por terceros, tal como se evidenció en el inventario realizado.</p> <p>Por lo tanto, sería importante considerar cuidadosamente las posibles limitaciones y efectividad de estas directrices antes de implementarlas, y explorar también otros posibles enfoques para las directrices.</p>	<p>Costa Rica</p>
<p>El país considera que, los criterios impartidos en el documento de debate, destacando “El aumento de la conciencia mundial sobre la sostenibilidad, incluidos los impactos del cambio climático, el medio ambiente, el bienestar animal y los derechos laborales...”, están muy bien sustentados para ser considerados como orientaciones y principios de alto nivel para el etiquetado de los alimentos relativo a la sostenibilidad; además que, se estaría cumpliendo con los objetivos estratégicos del Codex y permitiría ayudar a los gobiernos o partes interesadas en el desarrollo, implementación o regulación del etiquetado</p>	<p>Ecuador</p>

relativo a la sostenibilidad; de tal manera que, se ve importante que esta nueva labor, se lleve a cabo por medio de un grupo de trabajo por medios electrónicos, facilitando la igualdad de oportunidades de participación para todos los miembros y expresar las realidades nacionales a través de la experiencia de los países que ya cuentan con un trabajo similar en el país.	
<p>Egypt believes that work should include details about sustainability-related labelling rather than being limited to high-level guidance and principles only. For example:</p> <p>1- Identify key stakeholders: It is important to identify the key stakeholders who will be involved in the project, such as food producers, retailers, and consumers. Stakeholder engagement is essential for the success of the project and should be considered at every stage of the project.</p> <p>2- Develop a sustainability framework: The project document should outline a sustainability framework that will be used to assess the environmental and social impact of food products. This framework should be based on established sustainability standards and guidelines and should be flexible enough to accommodate different types of food products.</p> <p>3- Establish labeling criteria: The project should establish clear labeling criteria that will be used to determine which food products will receive sustainability-related labeling. The labeling criteria should be based on the sustainability framework and should be transparent and easy for consumers to understand.</p> <p>4- Consider the costs and benefits: The project document should consider the costs and benefits of implementing sustainability-related labeling on food products. This includes the cost of developing and implementing the labeling system, as well as the potential benefits to consumers, food producers, and the environment.</p>	Egypt
The EUMS are of the opinion that such work should focus on the establishment of necessary definitions and general principles for sustainability-related labelling on food.	European Union
Should the new work be limited to the development of high-level guidance, an amendment to the Codex General Guidelines on Claims CXG 1-1979 (more specifically Chapter 5 Conditional Claims therein) seems the most appropriate approach.	FoodDrinkEurope
no debería limitarse simplemente a orientaciones y principios ya que de esta forma es difícil lograr una armonización.	Guatemala
See above comments.	ICGMA
IFU considers that such work should be limited to high level guidance. Particularly where countries or regions have a wide range of infrastructure for recycling. The guidance should be flexible taking into account limiting factors	IFU
<p>If further work is to be organized for developing sustainability-related labeling, we believe that the first step should , indeed, consist in a high level guidance document, considering all aspects of sustainability (social, economic, and environmental). This will allow achieving one of the goals of the discussion paper, i.e. limit the creation of additional labeling schemes.</p> <p>If necessary, further technical details may be developed in the future, building on (not yet realized) consensus on methodologies and factors weighing</p>	International Feed Industry Federation
We think that it is necessary to clarify what the term “high-level guidance” means.	Japan
oui	Morocco

New Zealand considers it is critical that any new work on sustainability-related labelling remain high level. We consider principles specific to sustainability-related labelling would add value to the current General Guidelines on Claims (CXG 1-1979) (rationale provided in response to question a). CCFL does not have the relevant expertise to provide detailed guidance on or criteria for sustainability-related labelling.	New Zealand
Es nuestro parecer que la utilización de orientaciones y principios de alto nivel en el marco de la elaboración de estas directrices, ayudaría a la armonización de estas etiquetas.	Paraguay
