

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
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Organization

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PROPOSAL FOR NEW WORK ON THE APPLICATION OF FOOD LABELLING PROVISIONS TO ALCOHOLIC BEVERAGES

Comments by Brazil, Burundi, Cabo Verde, El Salvador, European Union, India, Japan, Nigeria, Republic of Korea, Senegal, United Republic of Tanzania, Zambia, Fédération internationale des vins et des spiritueux (FIVS), International Organisation of Vine and Wine (OIV) and NCD Alliance

Brazil

English

Brazil thanks Tanzania, Barbados, Botswana, Eswatini, Ghana, Jamaica, Madagascar, Saint Lucia, Seychelles, Uganda and WHO for preparing the discussion paper and project document on the application of food labelling provisions to alcoholic beverages.

Brazil supports initiating new work on this topic. Brazil recognizes that alcoholic beverages fall within the Codex definition of food and that existing Codex labelling texts provide an important foundation for these products. At the same time, further clarification may assist Members in applying these provisions consistently to the specific characteristics of alcoholic beverages.

In Brazil's view, this work is aligned with the two core Codex's objectives: protecting consumer health and ensuring fair practices in the food trade. It can contribute to the provision of clear, accurate and non-misleading information to consumers, while supporting regulatory convergence and fair practices in international trade.

Brazil notes that alcoholic beverages have specific characteristics relevant to labelling and consumer information, including the presence of ethanol. The inclusion of alcoholic beverages within the Codex definition of food should not be understood as implying nutritional value or any health benefit. Therefore, Codex work in this area should consider alcohol-related risks, including risks associated with the harmful use of alcohol, and should be consistent with scientific evidence, Codex principles and relevant international guidance and commitments, as appropriate.

Brazil considers that the work should be conducted through a stepwise, inclusive and consensus-oriented approach, with a clearly defined scope. Future discussions should take into account feasibility, proportionality, implementation implications, the diversity of alcoholic beverage categories and the different national regulatory contexts of Members.

Brazil supports focusing this work, as appropriate, on the revision or amendment of relevant existing Codex texts, including CXS 1-1985, CXG 2-1985 and CXG 23-1997. Particular attention could be given to:

- clarifying the application of CXS 1-1985 to alcoholic beverages, to provide greater legal certainty and support more consistent implementation across Members;
- considering provisions on alcohol strength declaration and, where appropriate, information that may help consumers understand the amount of alcohol in the product, subject to further technical discussion;
- considering how Codex texts could address health-related information, including warnings where appropriate, while allowing Members to discuss the scope, format, feasibility and implementation of any future provisions;
- considering how nutrition-related information for alcoholic beverages should be addressed, ensuring that any such information is presented in a neutral manner and does not imply healthfulness or encourage consumption;

- developing alcohol-specific provisions to prevent nutrition and health claims from misleading consumers or implying that alcoholic beverages are beneficial or healthier choices.

Brazil considers that issues related to the use of technology to provide food information should be addressed, if needed, in a manner consistent with recently adopted Codex guidance, avoiding duplication or reopening matters already agreed by CCFL.

Brazil also considers that this work should consider relevant work undertaken by other international organizations, avoiding duplication and ensuring consistency where appropriate.

Finally, Brazil supports the establishment of an electronic working group chaired by Tanzania, with the participation of interested Members and Observers, to further develop the proposed work for consideration by CCFL.

Espanol

Brasil agradece a Tanzania, Barbados, Botswana, Esuatini, Ghana, Jamaica, Madagascar, Santa Lucía, Seychelles, Uganda y la OMS por la preparación del documento de debate y del documento de proyecto sobre la aplicación de las disposiciones de etiquetado de alimentos a las bebidas alcohólicas.

Brasil apoya el inicio de nuevos trabajos sobre este tema. Brasil reconoce que las bebidas alcohólicas están comprendidas dentro de la definición de alimento del Codex y que los textos vigentes del Codex sobre etiquetado constituyen una base importante para estos productos. Al mismo tiempo, una mayor clarificación puede ayudar a los Miembros a aplicar estas disposiciones de manera coherente a las características específicas de las bebidas alcohólicas.

A juicio de Brasil, este trabajo está alineado con los dos objetivos fundamentales del Codex: proteger la salud de los consumidores y asegurar prácticas equitativas en el comercio de alimentos. Puede contribuir a proporcionar a los consumidores información clara, precisa y no engañosa, al tiempo que favorece la convergencia regulatoria y las prácticas justas en el comercio internacional.

