

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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**AGENDA ITEM NO.7**

**CX/FL 04/7**

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON FOOD LABELLING  
THIRTY-SECOND SESSION  
MONTREAL, CANADA, MAY 10 – 14, 2004**

**PROPOSED DRAFT AMENDMENT TO *THE GENERAL STANDARD FOR THE  
LABELLING OF PREPACKAGED FOODS:*  
QUANTITATIVE DECLARATION OF INGREDIENTS  
(CL 2003/18-FL)**

**GOVERNMENT COMMENTS AT STEP 3**

**COMMENTS FROM:**

**BRAZIL  
GUATEMALA  
EUROPEAN COMMUNITY  
WORLD SUGAR RESEARCH ORGANISATION (WSRO)**

**PROPOSED DRAFT AMENDMENT TO THE *GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS*:  
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**GOVERNMENT COMMENTS AT STEP 3**

**BRAZIL:**

Brazil has the pleasure to forward the following comments:

**Item 5.1.1.**

**(a), (e), and (j):** To keep the items.

**(b), (c), (d) and (g):** To include examples, in order to clarified the situations where they will be used.

**(f)** – To remove the square brackets and to keep the item.

**(h)** -To substitute the sentence between square brackets: “[the ingredient comprises less than 2% of the total weight of the product and has been used for the purposes of flavouring; or]” by **“When the ingredient is used as flavoring and without purpose to add nutricional or health values”**

**(i)**- Brazil requests explanations on the criteria adopted to establish the percentual of 2%, and suggests to keep between square brackets the expression: “reasonable expectation”, since it is confused and not measurable.

**5.1.2.** To remove the square brackets from the 1º and 2º paragraphs, keeping them in the text.

**(a) and (b)** - Brazil requests explanations on itens (a) and (b), taking into consideration the difficulty on quantifying the expressions: “on the small amount” and “on the large amount”.

**(c):** - To keep the item.

**GUATEMALA:**

- Regarding Section 5.1, Guatemala considers that the quantitative declaration, as a percentage of any given ingredient that is emphasized or mentioned on the label or in the brand name, would force food producers to reveal confidential information, which is not feasible, given property rights over the formulas. It is important to indicate that

in some cases it could be necessary to quantitatively declare more than one ingredient, which should make the information more revealing.

- The users have all the right to be informed about the product they are consuming. We believe that, to avoid misleading the consumer and to assist him/her to make the best purchasing decision, is enough to have the qualitative declaration of ingredients in the label, in decreasing order of concentration in the product, such as required by the present standard. To ensure compliance we believe that the regulatory authority should verify that the qualitative declaration of ingredients corresponds to the real contents of such product.
- If no quantitative declaration of ingredients is made, Section 5.1 should be totally eliminated, as it contains the specifications which would be used as the basis to report the percentage of ingredients.

## EUROPEAN COMMUNITY:

The E.C. welcomes the draft amendment, and fully agrees with its approach, since it requires a quantitative ingredient declaration in the cases where the choice of the consumer may be influenced by the quantity of one or several ingredients that are present in the food.

However, the E.C. considers that QUID should only relate to the ingredients utilised in the manufacture of foodstuffs and not to their eventual effect on health. There are other means of conveying information regarding possible effects of certain ingredients on health, such as nutrition labelling and nutrition or health claims.

Moreover, the reasons, listed in 5.1.1. (a) to (e), for triggering a quantitative ingredient declaration, seem likely to prevent all possible consumer deceptions.

Therefore, the EC is neither in favour of requiring quantitative ingredient declaration for the reasons outlined in 5.1.1.(f), nor, to be consistent, of making a case for exemption in relation with nutritional or health effects, such as in 5.1.1. (i). That is why the EC requests the deletion of points 5.1.1. (f) and (i).

## WORLD SUGAR RESEARCH ORGANISATION (WSRO):

The 31<sup>st</sup> Session of the Codex Committee on Food Labelling (CCFL) returned the Proposed Draft Amendment to Step 3 since no consensus could be reached on the text and several amendments had been proposed during the session.

WSRO would like to provide the following comments on section 5.1.1 (g) of the Proposed Draft Amendment:

**WSRO does not support the inclusion of “added sugars” in section 5.1.1 (g) in the Proposed Draft Amendment to the General Standard for Labelling of Prepackaged Foods.** Claims made on sugars are usually nutrition or health claims, which are already regulated in the frame of the

existing Guidelines on Nutrition Labelling (section 3.2.1.3). Therefore, sugars already have to be listed and quantified if they are subject of such a claim.

Thus, the listing of “added sugars” in section 5.1.1 (g) is redundant. We recommend that “added sugars” be deleted from section 5.1.1 (g).