

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8.2

FL49/CRD18

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

Ottawa, Canada

11 – 15 May 2026

PROPOSAL FOR NEW WORK ON A GUIDING DEFINITION FOR A MORE UNIFORM APPLICATION OF LABELLING PROVISIONS TO “SMALL PACKAGES” AND THEIR RELATED EXEMPTIONS SET IN EXISTING CODEX TEXTS

Comments by Burundi, Kenya, Nigeria, and United Republic of Tanzania

Burundi

Burundi supports the development of a guiding definition for “small packages” and associated labelling exemptions. A clear, harmonized definition will promote consistency across Codex texts, facilitate compliance, and support enforcement, while ensuring that exemptions are applied in a transparent and proportionate manner that considers practical constraints without compromising essential consumer information.

Burundi also supports the issuance of a Codex Circular Letter (CL) to invite proposals on new work or emerging issues, enabling CCFL to develop standards that respond to stakeholder needs and provide a common understanding of terminology used in food labelling.

Kenya

Kenya supports the development of a guiding definition for “small packages” and associated labelling exemptions. A clear, harmonized definition will promote consistency across Codex texts, facilitate compliance, and support enforcement, while ensuring that exemptions are applied in a transparent and proportionate manner that considers practical constraints without compromising essential consumer information.

Kenya also supports the issuance of a Codex Circular Letter (CL) to invite proposals on new work or emerging issues, enabling CCFL to develop standards that respond to stakeholder needs and provide a common understanding of terminology used in food labelling.

Nigeria

Nigeria appreciates the International Chewing Gum Association (ICGA) for preparing the discussion paper and supports the proposal for new work, subject to the following comments:

- i. New definition for “small packages” should remain consistent with the existing 10cm² threshold for “small units” to avoid confusing manufacturers.
- ii. There is need to explicitly state allergen declarations and date markings regardless of package size.
- iii. Electronic Working Group (EWG) for the new work to take into account the packaging formats commonly used across different regions, including sachets and other small-format packaging widely used in African markets, when considering how surface area and labelling feasibility are assessed.

Rationale:

Nigeria supports this work to resolve the regulatory confusion and cross-border inconsistencies caused by the current lack of a standardized ‘small package’ definition. This ambiguity results in inconsistent labeling standards and uneven enforcement. It creates unnecessary hurdles for regulatory bodies and food producers, especially SMEs that depend on budget-friendly, small-scale packaging.

Adopting a Codex-guided definition would foster greater consistency in food labeling enforcement, create more equitable and stable trade environments, and minimize the likelihood of products facing varied regulatory hurdles due to inconsistent definitions.

United Republic of Tanzania

The United Republic of Tanzania (URT) supports the development of a guiding definition for “small packages” and associated labelling exemptions. A clear, harmonized definition will promote consistency across Codex texts, facilitate compliance, and support enforcement, while ensuring that exemptions are applied in a transparent and proportionate manner that considers practical constraints without compromising essential consumer information.

The United Republic of Tanzania also supports the issuance of a Codex Circular Letter (CL) to invite proposals on new work or emerging issues, enabling CCFL to develop standards that respond to stakeholder needs and provide a common understanding of terminology used in food labelling.