The Kingdom of Saudi Arabia supports that the work for developing sustainability-related labelling on food be of a high-level guidance and principles.	Saudi Arabia
South Africa supports the proposal to develop high level guidance and principles for sustainable- related labelling on foods. Rationale: This will assist the relevant governments in establishing national regulatory provisions which could contribute in increasing harmonization and fair trade practices.	South Africa
Any other comments to improve the associated project document	
En el punto 6 del Apéndice 1 se indica que es necesaria una orientación específica relativa a la sostenibilidad, ya que el tema no fue considerado en el momento en que se establecieron las directrices generales sobre declaraciones de propiedades. En este sentido, sería relevante conocer cuáles son aquellos aspectos identificados, relacionados con la sostenibilidad, que no son cubiertos por las directrices mencionadas, así como, incluir una reseña de aquellas declaraciones de sostenibilidad que impacten la inocuidad y calidad de alimentos.	Colombia
Costa Rica desea aportar algunos comentarios relativos al documento de proyecto, los cuales se señalan adelante.	Costa Rica
Ecuador considera que el trabajo expuesto en el Apéndice 1 está muy bien sustentado y justificado; por lo que, el país continuará alentando el trabajo propuesto y emitiendo los criterios correspondientes considerando nuestra realidad nacional.	Ecuador
Egypt suggests the following: 1- Develop a communication plan: The project team should develop a communication plan that will help to promote the benefits of sustainability-related labelling to key stakeholders, such as food producers, retailers, and consumers. The communication plan should also include strategies for addressing any potential concerns or challenges related to the labelling system. 2- Monitor and evaluate the project: The project document should include a plan for monitoring and evaluating the effectiveness of the sustainability-related labelling system. This will help the project team to identify any areas that need improvement and make adjustments as needed.	Egypt
FIA would like to highlight the work done by the World Business Council for Sustainable Development (WBCSD) on Food Labelling: Principles to support the uptake of healthy and sustainable diets (https://www.wbcsd.org/Programs/Food-and-Nature/Food-Land-Use/FReSH/Resources/Food-Labeling-Principles-to-support-the-uptake-of-healthy-and-sustainable-diets) that highlights the fundamental principles for food scoring labels to which sustainability-related labelling is part of in order to help consumers make informed decisions, and the UN's Guidelines for Providing Product Sustainability Labelling Information (https://www.oneplanetnetwork.org/knowledge-centre/resources/guidelines-providing-product-sustainability-information) that is developed in response to SGD12.	Food Industry Asia

<p>Considering the recent Green Claims Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A0166%3AFIN) that applies to both claims and labels, its adoption is expected to have a significant impact on businesses making green claims. While this may fall only within the context of the products sold in the EU, it could potentially affect how companies beyond the EU in terms of the use green claims in the near future. With this in mind, FIA would also like to seek clarification from the Chairs if there are other internationally recognised bodies with scientific expertise in this area.</p>	
<p>The project document could further clarify which types of claims (as identified in the stocktake exercise) the Codex Guidelines would cover, and -per type of claim- which type(s) of substantiation would be appropriate to support such claim.</p>	FoodDrinkEurope
<p>The International Council of Beverages Associations (ICBA) appreciates the interest of Codex in exploring how sustainability can be addressed in its workstreams, such as this proposed work on sustainability labelling claims.</p> <p>However, we believe that before sustainability considerations are addressed in Codex standards at CCFL and other technical committees, there must be fundamental discussion and agreement from Members on whether and how the Codex Alimentarius Commission will include sustainability in its mandate. This should include discussion of how sustainability-related standards development and adoption procedures will be kept consistent with the Codex commitment to science and risk-based standard setting.</p> <p>It is important for Committees to understand how their work relates to the overarching Codex mandate, because this should facilitate more focused discussions and potentially faster text adoption, which would align with Codex Strategic Goal 1.</p>	ICBA
<p>See above comments.</p>	ICGMA
<p>No other comments</p>	IFU