Brasil observa que las bebidas alcohólicas presentan características específicas relevantes para el etiquetado y la información al consumidor, incluida la presencia de etanol. La inclusión de las bebidas alcohólicas dentro de la definición de alimento del Codex no debe interpretarse como una implicación de valor nutricional o de cualquier beneficio para la salud. Por lo tanto, el trabajo del Codex en esta área debe considerar los riesgos relacionados con el alcohol, incluidos los riesgos asociados al consumo nocivo de alcohol, y debe ser coherente con la evidencia científica, los principios del Codex y las orientaciones y compromisos internacionales pertinentes, según corresponda.

Brasil considera que este trabajo debe llevarse a cabo mediante un enfoque gradual, inclusivo y orientado al consenso, con un alcance claramente definido. Las futuras discusiones deberían tener en cuenta la viabilidad, la proporcionalidad, las implicaciones para la implementación, la diversidad de categorías de bebidas alcohólicas y los diferentes contextos regulatorios nacionales de los Miembros.

Brasil apoya que este trabajo se centre, según corresponda, en la revisión o modificación de los textos pertinentes existentes del Codex, incluidos el CXS 1-1985, el CXG 2-1985 y el CXG 23-1997. Se podría prestar especial atención a:

- aclarar la aplicación del CXS 1-1985 a las bebidas alcohólicas, con el fin de proporcionar una mayor seguridad jurídica y apoyar una implementación más coherente entre los Miembros;
- considerar disposiciones sobre la declaración del grado alcohólico y, cuando corresponda, información que pueda ayudar a los consumidores a comprender la cantidad de alcohol presente en el producto, sujeto a futuras discusiones técnicas;
- considerar de qué manera los textos del Codex podrían abordar la información relacionada con la salud, incluidas advertencias cuando corresponda, permitiendo al mismo tiempo que los Miembros discutan el alcance, el formato, la viabilidad y la implementación de cualquier disposición futura;
- considerar cómo debería abordarse la información relacionada con la nutrición para las bebidas alcohólicas, asegurando que dicha información se presente de manera neutral y no implique beneficios para la salud ni fomente el consumo;
- desarrollar disposiciones específicas para el alcohol destinadas a evitar que las declaraciones nutricionales y de propiedades saludables induzcan a error a los consumidores o impliquen que las bebidas alcohólicas son beneficiosas o constituyen opciones más saludables.

Brasil considera que las cuestiones relacionadas con el uso de tecnologías para proporcionar información alimentaria deberían abordarse, de ser necesario, de manera coherente con las orientaciones recientemente adoptadas por el Codex, evitando la duplicación o la reapertura de cuestiones ya acordadas por el CCFL.

Brasil también considera que este trabajo debería tomar en consideración los trabajos pertinentes realizados por otras organizaciones internacionales, evitando duplicaciones y garantizando la coherencia cuando corresponda.

Por último, Brasil apoya el establecimiento de un grupo de trabajo electrónico presidido por Tanzania, con la participación de los Miembros y Observadores interesados, para continuar desarrollando el trabajo propuesto con miras a su consideración por el CCFL.

Burundi

Burundi supports the initiation of new work on the application of Codex labelling provisions to alcoholic beverages, recognizing that current Codex texts do not adequately address this product category. Harmonized guidance would improve consumer information, reduce inconsistencies across markets, and provide flexibility for national regulatory contexts.

Burundi endorses the establishment of an Electronic Working Group (EWG) chaired by Tanzania, with participation open to all interested Members and Observers, to prepare draft amendments and revisions to the General Standard and relevant guidelines for consideration by CCFL50. This approach ensures a structured, inclusive, and scientifically grounded process for developing practical labelling provisions for alcoholic beverages.

Cabo Verde

POSITION

Cabo Verde supports the approval of the new work proposal for the establishment of specific labeling requirements for alcoholic beverages. We endorse the phased approach as proposed:

Phase 1: Mandatory declaration of alcohol content (ABV) and the inclusion of clear, visible health warnings (e.g., pregnancy, driving, and chronic disease risks) on the physical label.

Phase 2: Strict prohibition of health claims that suggest alcohol consumption is beneficial or "healthier".

Phase 3: Development of rules for nutritional labelling (energy/calories), ensuring that such information is presented neutrally and not used for marketing purposes.

RATIONALE

Our position is grounded in the protection of public health and the consumer's right to information. Alcohol is not a common food item; it has a proven causal link to seven types of cancer and contributes to millions of deaths annually.

As a country that relies significantly on food imports, Cabo Verde considers international harmonization of these standards vital for:

Official Control: Providing a clear legal framework for customs verification and market surveillance by the competent authorities.

Transparency: Preventing the use of "health halos" through terms like "gluten-free" or "low calorie" that may lead consumers to underestimate health risks.

Regulatory Consistency: This stance aligns with Cabo Verde's commitment to scientific rigor and the protection of vulnerable groups, ensuring that no "regulatory gaps" are used to omit essential health information.

