codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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AGENDA ITEM NO. 6 **CX/FL 07/35/9-ADD.1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
THIRTY-FIFTH SESSION
OTTAWA, CANADA, APRIL 30 - MAY 4, 2007

PROPOSED DRAFT AMENDMENT TO *THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS:* QUANTITATIVE DECLARATION OF INGREDIENTS (ALIMORM 06/29/22 – APPENDIX VI)

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

JAPAN
KENYA
THAILAND

PROPOSED DRAFT AMENDMENT TO THE *GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS:*
QUANTITATIVE DECLARATION OF INGREDIENTS
(ALINORM 06/29/22 – APPENDIX VI)

GOVERNMENT COMMENTS AT STEP 3

JAPAN:

Japan appreciates the opportunity to make comments on Quantitative Declaration of Ingredients.

(General comments)
Japan recognizes the importance of quantitative declaration of ingredients for providing consumers with information for informed choices; and for protecting consumers from deception. In order to reach a consensus on this important issue, Japan comments only on the texts remaining in brackets. Japan recommends that member countries also focus their discussion on the texts remaining in square brackets, which was proposed by the Chairperson at the 34th Session of the CCFL. (ALINORM 06/29/22, para. 102)

(Specific comments on (c) and (d))
Japan supports to remove the square brackets and retain the proposed texts.

(Rationale)
Japan believes that the decision on whether an ingredient is emphasized on the label or not should be left to each member country, taking into account consumers' concerns, manufacturing practices and food culture.

(Specific comments on (e))
Japan proposes to delete the text in square brackets.

(Rationale)
Japan notes that member countries are asked for comments on this issue in response to CL 2006/44-CAC, Matters Referred by FAO and WHO: Implementation of the Global Strategy on Diet, Physical Activity and Health, as well. Japan generally supports the implementation of the Global Strategy. However, Japan believes that incorporating e) does not necessarily increase consumption of fruits, vegetables and whole grains. Japan also notes that if fruits, vegetables, whole grains or added sugars are characterizing ingredients, the percentage of the ingredients shall be declared in accordance with section 5.1.1 a), which remains without square brackets.

KENYA:

5.1.1. Kenya supports the inclusion of (c) because serves as a communication tool that will help the consumer identify the key ingredients of the food and give guidance to presentation of the product.

Kenya supports the inclusion of (d) because it helps consumer identify foods that have key ingredients that address issues of consumer health concerns.

5.1.2 Kenya supports the inclusion because it supports clear pictorial representation of the fruit content of the food which are associated general good health. It is also inline with labeling for declaring ingredients in descending order.

THAILAND:

5.1.1 Thailand is of the opinion that "(including ingredients of compound ingredients or category of ingredients[1])" appeared at the end of the sentence is still not acceptable.

We consider that an ingredient (with its name) that might be used in very little amount to produce foods can be a mixture of many kinds of ingredients (with their individual names), especially those to make Asian or other delicate foods. Once the compounds need to be quantitatively declared on a label, it is really difficult and problematic to the producers like ones in Thailand regarding the analysis methods used, equipment and increased capital cost. Furthermore, with regard to its explanatory note, we wonder what reference should be suitably referred to as the common name of a food.

As it is impossible to make quantitative declaration for all compounds of the ingredients, we suggest deleting as follows:

"(including ~~ingredients of compound ingredients or~~ category of ingredients[1])

(c) and **(d)**

The matters referred to a decision made or managed by a national authority should not be mentioned in this guideline.

(f)

With respect to "in small quantities", it still leaves unclear meaning especially for different interpreters. However, the amount of quantity to be set when necessary should be scientifically understandable that will not cause any doubt.