

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1- 1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS (STEP 4)

Comments in reply to CL 2026/08-FL

Submitted by:

Australia, Brazil, Canada, Colombia, Costa Rica, Ecuador, Egypt, European Union, Indonesia, Malaysia, Morocco, New Zealand, Peru, the Republic of Korea, South Africa, Thailand, The United States of America (USA), Vanuatu, Zambia and Association Of European Coeliac Societies (AOECS), Food Industry Asia, FoodDrinkEurope, International Council of Beverages Associations (ICBA), International Chewing Gum Association (ICGA), International Council of Grocery Manufacturers Associations (ICGMA), The European Federation of the Associations of Dietitians (EFAD)

Background

This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2026/08-FL¹ issued in March 2026. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCFL>

ANNEX

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>Australia would like to thank the EWG Chair Colombia and Co-chairs Canada, India and Jamaica for the progress made on the draft amendments to the GSLPF. Subject to CCFL49 consideration and resolution of outstanding matters Australia supports advancing this work to Step 5.</p> <p>As a general comment, Australia suggests the Chairs consider whether the terms 'inner units' and 'individually packaged food' are used to convey the same meaning within the proposed amendments, and consider whether the term 'inner units' can be replaced with 'individually packaged food' to promote consistency and clarity.</p> <p>Australia has the following specific comments on the draft amendments.</p>	Australia
<p>Brazil thanks Colombia, as Chair of the EWG, and Canada, India and Jamaica, as Co-Chairs, for the work undertaken and supports the advancement of the draft amendments to the GSLPF regarding foods sold in joint presentation and multipack formats.</p> <p>Brazil considers that the proposed amendments improve clarity on how the GSLPF applies to these products without requiring amendments to the definition section.</p>	Brazil
<p>Canada thanks the EWG, chaired by Colombia, for the progress made in developing draft amendments to the General Standard for the Labelling of Pre packaged Foods (CXS 1 1985) for foods sold in multipack and joint presentation formats.</p> <p>Canada agrees with the EWG conclusion that no new definitions (e.g., for "multipack" or "joint presentation") are needed, since the draft section 8.1.3.1 adequately captures these concepts by describing these types of containers. This approach avoids unintended consequences that could arise from revising long standing Codex definitions.</p> <p>Canada also supports the note that inner packages within multipacks or foods sold in joint presentation fall outside the scope of this work. If such packages are sold individually, they must fully comply with all GSLPF requirements</p> <p>Canada supports this work to moving forward in the step process pending discussions at CCFL49 and offers the following comments.</p>	Canada
<p>Costa Rica agradece el trabajo realizado por el GTe y los avances alcanzados en la aclaración de las secciones 4.2.1, 4.3.4, 4.7.1 y 8.1.3.1 propuestas para enmienda de la NGEAP. En ese sentido, considera que en general, se han atendido los aspectos señalados durante los debates del GTe.</p> <p>Únicamente se propone un ajuste de redacción en el apartado 4.7.1.</p>	Costa Rica
<p>El país considera que los criterios emitidos en el documento están muy bien estructurados y recogen las consideraciones que se han venido abordando en trabajos anteriores, por lo que se apoya las propuestas de las enmiendas de las secciones 4.2.1, 4.3.4, 4.7.1 y 8.1.3.1 de la NGEAP para incluir las disposiciones pertinentes a los formatos de presentación conjunta y envases múltiples que figuran en el Apéndice I. El texto planteado entre corchetes, se considera que sí es necesario ya que, permitirá brindar más claridad al consumidor.</p>	Ecuador
<p>Egypt supports to include the provisions relevant to joint presentation and multipack formats were be as a new text on sections 4.2.1, 4.3.4, 4.7.1, and 8.1.3.1.</p> <p>Egypt supports the new text in square brackets under section 8.1.3.1, whereas this text give more clear meaning relevant to the name and address of the packer, distributor, importer, exporter or vendor of the pre-packed food sold as a single unit.</p>	Egypt