El Salvador

TEMA 8ª): Propuesta de nuevo trabajo sobre la aplicación de las disposiciones sobre el etiquetado de alimentos a las bebidas alcohólicas

Comentarios generales:

El Salvador agradece el documento CCFL preparado por el Grupo de Trabajo Electrónico, presidido por Tanzania, encargado del tema.

El Comité Espejo del Codex sobre Etiquetados de los Alimentos (CCFL) ha revisado el Apéndice III:

El Salvador está de acuerdo con la primera recomendación de iniciar nuevos trabajos sobre el etiquetado de las bebidas alcohólicas con el fin de enmendar/revisar los textos pertinentes del Codex, tal como se detalla en el documento de proyecto que figura en el Apéndice III.

El Salvador está de acuerdo con la segunda recomendación sobre establecer un grupo de trabajo electrónico (GTe) presidido por Tanzania, con la participación de los miembros y observadores interesados, para elaborar un proyecto de las enmiendas y revisiones propuestas a la norma general y las directrices pertinentes, con vistas a su análisis por parte del CCFL en su 50.ª reunión.

Justificación:

Conforme a los debates sostenido referentes a la armonización internacional y el proyecto de desarrollo de disposiciones específicas sobre el etiquetado de bebidas alcohólicas, mediante la revisión y armonización de la Norma general para el etiquetado de los alimentos preenvasados CXS 1-1985, Directrices sobre etiquetado nutricional CXG 2-1985 y Directrices para el uso de declaraciones nutricionales y saludables CXG 23-1997, El Salvador apoya el inicio de dicho proyecto con el fin de lograr normativas internacionales que reduzcan los riesgos para el consumidor en la comercialización de las bebidas alcohólicas.

Ante la falta de estandarización en la comercialización de las bebidas alcohólicas es necesario destacar que esto puede generar desinformación al consumidor y crear barreras en el comercio, debido a la gran diversidad de regulaciones nacionales y a la ausencia de criterios claros sobre información esencial como contenido alcohólico, listado de ingredientes, declaraciones nutricionales y saludables y sobre las advertencias sanitarias sobre el consumo de bebidas alcohólicas, considerando la evidencia en materia de salud pública que correlaciona la incidencia del consumo de bebidas alcohólicas y el padecimiento de enfermedades no transmisibles como el cáncer y las enfermedades hepáticas.

El Salvador considera que al contar con un marco de referencia mundial específico para la presentación de información en el etiquetado de bebidas alcohólicas permitirá:

- **Estandarizar la información clave**, garantizando transparencia sobre el contenido alcohólico, declaraciones de información nutricional y los riesgos para la salud.
- **Regular o limitar las declaraciones de propiedades saludables**, evitando inducir a error al consumidor respecto a productos que, por su naturaleza, no aportan beneficios nutricionales.
- **Reducir la fragmentación normativa internacional**, facilitando el comercio y especialmente la participación de pequeños productores.
- **Fortalecer la protección de la salud pública**, alineando el etiquetado con la evidencia científica y las recomendaciones internacionales.

Asimismo, dichas disposiciones limitarán el uso de herramientas como códigos QR que no permite el acceso inmediato del consumidor a información clara y comprensible, dichos elementos deberán considerarse únicamente como complementarios y no sustituir la información obligatoria visible en la etiqueta.

Comentarios específicos: N/A

The European Union

Mixed Competence

European Union Vote

The European Union and its Member States (EUMS) would like to thank Tanzania for the discussion paper for new work on the application of food labelling provisions to alcoholic beverages (CX/FL 26/49/8 Add. 1).

As confirmed by the Codex Secretariat, the existing General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and the Guidelines on Nutrition labelling (CXG 2-1985) apply to all prepackaged foods, including alcoholic beverages. Alcoholic beverages fall under the definition of 'food' and are therefore subject to the same requirements as other foods under these two Codex texts.

The EUMS are of the opinion that the requirements are sufficiently clear in the above Codex texts. They note the general principle enshrined in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) that pre-packaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect. They consider amongst others that the existing provisions on servings, the nutrient declaration (such as the calculation of the energy content from ethanol), languages and presentation of mandatory information are sufficiently specific and clear.

The EUMS consider also that the recently adopted Guidelines on the use of technology to provide food information in food labelling (CXG 105-2024) apply likewise to all prepackaged foods including alcoholic beverages.

The EUMS note however that the indication of the alcohol content of alcoholic beverages (alcohol by volume/alcohol strength) is not addressed in Codex texts. As this indication is an important information for consumers to enable them to make informed choices, the EUMS support work on the labelling of alcohol content on alcoholic beverages, taking into account the existing recommendations of the International Organisation of Vine and Wine (OIV).