<p>We appreciate the reference to robust science on the page 4 of the document: ‘.....prompting the need for best-practice guidance based on robust science’ and believe this should be reiterated in the proposal for new work on sustainability related labelling, under page 5, §1, second paragraph and second bullet point as follows:</p> <ul style="list-style-type: none"> • Substantiated by robust science and widely recognized methods. <p>Example of robust science and widely recognized methods would be the use of Life Cycle Assessment for the evaluation of the environmental impact along the food chain.</p>	International Feed Industry Federation
<p>New Zealand supports the project document and considers an electronic working group is needed to progress this work.</p>	New Zealand
<p>Creemos que es importante contar con estudios científicos con relación a la comprensión del consumidor sobre el etiquetado en alimentos relativo a la sostenibilidad.</p>	Paraguay
<p>The Kingdom of Saudi Arabia would like to highlight, to the chair of the committee and fellow members, that a challenge might be faced in determining a product's sustainability (from different food categories) at the point of purchase. Thus, it is crucial to maintain the trust and transparency of various sustainability indices or measures across varying product categories and set a clear definition for sustainability-related labelling on food to ensure accountability for food fraud or the use of deceptive marketing strategies.</p>	Saudi Arabia
<p>South Africa is in support of the information provided in the project document with no further comments.</p>	South Africa

SPECIFIC COMMENTS ON THE PROJECT DOCUMENT	
1. PURPOSE AND SCOPE OF THE NEW WORK	
<p>Para 2, last bullet</p> <p><i>cuando sea posible, comparable o armonizado.</i></p> <p>Consideramos que se debe mejorar la redacción ya que el ámbito de aplicación que se define en los 2 primeros párrafos, queda como fuera de este contexto. Y a que se refiere ¿Justificado y significativo?</p>	Honduras
<p>Para 3</p> <p><i>Esto ayudaría a los consumidores a tomar decisiones informadas sobre la sostenibilidad de los productos y ayudaría a reducir las barreras al comercio.</i></p> <p>El etiquetado de sostenibilidad ambiental de los alimentos debería incluir todo el ciclo de vida del producto y no solo unas pocas etapas de éste, pues eso provoca información sesgada, no comparable y finalmente no confiable, lo que puede afectar la credibilidad del etiquetado para sostenibilidad ambiental e incluso provocar confusión entre los consumidores, en especial si se quieren hacer comparaciones válidas entre productos.</p> <p>En el caso del etiquetado ambiental, la única forma creíble de hacer comparaciones válidas y científicamente respaldadas entre productos es considerar la huella ambiental. Cualquier otra comparación ambiental carece de la fundamentación científica necesaria para eliminar la subjetividad en las comparaciones.</p>	Costa Rica
2. RELEVANCE AND TIMELINESS	
<p>Para 2</p> <p><i>El inventario realizado ilustra el gran número y la diversidad del etiquetado relativo a la sostenibilidad que se utiliza actualmente en los productos alimenticios. Estos etiquetados se basan en diversos atributos y criterios. Es importante que estos etiquetados cumplan con los requisitos de las Directrices generales sobre declaraciones de propiedades para garantizar que no se presenten de manera falsa, engañosa o falaz, y que estén justificados y sean significativos para que los consumidores puedan tomar decisiones informadas. Se necesita una orientación más específica para el etiquetado relativo a la sostenibilidad a fin de ayudar a los gobiernos y otras partes interesadas pertinentes que deseen desarrollar, implementar o regular dicho etiquetado.</i></p> <p>Costa Rica ha analizado el contenido del inventario de etiquetado realizado y desea aportar algunos comentarios desde el punto de vista ambiental:</p> <p>1- Algunas etiquetas son mono temáticas (abejas, aves, etc), por lo que no abarcan toda la temática ambiental. Se debe promover el uso de etiquetas ambientales que abarquen la temática ambiental de forma integral.</p> <p>2- La utilización de etiquetas monotemáticas en el campo ambiental puede provocar la proliferación de etiquetas sobre una misma área (ambiente), lo que finalmente puede causar confusión en el consumidor. Se deben usar etiquetas de amplio alcance y que no contribuyan con la confusión de los consumidores.</p> <p>3- Algunas etiquetas ambientales mencionadas sí se basan en el análisis de ciclo de vida, pero son la minoría de las incluidas en el listado. Si se quiere tomar en cuenta de forma integral el tema ambiental, el etiquetado debe estar basado en el análisis de la totalidad de las etapas del ciclo de vida.</p> <p>4- Muchas de las certificaciones ambientales mencionadas, son referidas a sistemas (procesos, empresa, etc.) por lo que NO pueden aplicarse directamente a productos, porque de hacerse así se incumplen normas internacionales de uso de marcas,</p>	Costa Rica