<p>The European Union and its Member States (EUMS) would like to thank Canada for the proposed draft amendments to the General Standard for the Labelling of Pre-packaged Foods (GSLPF) (CXS 1- 1985) related to joint presentation and multipack formats as presented in Appendix I to CX/FL 26/49/6</p> <p>The EUMS would like to reiterate that they are supportive of the general principle of an obligation to indicate a mandatory food information particular on the outer packaging when that particular is obscured by the outer packaging or not readily legible on at least one of each type of the individually packaged foods. The EU considers therefore that the overall aim of this exercise is to clarify how mandatory food information should be given in the case of joint presentations and multipack formats, and not to establish additional mandatory food information particulars for joint presentations and multipack formats.</p>	European Union
<p>FIA supports the proposed Section 4.2.1 (bis), 4.3.4 and 4.7.1 relating to the list of ingredients, net content and drained weight, and date marking and storage instructions for prepackaged foods in joint presentation and multipack formats. These provisions provide appropriate labelling flexibility and are aligned with the overall requirements of the General Standard for the Labelling of Pre-packaged Foods (GSLPF). FIA would also appreciate further clarity on the scope of Section 8.1.3.1. The provision refers to “individually packaged food”, but as this term is not defined (unlike “pre-packaged food”), additional clarification would be helpful to ensure consistent interpretation. For example, it would be useful to confirm whether a bag of candies where each candy is additionally wrapped in clear plastic falls within the scope of Section 8.1.3.1, noting that the same candies sold in a bag without the additional individual clear wrappers may not fall within scope.</p>	Food Industry Asia
<p>The International Chewing Gum Association (ICGA) would like to thank and commend the leadership of Colombia with the active support of Canada, India, and Jamaica, to come to these more elaborated proposed amendments to the GSLPF (CXS 1-1985, 2024 version) to address labelling of food products like chewing gum products when presented in multi-pack formats/containers and/or joint presentation formats/containers.</p> <p>We note that the proposed amending texts cover both the list of ingredients and the net content and drained weight sections</p> <p>ICGA is looking forward to the finalisation of these proposals by the CCFL49 for a possible adoption by CAC49 as of July 2026.</p>	ICGA
<p>Malaysia would like to thank Colombia for chairing the Electronic Working Group on the Provisions Relevant To Joint Presentation And Multipack Formats in the General Standard for the Labelling of Pre-Packaged Foods.</p> <p>Malaysia has no objection with the proposed draft amendments to General standard for the labelling of pre-packaged foods (CXS 1-1985) (sections 4.2.1, 4.3.4, 4.7.1, and 8.1.3.1 to include the provisions relevant to joint presentation and multipack formats in Appendix I</p> <p>Malaysia is of the view to remove the text in the square bracket. Section 8.1.3.1 already clearly indicated the mandatory labelling requirements for outer wrapper.</p>	Malaysia
<p>Le Maroc reconnaît l'importance d'établir des dispositions claires pour l'étiquetage des aliments en emballages groupés incluant une présentation commune. Il souligne la nécessité de définir précisément les termes clés et d'adapter les règles au contexte du commerce en ligne.</p> <p>Concernant les définitions, il est important de définir précisément les notions d'«emballage groupé» et de «présentation commune», en distinguant les cas où l'emballage extérieur est destiné au consommateur final de ceux réservés à la vente en gros. En outre, elle est également essentiel d'ajouter des exigences minimales de taille de caractères et de contraste pour les informations figurant sur les emballages groupés, eu égard aux contraintes d'espace d'étiquetage ainsi que d'inclure des dispositions spécifiques pour la vente de produits en emballages groupés via des plateformes numériques, précisant les informations devant être accessibles avant l'achat.</p>	Morocco
<p>Re note on inner packages:</p> <p>16. CCFL 49 is also requested to note that inner packages that are not intended for individual sale will not be considered within the scope of this work, and if these are sold individually, they must comply with all GSLPF requirements.</p>	New Zealand

<p>New Zealand comment:</p> <p>This has been New Zealand's understanding all along. New Zealand considers the unit being sold is the one to which the GSLPF requirements apply. In the case of foods sold in multipack and joint presentation formats that is the outer package.</p>	
<p>SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa supports retaining the text in square brackets under Section 8.1.3.1 as it provides clarification on the requirement to display any mandatory labelling information for the pre-packaged food sold as a single unit when it differs from that of the individual inner units. • This improves clarity, prevents ambiguity where key information such as name and address details differs between the outer packaging and inner units, and enables consistent and flexible implementation by competent authorities. 	South Africa
<p>We endorse the wording of the sections under consultation</p> <p>We agree to keep the text in square brackets under section 8.1.3.1 since if any mandatory information in any of the packs differs from the others, consumers must be able to access it on the outer</p>	EFAD
<p>The United Arab Emirates (UAE) would like to thank the Codex Alimentarius Commission Secretariat for Circular Letter CL 2026/08-FL regarding the proposed amendments to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985), specifically provisions related to foods sold in joint presentation and multipack formats. The UAE appreciates the efforts of the Electronic Working Group in developing the draft text and supports the overall objective of enhancing clarity and consistency in the application of labelling requirements for such products. In general, the UAE supports the progression of the proposed draft amendments to the next step, subject to the following comments</p>	United Arab Emirates
<p>The United States recognizes the hard work of the EWG, chaired by Colombia and co-chaired by Canada, India, and Jamaica. The United States participated in the EWG and believes that with productive discussion at CCFL49 this agenda item could be advanced to final adoption.</p>	USA
<p>No further comments</p>	Vanuatu
<p>Zambia supports the proposed draft amendments to Sections 4.2.1, 4.3.4, 4.7.1, and 8.1.3.1 of the GSLPF. Zambia recognizes the increasing importance of multipack formats and the need for clear, harmonized, and practical labelling provisions to enhance consumer protection, transparency, fair trade, and consistency across Codex standards. Zambia supports advancement of the draft to Step 5, subject to further refinement, with emphasis on clarity, practicality and avoidance of duplication.</p> <p>The proposed amendments are necessary to strengthen consumer protection, improve transparency, facilitate fair trade, and ensure consistent application of labelling requirements across jurisdictions.</p>	Zambia