The EUMS note furthermore that, as regards nutrition and health claims, alcoholic beverages are subject to the same requirements as other foods under the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23/1997), as they fall under the definition of 'food'. In the EU, Regulation (EC) No 1924/2006 on nutrition and health claims made on foods provides that beverages containing more than 1,2 % by volume of alcohol cannot bear health claims and that, as far as nutrition claims are concerned, only nutrition claims referring to low alcohol levels, or the reduction of the alcohol content, or the reduction of the energy content for beverages containing more than 1,2 % by volume of alcohol, are permitted. The EUMS are therefore in favour of work on restrictions on nutrition and health claims on alcoholic beverages.

The EUMS are therefore of the opinion that CCFL could consider work on:

- the labelling of alcohol content on alcoholic beverages in % by volume alcohol through the modification of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), taking into account the existing recommendations of the International Organisation of Vine and Wine (OIV),
- restrictions on positive nutrition and health claims on alcoholic beverages through the modification of the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23/1997).

India

India appreciates and supports the work done by Tanzania, WHO & other member countries for drafting discussion paper.

Japan

Japan acknowledges the action plan, adopted by the 75th World Health Assembly, to effectively implement the global strategy to reduce the harmful use of alcohol as a public health policy priority and appreciates the efforts to explore the possibility for CCFL to contribute to the action plan through this proposal.

However, Japan is not in a position to support the initiation of new work on the application of food labelling provisions to alcoholic beverages, including the revision of the current CCFL standards and related texts.

First, we do not see the need for CCFL to proceed work on the application of food labelling provisions to alcoholic beverages. While we note that definition, classification, and laws and regulations for productions, distributions and sales of alcoholic beverages vary across countries/regions, we are not aware of concrete evidence that such diversity has led to significant impediments to international trade. In this context, we are of the view that requirements for each type of alcoholic beverage (name, ingredients, labelling, etc.) should be basically addressed through national/regional laws and regulations or voluntary standards set by relevant industry bodies.

Second, we are of the view that the existing CCFL standards and related texts already provide sufficient and appropriate guidance for competent authorities in formulating labelling requirements for alcoholic beverages. Hence, we believe that initiating new work in this may not be the most effective use of the CCFL's limited resources at this stage.

For the reasons stated above, Japan is not in a position to support this proposal.

Nigeria

Nigeria appreciates the work done by the Electronic Working Group (EWG) Prepared by Tanzania with assistance of Barbados, Botswana, Eswatini, Ghana, Jamaica, Madagascar, Saint Lucia, Seychelles, Uganda and World Health Organization

Nigeria supports the progression and discussions on the new work on food labelling provisions to the alcoholic beverages.

Rationale:

For public health considerations

The Republic of Korea

While the Republic of Korea recognizes the importance of establishing labelling regulations for alcoholic beverages, the Republic of Korea is of the view that, given the significant divergence in relevant regulations across member countries, it would be necessary to sufficiently hear and thoroughly discuss the diverse views of all member countries before proceeding further.

Senegal

Contexte :

. La 43e réunion du Comité du Codex sur l'étiquetage des aliments (CCFL43, 2016) a décidé d'étudier les possibilités d'orientation et de travail futurs du CCFL. Il a été convenu que le Canada préparerait un document

résumant les travaux précédemment identifiés qui n'ont pas été poursuivis, et qu'il présenterait les travaux en cours et les propositions pour les travaux futurs. Le CCFL a également convenu que le document serait actualisé à chaque session et qu'une délégation différente en assumerait la responsabilité à chaque fois.

. Les participants à la 47^{ème} session du CCFL sont convenus de maintenir le point de l'étiquetage des boissons alcoolisées inscrit à l'ordre du jour et demander à l'OMS de préparer un document de travail pour examen lors de la 48^{ème} session du CCFL.

. Lors de la 48^e session du Comité du Codex sur l'étiquetage des denrées alimentaires (CCFL48), l'OMS a présenté un document de travail sur l'étiquetage des boissons alcoolisées et les résultats de l'analyse des réponses à CL 2024/13– FL ont été discutés. Ces documents indiquent que les travaux du CCFL sur l'alcool devraient porter sur la révision et la modification de la norme générale et des directives afin de fournir aux membres des renseignements clairs, précis et transparents sur l'étiquetage des boissons alcoolisées.

. Le CCFL48 a également décidé que le Secrétariat du Codex publierait une lettre circulaire demandant aux membres et aux observateurs de fournir de nouveaux thèmes de travail ou des questions émergentes à inclure dans le document. Le Secrétariat du Codex a publié la lettre circulaire CL 2025/42-FL en mai 2025 et l'a ouverte jusqu'au 15 janvier 2026.

