

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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AGENDA ITEM NO. 6

CX/FL 06/34/8-ADD.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-FOURTH SESSION
OTTAWA, CANADA, MAY 1 – 5, 2006**

**PROPOSED DRAFT AMENDMENT TO *THE GENERAL STANDARD FOR THE
LABELLING OF PREPACKAGED FOODS:*
QUANTITATIVE DECLARATION OF INGREDIENTS
(ALIMORM 05/28/22 – APPENDIX II, AND CL 2005/48-FL)**

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

**EUROPEAN COMMUNITY
JORDAN
PERU
SOUTH AFRICA**

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GOVERNMENT COMMENTS AT STEP 3

EUROPEAN COMMUNITY:

The European Community (EC) is pleased with the progress allowed by the last work within the CCFL on the draft amendment, and recalls that it fully agrees with the approach of that draft, 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.

In that respect, the EC considers that the quantity of any ingredient emphasized in the name of the food should be declared, and therefore proposes the deletion of the square brackets around subsection c) of paragraph 5.1.1.

The EC considers that with a view to preventing all possible consumer deceptions, the circumstances listed in 5.1.1. (a) to (c) for triggering a quantitative ingredient declaration, seem complete. Nutritional and health related information are dealt with by other standards and guidelines, which require a more specified and complete declaration of some ingredients or nutrient.

Therefore, the EC is not in favour of retaining 5.1.1 (d) and (e).

Finally, regarding 5.1.1. (f), the EC does not consider necessary to specify a limit under which the QUID would not be required, where an ingredient has been used for the purposes of flavouring. It would rather allow for certain flexibility, as the necessary dose for flavouring may be variable.

The EC would therefore signal its preference for the following wording:
“(f) The ingredient is used in small quantities for the purposes of flavouring.”

JORDAN:

We support amendment of the Codex Alimentarius requirements for Quantitative Declaration of Ingredients Labelling, as provided in Section 5.1 of the current draft text

Requested Changes:

- Accept 5 % (subsection 5.1.1.f) as the lower limit.

PERU:

We request the Committee to take into account the following comments and observations:

1. Point 5.1.1, indent c). We believe this indent reiterates the statement of indent a) and we recommend eliminating it.
2. Point 5.1.1, indent d). This is already addressed under the Codex Guidelines for the Use of Nutrition and Health Claims (CAC/GL23-1997, Rev. 1-2004), so we recommend eliminating it.
3. Point 5.1.1, indent f). We suggest considering eliminating the quantitative declaration of the ingredient when the ingredient comprises “less than 5% of the total weight of the product and has been used for the purposes of flavouring”.

SOUTH AFRICA:

Comments on point 5.1.1(d and e)

South Africa proposes to delete points 5.1.1(d and e). QUID, in our opinion, is about protecting the consumer from misleading information about expectations of the amount of an emphasized ingredient on the label or through advertising. It is purely a requirement regulators can put in place to prevent deception through practices that could potentially create consumer expectations, which are not met by the composition of the end product.

The emphasis of the QUID requirement is therefore **honesty** about the composition of a product. Whether or not it has relevance to health is not the point here. There are other means of conveying information regarding possible effects of certain ingredients on health, such as nutrition labelling and health claims. Conditions for health and nutrition claims and the nutrition declaration of a food product are already covered by other Codex Standards.

Comments on point 5.1.1(f)

South Africa will support 2%, especially if the emphasised ingredient is used for flavouring only.

Comments on point 5.1.1(g)

South Africa propose to add the words “or national legislation, whatever is applicable” after the word “Alimentarius to read as follows:

- (g) commodity-specific standards of Codex Alimentarius **or national legislation, whatever is applicable** conflict with the requirements described here.

Comments on point 5.1.2, 3rd paragraph

We prefer to have a choice in how the quantity is expressed according to our national legislation in other words either as a percentage or as the weight of the ingredients(s) used to prepare 100 g of the finished product.

It is our opinion that the concept of concentration is well understood by consumers, for example there may be for argument’s sake 120% tomatoes in a tomato sauce, as a result of a concentrated ingredient (in this case tomatoes).