SPECIFIC COMMENTS

COMMENT	MEMBER / OBSERVER
4.2 <i>List of Ingredient</i>	
<p>Australia supports this amendment and appreciates the effort of the EWG Chairs in balancing members' feedback to maintain the clarity of this provision.</p> <p>Australia supports the reference to section 8.1.3.1 in this provision, as it both identifies the circumstances in which 4.2.1 would apply (i.e. a container of pre-packaged food that is sold as a single unit and consists of more than one identical or different individually packaged foods, whether intended to be consumed together or separately) and recognises that in such circumstances, the label must also comply with other mandatory labelling requirements under sections 4 and 5 of the GSLPF (including allergen labelling requirements), as noted within section 8.1.3.1.</p>	Australia
<p>SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa supports proposed Section 4.2.1 (bis) as it clarifies how ingredient listing should be applied to multipack and joint presentation foods under Section 8.1.3.1, allowing either separate or combined ingredient lists depending on product use. • The provision enhances clarity, flexibility and harmonisation, while ensuring consumers receive clear and meaningful ingredient information to make informed choices 	South Africa
<p>Where a container comprises similar pre-packaged food items intended to be consumed together, the list of ingredients may be provided on the outer packaging in instances where the individual units are too small to accommodate such information or where legibility would be compromised. This provision ensures that consumers are still adequately informed while addressing practical packaging limitations. The same approach should apply to the declaration of net contents and drained weight, allowing this information to be presented on the outer container where it cannot be effectively displayed on the individual inner packages. This ensures consistency in labelling requirements while maintaining clarity, readability, and compliance with regulatory standards.</p>	Zambia
<p>New Zealand does not support the second part of the sentence in 4.2.1(bis) It is not needed . If the sentence ended at the coma (ie after the word 'declared'), this allows for either an ingredients list for each type of inner pack or a combined ingredients list for the total content of the unit sold (multipack or joint presentation). Which option is used is up to the food business.</p> <p>The second part of the sentence introduces the implication that this should be different depending on how the product is consumed and also the nature of the food without clarifying how these aspects would alter which option should be used. This makes the text more confusing.</p>	New Zealand
<p>Estamos de acuerdo con 8.1.3.1.</p>	Peru
<p>Canada supports the revised text. The intended way the food is consumed will indeed inform how the ingredients should be labelled. For example, a single combined ingredient list could make sense for foods sold in joint presentation that are intended to be consumed together, as the consumer would eat a combination of ingredients from the individual packages. However, a single combined ingredient list to represent all of the foods in a multipack of different types of granola bars would not make sense as it would not represent the ingredients a person would consume for one unit – in that case, separate lists of ingredients for each type would be appropriate. The new wording recognizes that what is appropriate for consumer understanding and informed purchasing decisions will depend on how the food sold in multipack or joint presentation is intended to be used or consumed, while maintaining flexibility for competent authorities.</p>	Canada
<p>ICGA notes that the text introduces new requirements to provide either separate lists of ingredients for each type of food, or a combined list of ingredients, as appropriate to the nature of the food and whether the foods are intended to be consumed separately or together.</p> <p>We assume this would provide for continued use of a combined list of ingredients for individually wrapped confectionery and fine bakery wares, sold in a container.</p>	ICGA