. Sur la base de ce résultat, lors de la réunion du CCFL48, le Comité a décidé d'inclure l'étiquetage des boissons alcoolisées dans l'inventaire des travaux futurs, dans l'attente de la présentation d'un document de projet et de la confirmation d'un pays membre désireux de mener l'initiative¹.

Position :

Le Sénégal est d'avis pour la poursuite des travaux sur l'étiquetage des boissons alcoolisées afin de modifier notamment la NGE PAP ainsi que les Directives pertinentes pour examen par le CCFL50.

Justification :

Pour une meilleure prise en charge de la consommation des boissons alcoolisées notamment par les couches les plus vulnérables, il est judicieux de réviser la NGE PAP sur les points relatifs aux renseignements obligatoires, au nom de la denrée alimentaire, la déclaration de contenu, la lisibilité et la présentation. Les principales révisions nécessaires devraient également porter sur règles relatives à la teneur en alcool, la limitation de l'âge, les formats et les avertissements relatifs à la santé.

Le débat sur l'étiquetage des boissons alcoolisées met en évidence la nécessité de trouver un équilibre entre la santé publique, les droits des consommateurs et des pratiques commerciales loyales. La consommation de boissons alcoolisées par les adolescents requiert un encadrement strict notamment les aspects relatifs aux formats, au titrage ou teneur en alcool pour juguler ce fléau.

United Republic of Tanzania

The United Republic of Tanzania (URT) supports the initiation of new work on the application of Codex labelling provisions to alcoholic beverages, recognizing that current Codex texts do not adequately address this product category. Harmonized guidance would improve consumer information, reduce inconsistencies across markets, and provide flexibility for national regulatory contexts.

The United Republic of Tanzania endorses the establishment of an Electronic Working Group (EWG) chaired by Tanzania, with participation open to all interested Members and Observers, to prepare draft amendments and revisions to the General Standard and relevant guidelines for consideration by CCFL50. This approach ensures a structured, inclusive, and scientifically grounded process for developing practical labelling provisions for alcoholic beverages.

Zambia

Zambia recognizes the public health significance of alcohol consumption, its associated effects, and the potential value of clearer application of Codex labelling provisions in this area.

At the same time, Zambia wishes to highlight that, despite the importance of this issue, views among Members are not yet fully aligned, particularly regarding the appropriate scope and content of this proposed work. While a degree of harmonisation under Codex may be beneficial, it is essential to clearly define what elements should be harmonised and what should remain within national jurisdiction. This is especially important given that several countries are already implementing national regulatory measures on alcohol labelling, underscoring the need for a measured and carefully scoped approach.

Zambia notes that the effects of alcohol are well understood and experienced across all regions. However, Codex must remain appropriately focused. Alcoholic beverage labelling sits at the intersection of consumer information, public health policy, and national regulatory frameworks, which vary significantly across countries.

As such, there is a real risk that overly broad or prescriptive provisions could create implementation challenges and unintended trade implications, particularly for developing countries.

In this regard, Zambia considers that Codex should prioritise areas where it can add clear value namely, harmonised labelling provisions that enhance transparency and facilitate trade while avoiding areas more appropriately addressed at the national level, such as specific public health messaging or regulatory controls.

Zambia therefore calls for further discussion to better define the scope of this work, with a view to identifying those elements suitable for Codex guidance, while fully respecting national policy space.

Fédération internationale des vins et des spiritueux (FIVS)

I. BACKGROUND

On 9 March 2026, a Discussion Paper for New Work on the Application of Food Labelling Provisions to Alcoholic Beverages (CX/FL 26/49/8 Add.1) was published by the Codex Committee on Food Labelling (CCFL).

The paper was drafted by an informal Working Group composed of Barbados, Botswana, Eswatini, Ghana, Jamaica, Madagascar, Saint Lucia, Seychelles, Tanzania, Uganda and the World Health Organization (WHO). It will be discussed at the 49th Session of the Codex Committee on Food Labelling (CCFL49), taking place 11–15 May 2026 in Ottawa, Canada, under agenda item 8 Future work and emerging issues.

Since 2016, several proposals have sought to introduce new Codex work on alcohol labelling. Most recently, at CCFL48 (October 2024), Codex Members considered a WHO proposal on this field. While there were some delegations who expressed support for undertaking new work in relation to alcohol labelling, other delegations were not in favour as they believed that the current labelling provisions, in CXS 1-1985 and CXG 23-1997 adequately covered the mandatory labelling provisions in relation to alcohol since alcohol falls under the definition of food. No consensus was reached, and the proposal was placed on the Future Work Agenda.