<p>como la ISO 17030, por lo que no sería una buena práctica. Las certificaciones a incluir deberían estar referidas al producto y no a sistemas.</p> <p>5- Algunas etiquetas son gestionadas por el propio sector productivo interesado, lo que podría presentar un potencial conflicto de interés. En ese sentido es importante tomar medidas para garantizar la transparencia al establecer estándares claros para la información que se proporciona en las etiquetas de los alimentos y con ello aumentar la confianza de los consumidores.</p> <p>6- La gran mayoría de las etiquetas enlistadas son ambientales. No hay muchos ejemplos de etiquetas sociales o económicas por separado. Analizar si el tema ambiental, social y económico se va a informar por separado o se desea hacer una integración.</p> <p>7- En los ejemplos presentados no existe ningún ejemplo de una etiqueta que incluya los tres pilares en una sola etiqueta (ambiental, social, económico), por lo que inicialmente es posible pensar que se van a tener que implementar etiquetas separadas por cada uno de los tres pilares.</p>	
3. MAIN ASPECTS TO BE COVERED	
<p>Para 1, 3 bullet</p> <p><i>Definición de etiquetado relativo a la sostenibilidad (si es necesario y apropiado)</i></p> <p>Si se considera que es necesario y apropiado contar con esta definición</p>	Honduras
4. ASSESSMENT AGAINST THE CRITERIA FOR ESTABLISHMENT OF NEW WORK PRIORITIES	
<p><i>a) El inventario demuestra la proliferación de diversos etiquetados relativos a la sostenibilidad a nivel internacional. Actualmente, existe una regulación gubernamental relativamente limitada para el etiquetado relativo a la sostenibilidad y, cuando está presente, se centra en áreas específicas, como las declaraciones de propiedades orgánicas o vegetarianas. Es probable, sin embargo, que la regulación gubernamental para el etiquetado relativo a la sostenibilidad aumente dado el enfoque en la sostenibilidad por parte de los consumidores y las Naciones Unidas. Por lo tanto, son oportunos los principios de alto nivel para proporcionar orientación para ayudar a los gobiernos (u otras partes interesadas) en el desarrollo, implementación o regulación del etiquetado relativo a la sostenibilidad. Proporcionar dicha orientación antes de que la legislación se desarrolle ampliamente a nivel nacional promoverá la armonización y facilitará el comercio.</i></p> <p>Sugerimos mejorar la redacción y la traducción ya que se vuelve confuso.</p>	Honduras
<p>b) <i>Ámbito de aplicación del trabajo y establecimiento de prioridades entre las distintas secciones de la obra</i></p> <p>Sugerimos mejorar la traducción ya que se menciona "secciones del trabajo o del documento"</p>	Honduras
<p><i>b) Se propone que se elaboren orientaciones para el etiquetado relativo a la sostenibilidad a fin de ayudar a los gobiernos (y otras partes interesadas) en el desarrollo, la aplicación y/o la reglamentación del etiquetado relativo a la sostenibilidad.</i></p> <p>Costa Rica considera que debe tomarse como base todo el trabajo existente en la materia y que tiene una adecuada fundamentación técnica. Es conveniente armonizar los esquemas de etiquetado ambiental serios que incluyen a los alimentos para disminuir la posibilidad de confusión de los consumidores.</p>	Costa Rica
<p>c) <i>Trabajos ya iniciados por otros organismos internacionales en este campo y/o propuestos por el organismo o los organismos internacionales pertinentes de carácter intergubernamental</i></p>	Costa Rica

<p>Costa Rica desea señalar la pertinencia de algunos trabajos existentes o en curso iniciados tanto por la Organización Mundial del Comercio (OMC) como la Organización Internacional de Normalización (ISO):</p> <p>Es importante tener en cuenta el trabajo que se está llevando a cabo en el marco del Comité de Comercio y Medio Ambiente de la OMC. El Acuerdo en cambio climático, comercio y sostenibilidad – “Agreement on Climate Change, Trade and Sustainability (ACCTS)” es liderado por Costa Rica, Fiyi, Islandia, Nueva Zelanda y Noruega.</p> <p>El ACCTS cuenta con un grupo de trabajo que está elaborando las “Directrices para orientar la elaboración y aplicación de programas y mecanismos voluntarios de etiquetado ecológico” que tiene como objetivo acordar un conjunto de directrices para guiar el desarrollo e implementación de estándares voluntarios sobre el etiquetado ambiental de productos y servicios, así como establecer los mecanismos institucionales para la promoción de las directrices. Aún se está discutiendo si se incluyen todos los productos o se limita a un grupo de productos, o si se incluye servicios y si se incluyen todos los tipos de eco-etiquetado.