<p>ICGA is looking forward contributing more proactively to the upcoming discussions to be held during CCFL49 plenary meeting.</p>	
<p>On the proposed amendments to subsection 4.2.1 (list of ingredients)</p> <p>The EUMS do not entirely support the revised section 4.2.1. If there is a need to further clarify the GSLPF as to the indication of the ingredient list in the case of joint presentation and multipack formats, this should be done under section “8. Presentation of mandatory information” of the GSLPF since the overall aim is to clarify how mandatory food information should be given in the case of joint presentation and multipack formats and not to establish additional mandatory food information particulars for them.</p> <p>Therefore, the EUMS suggest introducing following additional subsection under section “8. Presentation of mandatory information” (ideally after sub-section 8.1.4 subsection) based on the new text proposed under section 4.2.1: “For pre-packaged foods subject to section 8.1.3.1, if the lists of ingredients of the individually packaged foods in a container of prepackaged food sold as a single unit are not readily legible through the outer packaging or obscured by it, either separate lists of ingredients for each type of individually packaged food that makes up the container, or a combined list of ingredients shall be declared on the outer packaging, as appropriate to the nature of the food and whether the individually packaged foods are intended to be consumed separately or together.”</p>	<p>European Union</p>
<p><u>(bis) For pre-packaged foods subject to section 8.1.3.1, either separate lists of ingredients for each type of individually packaged food that makes up the container, or a combined list of ingredients shall be declared, as appropriate to the nature of the food and whether the individually packaged foods are intended to be consumed separately or together. When the prepackaged food contains allergen or Precautionary Allergen Labelling applied, separate lists of ingredients and allergen statements, as applicable in accordance with Section 8.3, shall be declared on the label of the container of the prepackaged food, for each type of individually packaged food.</u></p> <p>Indonesia supports the new text with the additional statement, as follows: "When the prepackaged food contains allergen or Precautionary Allergen Labelling applied, separate lists of ingredients and allergen statements, as applicable in accordance with Section 8.3, shall be declared on the label of the container of the prepackaged food, for each type of individually packaged food."</p> <p>The additional statement would enable consumers who need to avoid certain allergens to make informed choices by selecting individually packaged foods that do not contain those allergens.</p>	<p>Indonesia</p>
<p>Thailand supports the proposed revision of clause 4.2.1bis as submitted by the working group, as the revised text provides greater clarity. Thailand also supports its placement as a new Clause 4.2.2.</p>	<p>Thailand</p>
<p>4.2.1(bis) In light of the diverse range of products in the domestic industry — including dual-format products (e.g. oil + capsules), meal kits, and multi-flavour assortment products — the Republic of Korea is of the view that it would be impractical to regulate the format of ingredient list labelling solely on the basis of whether components are consumed together or separately.</p> <p>The Republic of Korea therefore proposes that individual or consolidated ingredient labelling be applied flexibly in accordance with the characteristics of each product.</p>	<p>Republic of Korea</p>
<p><u>(bis)-a(bis) For pre-packaged foods subject to section 8.1.3.1, either a separate lists list of ingredients for each type of individually packaged food that makes up the container, or a combined list of ingredients shall be declared, as appropriate to the nature of the food and whether the individually packaged foods are intended to be consumed separately or together.</u></p> <p>AOECS suggests to only allow for a separate list of ingredients, i.e. delete ‘or a combined list of ingredients’. This informs people with a food allergy and/or coeliac disease who can choose to specifically discard the individually packed item they must avoid.</p>	<p>Association Of European Coeliac Societies Codex and Regulatory Affairs</p>
<p><u>(bis) For pre-packaged foods subject to section 8.1.3.1, either separate lists of ingredients for each type of individually packaged food that makes up the container, or a combined list of ingredients shall be declared, as appropriate to the nature of the</u></p>	<p>USA</p>

<p><u>food and regardless of whether the individually packaged foods are intended to be consumed separately or together.</u></p> <p>The United States can support section 4.2.1(bis) recognizing the need for flexibility as to how ingredient declarations are made with respect to the nature of the food(s) and how they are packaged in the container. We offer a slight edit to the text for clarity.</p>	
<p>For Section 4.2.1(b), ICBA appreciates the proposed new language that introduces more flexibility to include the ingredients either separately or as a single combined list(s) and agrees that allergen statements be removed from this statement and covered elsewhere.</p>	ICBA
<p>FoodDrinkEurope does not support this wording.</p> <p>Rationale: where there are individually packed items of a different nature in a multipack, consumers have the choice to exclude such item from consuming, e.g. for dietary or religious reasons. Then providing the list of ingredients per individually packed items will help such consumer in their choice. Therefore, we would propose to make the list of ingredients required for each type of prepacked item in the multipack, regardless the intended use. We suggest the following text:</p> <p>For prepackaged foods subject to section 8.1.3.1 containing different types of individually packaged foods, separate lists of ingredients and allergen statements, as applicable in accordance with Section 8.3, for each type of individually packaged food shall be declared on the label.</p>	FoodDrinkEurope
<p>4.3 Net contents and drained weight</p>	
<p>Australia supports this amendment as it provides flexibility for net contents to be declared either as a whole or in reference to the individual pre-packaged foods.</p>	Australia
<p>SA position and rationale:</p> <ul style="list-style-type: none"> - South Africa supports Section 4.3.4 as it allows flexible declaration of net contents for multipack and joint presentation foods, either as total contents or by unit quantity and size. - This approach improves clarity and transparency for consumers while maintaining practical flexibility for food industry and supporting harmonised labelling under CXS 1-1985 	Zambia
<p>New Zealand can agree to this.</p>	New Zealand
<p>We note that the GSLPF does not currently contain any provisions on declaration of the number of foods. Although we do not object to the proposed text (4.3.4), we request further clarity on the requirement to indicate such numbers, especially where the number of each type of food is equal to one (1).</p> <p>ICGA is looking forward contributing more proactively to the upcoming discussions to be held during CCFL49 plenary meeting.</p>	ICGA
<p>On the proposed amendments to subsection 4.3.4 (net content)</p> <p>The EUMS do not support the revised subsection 4.3.4 as the latter seems to create an additional obligation: the indication of the number of individually pre-packaged foods per type on the individually packaged foods that make up the container. Also, it is not clear whether “intended to be consumed separately” applies to the multipack/joint presentation or to the individually packaged foods in the multipack/joint presentation and, if applied to each individually packaged food, why the subsection applies only to multipack/joint presentation formats composed of individually packaged foods intended to be consumed separately.</p> <p>The EUMS consider furthermore that:</p> <ul style="list-style-type: none"> - if all the ingredient lists on the individually packaged foods are readily legible through the outer packaging and not obscured by it, there is no need to repeat these on the outer packaging, and - if there is a need to further clarify the GSLPF as to the indication of the net contents in the case of joint presentation and multipack formats, this should be done under section “8. Presentation of mandatory information” of the GSLPF since the overall aim is to clarify how mandatory food information should be given in the case of joint presentation 	European Union