FIVS has contributed actively to CCFL meetings on this topic going back to the CCFL44 meeting in 2017 in Paraguay. We have issued two conference room documents¹ and our view that work in this area would be unnecessary and/or duplicative has not changed.

II. GENERAL COMMENTS ON THE MARCH 2026 DISCUSSION PAPER

The work proposed in CX/FL 26/49/8 Add.1 is unnecessary and duplicative as existing Codex Alimentarius standards and guidance on food labelling already apply to alcoholic beverages and are fit for purpose, with established implementation across many jurisdictions. If there are gaps in some Codex Member States regulations, national policies may be developed to implement the existing Codex standards on food labelling. This point was highlighted in the CCFL 48 report². In addition, the proposed health warnings fall within the remit of national authorities and are appropriately regulated at that level.

The discussion paper proposes Codex work in areas outside its scope and that may impact international trade. The potential impact should be considered as it is estimated that 47% of wine is consumed outside its country of origin³. The sustainability of the industry relies on export markets, and the sector is well versed in adapting labels to meet the requirements of the importing market, even when requirements differ.

Consumers want access to wine and wine products and these products play an important role in the social-economic fabric of many nations. FIVS wishes to work constructively to enhance labelling information for consumers, though this work must add value, avoid duplication and respect areas which clearly fall within the mandate of national governments. Any food product has the potential to be consumed inappropriately, and alcoholic beverages are no exception. Nevertheless, addressing inappropriate use is not part of the Codex mandate.

III. FIVS POSITION: NEW WORK AT CODEX IS UNNECESSARY

FIVS considers that new Codex work to introduce alcohol-specific provisions into existing labelling standards is unnecessary and duplicative of existing Codex guidance and national regulations.

A. WINE AND ALCOHOL BEVERAGES ARE ALREADY COVERED BY CODEX

¹ [FIVS CRD17](#), CCFL44, 2017; [FIVS CRD45](#), CCFL48 2024.

² [CCFL48 Report](#), paragraph 163 (c).

³ [OIV Press Conference, 25 April 2025, State of the Vine and Wine Sector](#).

Wine and other alcoholic beverages fall under the Codex definition of food products, as defined in the Codex Procedural Manual⁴. This interpretation was reaffirmed by Members at CCFL48 in 2024⁵.

As food products, wine and other alcohol beverages are already covered by well-established Codex texts, including:

- [General Standard for the Labelling of Prepackaged Foods CXS 1-1985 \(GSLPF\)](#)
- [Guidelines on Nutrition Labelling \(CXG 2-1985\)](#)
- [Guidelines for Use of Nutrition and Health Claims \(CXG 23-1997\)](#)
- [Guidelines On The Use of Technology To Provide Food Information in Food Labeling \(CXG 105-2024\)](#)

These guidelines and standards set out requirements for ingredient listing, allergen declaration, nutrition labelling, claims and consumer protection, and use of digital labels, and remain available for Codex Members adoption at a national level for all foods including alcoholic beverages.

They also stipulate that food products, including alcoholic beverages, should not be presented in a manner that is false, misleading, deceptive or in a way that is likely to create an erroneous impression regarding its character in any respect.

B. EXISTING CODEX STANDARDS ARE BEING IMPLEMENTED AND ARE FIT FOR PURPOSE

Many Codex Member governments already require labelling of alcoholic beverages in line with Codex principles. These include mandatory or voluntary requirements covering:

- Allergen declarations
- Nutrition information
- Ingredient lists

According to the World Trade Organization's [Trade Concerns Database](#), at least 11 countries have notified changes to alcoholic beverage labelling since 2010. More have notified changes to food labelling that also impact alcoholic beverage labelling. This demonstrates that the countries have a framework that is workable and adaptable at a national level and there is scope for them to be applied more widely when national governments see the need to do so.

In parallel, the labelling of wine and spirits of vitivinicultural origin is thoroughly covered and harmonised by the International Organisation of Vine and Wine (OIV), which comprises 51 member countries accounting for 88% of global wine production and 75% of global wine consumption.

The OIV labelling guidelines are benchmarked against the Codex General Standard on Labelling of Prepackaged Food CXS-1 1985, ensuring consistency with the international food labelling framework.

C. HEALTH WARNINGS ARE REGULATED BY NATIONAL AUTHORITIES

Codex's primary mandate is to protect consumer health and ensure fair practices in food trade, based on scientific assessment of food safety and quality.

Mandatory health warnings on alcohol do not relate to product safety in the Codex sense (e.g., contamination, allergens, foodborne risk) and they are broader public health policy tools. Such measures to tackle harmful use are best determined by national governments, which can take into account:

- Cultural and societal context
- National public health priorities
- Existing alcohol control policies
- Enforcement capacity
- Most effective media for public awareness

⁴[31st Procedural Manual \(2025\), page 20](#): Food means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances used only as drugs.