</p> <p>Por otra parte, la ISO tiene un papel importante en el desarrollo de normas técnicas y de gestión que abordan cuestiones ambientales y sociales relativas a sostenibilidad. Existe la serie de normas ISO 14020 relativas a eco-etiquetado entre las cuales se pueden mencionar:</p> <p>ISO 14020:2000 Etiquetas y declaraciones ambientales — Principios generales: Esta Norma Internacional establece las directrices para el desarrollo y uso de las etiquetas y declaraciones ambientales.</p> <p>ISO 14024:2018 Etiquetas y declaraciones ambientales — Etiquetado ambiental Tipo I — Principios y procedimientos: Este documento establece los principios y procedimientos para desarrollar los programas de etiquetado ambiental Tipo I, incluyendo la selección de las categorías de producto, los criterios ambientales de producto y las características funcionales de producto, para evaluar y demostrar su cumplimiento. Este documento establece también, los procedimientos de certificación para el otorgamiento de la etiqueta.</p> <p>ISO 14021:2016 Etiquetas y declaraciones ambientales — Afirmaciones ambientales autodeclaradas (Etiquetado ambiental tipo II): Esta Norma Internacional especifica los requisitos para las afirmaciones ambientales autodeclaradas, incluyendo enunciados, símbolos y gráficos relativos a los productos.</p> <p>ISO 14025:2006 Etiquetas y declaraciones ambientales — Declaraciones ambientales tipo III — Principios y procedimientos: Esta Norma Internacional establece los principios y especifica los procedimientos para desarrollar programas de declaraciones ambientales tipo III y declaraciones ambientales tipo III. Establece específicamente la utilización de la serie de Normas ISO 14040 en el desarrollo de programas de declaraciones ambientales tipo III y de declaraciones ambientales tipo III.</p> <p>En ese sentido, el CCFL debería discutir si estas normas podrían cubrir las preocupaciones de etiquetado de alimentos sostenibles potencialmente engañosos.</p>	
<p>d) Muchos países recurren al Codex para obtener orientaciones de etiquetado claras y no ambiguas. El propósito del trabajo propuesto es desarrollar dicha orientación para ayudar a los gobiernos (u otras partes interesadas) en el desarrollo, implementación y/o regulación del etiquetado relativo relacionado a la sostenibilidad. Si bien las <i>Directrices generales sobre declaraciones de propiedades</i> exigen que la información proporcionada voluntariamente en las etiquetas (declaraciones de propiedades) no se presente de manera falsa, engañosa o falaz, y que esté fundamentada y sea significativa, se necesita una orientación más específica para el etiquetado relativo a la sostenibilidad a fin de ayudar a los gobiernos y otras partes interesadas que buscan desarrollar, implementar y/o regular dicho etiquetado para garantizar que se cumplan estos</p>	<p>Honduras</p>

<p>requisitos. Desde la elaboración de las <i>Directrices generales sobre declaraciones de propiedades</i>, en 1979, se han elaborado varios textos del Codex para proporcionar orientación adicional sobre tipos específicos de declaraciones de propiedades, cuando esto ha sido considerado necesario, tales como las <i>Directrices para el uso de declaraciones de propiedades nutricionales y saludables</i> (CXG 23-1997) y las <i>Directrices generales para el uso del término "halal"</i> (CXG 24-1997).</p>	
5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES	
<p><i>Strategic Goal 2 Una orientación de alto nivel sobre el etiquetado relativo a la sostenibilidad ayudaría a garantizar una comprensión más clara de cómo cumplir los requisitos de justificación de las Directrices generales sobre declaraciones de propiedades para dicho etiquetado, y, por lo tanto, garantizar que el etiquetado relativo a la sostenibilidad se base en la ciencia.</i></p> <p>Si se quiere promover la calidad ambiental de los productos alimenticios basada en datos científicos, necesariamente se debe partir del análisis de ciclo de vida. Por lo tanto, se deben incorporar todas las etapas del ciclo de vida de un producto alimenticio y no solo algunas a conveniencia de los interesados. De no hacerlo así, se estaría eliminando la posibilidad de hacer comparaciones válidas y se estaría creando confusión entre los consumidores.</p>	Costa Rica
6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENT	
<p>Para 1</p> <p>Sugerimos ampliar previamente a que se refiere justificadas y significativas</p>	Honduras
7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE	
<p>Costa Rica señala que, al ser un tema incipiente en el Codex, aunque se trate de orientaciones muy generales, el etiquetado ambiental es un tema muy interdisciplinario, por lo tanto se va a necesitar la participación de un grupo científico en diversos campos incluyendo especialistas en etiquetado ambiental de productos, para que lo que se haga esté en consonancia con las mejores prácticas internacionales en este tema. Por tanto, en caso de llevarse a cabo este trabajo propone que se tome en cuenta a la FAO y otros organismos con experiencia en temas de sostenibilidad.</p>	Costa Rica