<p>and multipack formats and not to establish additional mandatory food information particulars for them.</p> <p>The EUMS are therefore of the opinion that an additional sub-section under section “8. Presentation of mandatory information” of the GSLPF would be the most adequate way to proceed. This additional sub-section could be placed after sub-section 8.1.4 and be formulated as follows: “For pre-packaged foods subject to section 8.1.3.1, if the number of individually packaged foods in the container cannot be easily counted through the outer packaging, and/or if their net quantities per type are not readily legible through the outer packaging or obscured by it, either the number of individually packaged foods per type and their respective net contents or the total net content shall be indicated on the container of that prepackaged food.”</p>	
<p>Thailand supports the proposed revision of clause 4.3.4 as submitted by the working group, which allows flexibility in declaring the quantity either as a total amount (600 mL), as quantity per unit with the number of units (3 × 200 mL), or both formats combined (600 mL (3 units of 200 mL)). Furthermore, where the individual units are clearly countable and the quantity of each type is visible, the declaration of quantity on the outer packaging may be omitted.</p>	Thailand
<p>Indonesia supports the proposed wording of Section 4.3.4.</p>	Indonesia
<p>Regarding section 4.3.4, the United States does not object to the revisions made as a result of the EWG comments.</p>	USA
<p>Canada supports the revised draft wording for the net contents declaration, which allows total net contents, number of units × net contents per unit, or both. This proposal recognizes the unique nature of foods sold in multipacks regarding net quantity, while providing flexibility.</p>	Canada
<p>ICBA supports the new 4.3.4 text which provides flexibility on how net content is presented. We agree that net contents be indicated as total net content of a package and/or as individually pre-packaged foods per type and respective net contents of each unit. This is important for countries that do not require the inclusion of the “total net contents” on multipack labels, based on consumers’ preferences. For example, in the European Union, Japan, New Zealand, and many countries in the Africa region do not require the total net contents and simply state only the number of units and their respective individual net content on the outer package. Therefore, making the total net content optional would allow for flexibility based on known country-specific requirements. To avoid potential confusion, we also agree with not including examples.</p>	ICBA
<p>Brazil supports the revised text for Section 4.3.4, as it addresses a relevant gap regarding the declaration of net contents for foods sold as a single unit in multipack format.</p> <p>Brazil notes that the revised wording reflects the discussions held in the EWG and introduces a more flexible approach to the declaration of net contents for foods sold as a single unit in multipack formats.</p> <p>Brazil considers this flexibility positive, as it allows competent authorities to address the declaration of net contents for these products in a manner suited to their regulatory frameworks, while still ensuring that consumers receive clear and meaningful information.</p>	Brazil
<p>FoodDrinkEurope supports the new wording.</p> <p>Rationale: Some countries require the inclusion of the 'total net contents' on the multipack label while others do not. Therefore, it is important to maintain flexibility in country-specific applications.</p>	FoodDrinkEurope
<p>Section 4.2.1 List of Ingredients • The proposed text is useful, but it would benefit from clearer guidance. We suggest explaining when a separate ingredients list is required for each inner unit and when a combined list is acceptable. This will help avoid different interpretations among countries, especially when the inner units have different compositions or are meant to be consumed separately. • Clarification may be useful regarding claims. In multipacks, some inner units may carry specific claims (for example, “high fibre” or “gluten free”, while others may not. It would be helpful to clarify how such claims should be presented on the outer packaging to avoid misleading consumers. • It may also be useful to clarify how ingredient lists should be handled when inner units are intended to be redistributed individually after removal from the multipack.</p>	United Arab Emirates