⁵[CCFL48 Report, paragraph 161](#): There was broad recognition that alcoholic beverages were covered under the Codex definition for food, and that they could be addressed within the mandate of Codex.

This approach is consistent with the WHO's Global Alcohol Action Plan 2022-2030⁶, which relies on member states to implement policy objectives:

(...) Member States have the primary responsibility for the development, implementation, monitoring, and evaluation of public policies to reduce the harmful use of alcohol according to their national needs and contexts.

Maintaining this balance protects both national sovereignty and the credibility of Codex.

IV. CONCLUSION

- 1. Alcohol beverages are already covered by Codex food labelling standards and new work would be unnecessary and/or duplicative.**
- 2. Many governments already require alcohol labelling in line with Codex standards and guidelines. The lack of implementation of Codex standards is not a failure of Codex but rather an active choice of governments.**
- 3. Alcohol health warnings are national public health policy tools, not in Codex's mandate.**

The International Organisation of Vine and Wine (OIV)

This document does not commit Member States of the OIV in the comments and views that they might provide or express separately

The role of the OIV

The OIV as the international intergovernmental organisation with responsibility for the scientific and technical aspects of wines, vitivinicultural spirituous beverages and other alcoholic beverages of vitivinicultural origin has a well-developed corpus of technical and scientific work regarding such products. OIV recommendations are based on consensus between its 51 member countries representing 75% of global vineyard surface area, 87% of global wine production and 71% of global wine consumption.¹ All OIV member countries are members of Codex Alimentarius.

It is important to draw attention again to the existence of the OIV recommendations on the labelling of wines and spirituous beverages of vitivinicultural origin and the desirability of avoiding duplication at the international intergovernmental level.

The OIV also emphasise the high complexity of the labelling requirements for such products, which is compounded by the fact that they are seasonal agricultural products with many geographical and cultural specificities and with potentially very long shelf life.

In the OIV's view, there would appear to be little benefit in duplicating the existing works on these subjects, but the OIV stands ready to assist if the members of the Codex Committee decide otherwise.

Recognition of the importance of consumer information

The OIV recognises the work undertaken by WHO and the importance of ensuring that consumers receive clear, accurate and relevant information.

The OIV has long contributed to this objective through its standards and recommendations, including work addressing harmful patterns of alcohol consumption and promoting responsible communication and consumption patterns, in alignment with international public health objectives.

Existence of comprehensive OIV standards and ongoing work

The OIV has established a comprehensive and longstanding body of international standards for the labelling of wines and spirituous beverages of vitivinicultural origin.

The International Standard for the Labelling of Wines was initially adopted in 1983 and has been regularly updated to reflect scientific, technical and regulatory developments, notably concerning vintage or harvest year, ageing, identification of the responsible operator, name of the viticultural holding, varietal name, and the introduction of provisions on e-labelling, nutritional declaration and information about ingredients.

The International Standard for the Labelling of Spirituous Beverages of Vitivinicultural Origin was first adopted in 1991 and continuously updated, notably concerning nutritional declaration and information about ingredients, ensuring alignment with evolving scientific, technical and regulatory practices.

⁶ [Global Alcohol Action Plan 2022-2030, paragraph 37.](#)

These standards are inspired by the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and constitute a specialised and internationally recognised framework reflecting the specific characteristics of vitivinicultural products.

A further update is in progress, addressing health-related information for alcoholic beverages of vitivinicultural origin.

The OIV standards:

- are based on Codex principles,
- have been regularly updated,
- and reflect scientific, technical and regulatory developments at international level.

The OIV standard specifies mandatory information that must appear on labels of pre- packed wines and spirituous beverages intended for consumer sale. This includes:

- product definition and denomination,
- geographical indications and appellations of origin,
- alcoholic strength,
- allergens and hypersensitivity substances,
- net contents
- country of origin,
- identification of the responsible operator,
- batch identification and traceability elements,

The latest update introduces several new provisions on e-labelling, ingredients and nutritional information, indicating that Member States

- may authorise the use of electronic labels (e-labels) to display certain mandatory and optional information, provided that a clear and direct link appears on the physical label indicating which information is available electronically.
- may require the mandatory display of a nutrition declaration in accordance with national regulations. This declaration may be provided in full, but they may also limit the information on the label to the energy value only. The full nutrition declaration may be made available via e-labels, provided that the energy value remains indicated on the label.
- May require the display of the list of ingredients on the label, including all ingredients, while also authorising the possibility of providing this list through e-labels.

Other optional information is included such as: Trademarks, responsible, name of the viticultural holding, varietal name, vintage, type of wine (considering the OIV sugar content), ageing, terms of quality, distinctions and medals.

In addition, the OIV is currently advancing work on health-related information for labelling, tailored to wines and spirituous beverages of vitivinicultural origin. This work is based on a compilation of national approaches and reflects a growing interest among Member States in providing appropriate and harmonised consumer information.

Recognition of product specificity

The OIV underlines that wines and spirituous beverages of vitivinicultural origin present specific characteristics that are already reflected in dedicated standards.

If Codex decides to proceed with a specific standard for the labelling of alcoholic beverages, then the OIV draws attention to a number of particularities for the labelling of wines and vitivinicultural spirits such as:

- geographical indications and appellations of origin,
- grapevine varieties,
- vintage and ageing information,
- specific product definitions and classifications,
- Ingredients and nutritional information.

- and long shelf-life considerations.

Finally, the OIV has adopted definitions for the different categories of vitivinicultural products in the *International Code of Oenological Practices*. These definitions are widely adopted in OIV member countries and beyond. The Codex GSFA itself refers to the OIV definition of “wine”.

With respect in particular to the labelling of “low alcohol drinks”, the OIV has adopted definitions of partially de-alcoholised wines with an alcohol by volume of between 0.5 and 7.5 % Vol. and de-alcoholised wine < 0.5 % Vol which would need to be taken into account..

Ensure normative coherence

The OIV supports the objective of improving transparency and consumer information in the labelling of alcoholic beverages at international level.

At the same time, The OIV emphasises that:

- the substantial body of work already developed by the OIV should be fully taken into account,
- duplication of existing international standards should be avoided,
- and international coherence should be preserved through alignment rather than parallel development.

The OIV considers that any new work undertaken by the Codex Committee on the labelling of alcoholic beverages should duly take into account the substantial body of work already developed at the international intergovernmental level by the OIV. In this context, the OIV remains fully available to contribute, within its field of competence, to Codex discussions, with a view to avoiding any risk of duplication or inconsistency and to drawing on its specialised expertise.

NCD Alliance

NCD Alliance commends the leadership demonstrated by Tanzania, Barbados, Botswana, Eswatini, Ghana, Jamaica, Madagascar, Saint Lucia, Seychelles, Uganda, and the World Health Organization (WHO) in proposing this new work. **We fully endorse the proposal to amend and revise relevant Codex texts to ensure that the application of food labelling provisions to alcoholic beverages is clear, consistent, and effective for the protection of consumer health.**

We explicitly support the proposed three-phase and horizontal approach for a coherent standard revision, as well as the establishment of an Electronic Working Group (EWG) to execute this process. This collaborative framework is essential to address current interpretation gaps that undermine both public health and trade objectives. **We therefore call on all other Codex Members to support this critical new work.**

At CCFL47, the Codex Secretary confirmed that existing labelling texts apply to alcoholic beverages; however, how they apply remains ambiguous, leading to inconsistent national approaches. This lack of clarity creates uncertainty regarding the permissibility of and considerations for health-related information on alcoholic beverages, hindering consumers’ ability to make informed, health-conscious choices.

Alcohol is a leading risk factor for the global burden of disease, contributing to over 200 health conditions, including noncommunicable diseases (NCDs) such as cardiovascular diseases, liver conditions, and cancers. The WHO highlights that there is no safe level of alcohol consumption. Despite this, there is a significant lack of public awareness regarding these risks. **It is therefore crucial for Codex Members to have clear guidance on how to label these products effectively. This includes clarifying how food labelling provisions (e.g. ingredient and nutrition declarations) apply to these products, what specific requirements shall or could be considered for alcoholic beverages (such as claim restrictions and health warnings), and how to deal with emerging practices on alcoholic beverages labelling (off-label vs on-label information),** ensuring accurate consumer and health information is provided in a clear and accessible manner. For instance, young people should not have to search for basic health information about alcohol. Moreover, clear alcohol labelling can support more effective conversations with individuals in clinical settings.

Beyond the public health imperative, consumers have a fundamental right to accurate information about the products they purchase. The current lack of standardized labelling creates a market that can mislead consumers, leaving them unaware of key information on alcoholic beverages compared with other food products. This disparity violates the principles of fair trade and informed consumer choice. The Codex Alimentarius was established to protect consumer health and ensure fair practices in food trade. This current fragmentation in labelling requirements creates unnecessary logistical complexity and costs for international trade.

The NCD Alliance urges Codex Members to support the establishment of the EWG and proceed with the initiation of this critical new work, and to ensure that it proceeds with the breadth and ambition

required to deliver meaningful public health impact, while empowering consumers, and fostering fair and harmonized trade as well.

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