Estamos de acuerdo.	Peru
4.7 Date marking and storage instructions	
<p>Australia supports the changes to this amendment to specify the types of date marking in section 4.7.1.</p> <p>Australia also supports the new text in the final sentence of this amendment to prioritise the declaration of safety-related date markings (use-by or expiration dates) on the container.</p>	Australia
<p>SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa supports Section 4.7.1 (vi) bis as it clarifies that the earliest relevant date across individual units in a multipack must be declared, with priority given to safety-related use-by or expiration dates. • This section enhances consumer protection, reduces potential confusion, and supports consistent and practical implementation in line with the GSLPF (CXS 1-1985) • We also noted that most EWG members were supportive of this provision. 	South Africa
<p>Zambia supports the application of relevant Codex standards with respect to date marking of pre-packaged foods, except in exceptional circumstances where deviations may be justified. However, the concurrent use of both “best-before date” and “best quality-before date” is not supported, as these terms convey essentially the same meaning relating to product quality rather than safety. The use of both terms may result in unnecessary duplication and has the potential to confuse consumers regarding their interpretation and significance. It is therefore recommended that only one quality-related date be retained for clarity and consistency, with a preference for the term “best-before date.” In addition, it is proposed that the “expiration date” be maintained as the sole safety-related date, as it provides a clear and definitive indication to consumers regarding the period beyond which the product should not be consumed. This approach would enhance consumer understanding, reduce ambiguity in labelling, and promote harmonisation with international best practices, while ensuring that date marking remains both practical for industry and informative for consumers.</p>	Zambia
<p>New Zealand suggests aligning this text with current date marking texts which require a use-by or expiration date be declared if a food must be consumed by a certain date to ensure its safety (or quality) and only if no use-by/expiration date is needed is the best before/best quality before date appropriate. We suggest the following text to achieve this:</p> <p>4.7.1(vi) bis For prepackaged foods subject to section 8.1.3.1 if a use-by date or expiration date applies to one or more of the types of individually packaged foods, the earliest use-by date should be declared on the single unit to be sold. Where a use-by date or expiration date is not required, the best-before date or best quality before date shall be declared as the earliest date of the individually packaged foods that make up the container (if they differ).</p>	New Zealand
<p>Regarding section 4.7.1, the United States supports the edits to replace “date marking” with the type of date, e.g. best-before-date, use-by date, expiration date and have no objections to replacing the word “visible” with “clearly discernible and legible.”</p> <p>If the committee agrees to keep the new text, we would propose some minor wording changes to improve clarity:</p> <p>"If the inner units have more than one type of date, both the earliest date overall and the earliest use-by or expiration date shall be listed— unless the use-by or expiration date is already the earliest date overall."</p>	USA
<p>Canada supports the proposed date-marking provision that requires the earliest date of the dates of the inner units to be the one that is declared. This clarifies for consumers the best before date of the package overall. Canada also supports requiring the earliest safety date (use-by/expiration) to always be provided when multiple date types exist because consumers use expiration dates differently than best before dates. Consumers may choose to still consume a food after the “best before” date has passed but for safety reasons, would not do so after the expiration date has passed.</p>	Canada
<p>Brazil supports the revised text for Section 4.7.1 as the proposed wording provides a clearer and more consistent approach to date marking for foods sold as a single unit in joint</p>	Brazil

<p>presentation and multipack formats, particularly in situations where the individually packaged foods bear different dates.</p> <p>Brazil also considers that the revised text appropriately addresses concerns related to legibility and to cases where different types of date marking may appear on the individually packaged foods, including situations involving both quality-related dates and safety-related dates.</p> <p>In Brazil's view, the proposed provision contributes to consumer protection and informed choice by ensuring that the most relevant date marking information applicable to the product sold as a single unit is clearly provided.</p>	
<p>On the proposed amendments to subsection 4.7.1 (date marking)</p> <p>The EUMS do not support the revised section 4.7.1 as it creates additional mandatory information particulars for containers of prepackaged foods sold as a single unit and consisting of individually packaged foods. The EUMS consider indeed that:</p> <ul style="list-style-type: none"> • if there is a need to further clarify the GSLPF as to date marking in the case of joint presentation and multipack formats, this should be done under section "8. Presentation of mandatory information" of the GSLPF since the overall aim is to clarify how mandatory food information should be given in the case of joint presentation and multipack formats and not to establish additional mandatory food information particulars for them; • if the use-by/best before dates, in particular the earliest one, are readily legible through the outer packaging and not obscured by it, there is no need to repeat these on the outer packaging. <p>The EUMS therefore suggest introducing following an additional sub-section based on the proposed text for section 4.7.1(vi)bis under "8. Presentation of mandatory information" (ideally after subsection 8.1.4):</p> <p>"For pre-packaged foods that are subject to section 8.1.3.1, the manner to provide date marking is either to ensure at least the earliest date marking is readily legible through the outer packaging and not obscured by it, or to indicate the date of the individually packaged food with the earliest date marking on the outer packaging."</p>	<p>European Union</p>
<p>Indonesia generally supports the approach that, in cases where there are differences in the type of date marking, the earliest expiration date should be indicated, taking into account food safety considerations. However, Indonesia would like to note that the current proposed wording of Section 4.7.1 needs further clarification to improve clarity, and it would be better to be complemented with examples to support practical implementation.</p>	<p>Indonesia</p>
<p>Thailand supports the proposed revision of clause 4.7.1 (vi) bis as submitted by the working group. Thailand, however, proposes a minor amendment to ensure consistency with the date marking provision under clause 4.7.1 (ii), using capital letter of date marking terms and inserting "Best-before or Best quality before" to improve clarity.</p>	<p>Thailand</p>

<ul style="list-style-type: none"> • For clarity and consistency, it suggested that the total net contents of the outer package be declared, and where relevant, the number of units per type and their respective net contents should also be indicated. • However, the use of “and/or” may lead to inconsistent application. It would be helpful to specify the situations in which the total net contents must be declared, and when the number and net contents of each inner unit should be listed. Clarifying what is meant by “easily counted” with simple examples would also improve understanding. <p>Section 4.7.1 (vi) bis The UAE supports the requirement to declare the earliest applicable date among the individually packaged foods, including the earliest use-by or expiration date, as a key measure to ensure consumer protection. To further strengthen clarity and avoid potential misinterpretation, particularly in relation to food safety, the UAE recommends providing more explicit guidance on: (i) The handling of multiple types of date markings (e.g. best-before and use-by dates) within the same multipack. (ii) The application of the requirement when the multipack contains products from different production batches; and (iii) The obligations for updating date marking where the composition or configuration of the multipack changes. In addition, consideration should be given to simplifying and clarifying the wording of the provision to ensure it is easily understood and consistently applied.</p>	United Arab Emirates
<p>Se considera que las propuestas de enmienda a las secciones 4.2.1, 4.3.4 y 8.1.3.1 son adecuadas. No obstante, la redacción de la enmienda sugerida a la sección 4.7.1 resulta ser un poco redundante y, en cierto grado, confusa. Se sugiere retomar la redacción de la segunda consulta del GTE, con unos ajustes editoriales e incluyendo una nota de pie de página donde se aclaren los tipos de marcados de fecha.</p> <p>4.7.1 (vi) bis: Para los alimentos preenvasados sujetos a la sección 8.1.3.1, la forma de proporcionar el marcado de fecha¹ es declarar en el envase exterior la fecha del alimento envasado individualmente con el marcado de fecha más temprano. Si las unidades internas tienen más de un tipo de marcado de fecha, se debe declarar la más temprana de los alimentos que se enmarquen en la sección 4.7.1 (i).</p> <p>marcado de fecha: fecha de consumo preferente antes de, fecha de mejor calidad antes de, fecha límite de utilización o fecha de caducidad/fecha de vencimiento.</p>	Colombia
<p><u>4.7.1 (vi) bis: For pre-packaged foods subject to section 8.1.3.1, the best-before date, best quality-before date, use-by date, or expiration date shall be declared as the earliest date of the individually packaged foods that make up the container (if they differ), If the inner units have more than one type of date, both the earliest date overall and the earliest use-by or expiration date shall be listed— unless the use-by or expiration date is already the earliest overall.</u></p> <p>The United States suggests these minor wording changes to improve clarity.</p>	USA
<p><u>4.7.1 (vi) bis: For pre-packaged foods subject to section 8.1.3.1, the best-before date, best quality-before date, use-by date, or expiration date shall be declared <u>clearly discernibly and legibly</u> as the earliest date of the individually packaged foods that make up the container (if they differ), If the inner units have more than one type of date, the earliest date and the earliest use-by or expiration date shall be listed— unless the use-by or expiration date is already the earliest.</u></p> <p>ICBA agrees with the new language which specifies the types of date markings which would apply. In the “Proposed Path Forward” the EWG suggested that “to address the comments about legibility, the word “visible” is replaced by “clearly discernible and legible.” However, this language is not included in the revised version. Therefore, ICBA has proposed the edited language be added.</p>	ICBA
<p>Brazil supports the proposed new text in Section 4.2.1 (bis) as the revised wording provides an appropriate and flexible approach to the declaration of ingredient lists for foods sold as a single unit in joint presentation and multipack formats, taking into account the nature of the food and whether the individually packaged foods are intended to be consumed separately or together.</p> <p>In Brazil's view, the revised text improves clarity while allowing competent authorities sufficient flexibility to address different product presentations in their regulatory frameworks.</p>	Brazil
<p>The benefit of the additional text is unclear. The earliest date is providing the general durability information for the multipack. Where consumers like to split the multipack and store</p>	FoodDrinkEurope

the individual items, the type of durability of that item will be clear. We don't support the - complex - addition.	
<p>4.7.1 (vi) bis: Para los alimentos preenvasados sujetos a la Sección 8.1.3.1, <u>la fecha el marcado de consumo preferente antes de, la fecha de mejor calidad antes de, fecha límite de utilización o fecha de caducidad/fecha de vencimiento, que se debe declarar declare en el envase exterior deberá corresponder a la fecha más temprana de los alimentos envasados individualmente que componen el envase (si difieren) cuando estas difieran. Si las unidades internas tienen más de un tipo de fecha, se debe indicar la fecha más temprana y la fecha de caducidad o vencimiento más temprana, a menos que la fecha de caducidad o vencimiento ya sea la más temprana.</u></p> <p>Esta disposición podría simplificarse para centrarse en el principio de declarar la fecha más temprana. La enumeración de los distintos tipos de marcado de fecha (por ejemplo, fecha de consumo preferente, fecha de caducidad, entre otros) no es necesaria en este contexto, ya que estos conceptos están claramente definidos en la NGEAP. Su inclusión genera redundancia y podría afectar la claridad del texto. Por lo anterior se propone la siguiente redacción.</p>	Costa Rica
Estamos de acuerdo.	Peru
8. PRESENTATION OF MANDATORY INFORMATION	
Australia supports these amendments, including the change from 'will' to 'shall' for consistency with other Codex texts, and the removal of the reference to 'transparent' outer packaging in favour of ensuring that if outer packaging is used, the mandatory labelling inside that outer packaging is legible and discernible, as this better conveys the intent of this section.	Australia
Zambia supports the proposed labelling requirements as they promote transparency and traceability within the food supply chain. However, we recommend that the inclusion of the importer's details should not be made mandatory in all cases. Manufacturers often distribute products across multiple international markets, and it may not be feasible or practical to designate a specific importer on the label at the point of production. This requirement could create logistical challenges, particularly where products are exported to various destinations through different distributors. The inclusion of importer information should therefore be required only in circumstances where the product is specifically manufactured, packaged, or labelled for a particular importer or market. In such cases, identifying the importer would enhance accountability and consumer protection.	Zambia
New Zealand is supportive of the addition of the words "for that container" in section 8.1.3.1 and believe that as a consequence, the text in square brackets is not necessary	New Zealand
<p>Comments: We support sections 8.1.3.1 and 8.1.3.1(a), as they improve operational efficiency by consolidating essential labeling information for multi-unit packaging formats. This not only ensures consumers receive mandatory details but also streamlines processes by reducing unnecessary duplication.</p> <p>While we have so specific objection to the square brackets that pertains to 8.1.3.1 (a) we believe that it could benefit from editorial changes: the language is "clunky".</p> <p>Should this text be retained, we suggest that Codex Standards show examples in footnote, not in main body text.</p> <p>We offer the following:</p> <p>"When mandatory labelling information of individual prepackaged food is legible through the transparent outer packaging of the multipack and is not applicable to the multipack unit as sold, the outer packaging must provide this information in a clear and unambiguous manner."</p>	ICGMA
<p>Confirmer que toutes les informations obligatoires (liste des ingrédients, allergènes, date limite de consommation) doivent figurer sur l'emballage extérieur lorsque celui-ci est le point de vente au consommateur final</p> <p>Justificatif :</p> <p>La protection du consommateur exige qu'il puisse accéder à toutes les informations essentielles sans avoir à débiller le produit.</p>	Morocco
Estamos de acuerdo.	Peru

The EUMS agree on the proposed formulation of subsection 8.1.3.1.	European Union
Section 8.1.3.1 • The UAE notes that while the concepts of “multipack” and “joint presentation” are described within the draft provisions, they are not formally defined. In practice, “multipack” generally refers to pre-packaged foods sold as a single unit consisting of multiple individually packaged items, typically of the same or similar type and intended to be consumed separately. In contrast, “joint presentation” refers to pre-packaged foods sold as a single unit consisting of different individually packaged components intended to be combined or consumed together. While the UAE recognizes the approach taken to avoid introducing new definitions, the absence of clear definitions may lead to differing interpretations among Members, particularly in borderline cases. The UAE therefore considers that additional clarification or explanatory guidance may be beneficial to support consistent and harmonized implementation.	United Arab Emirates
<p>Se considera que el texto entre corchetes de la sección 8.1.3.1 es innecesario. Este texto podría inducir confusión más que proporcionar claridad sobre el tema abordado.</p> <p>En caso de mantener el texto propuesto, se propone ajustar de la siguiente manera:</p> <p>Cualquier información obligatoria de etiquetado para los alimentos preenvasados que se venden como una sola unidad y que sea diferente a la de los alimentos envasados individualmente que forma el envase, debe aparecer en el embalaje exterior de acuerdo con lo dispuesto en la legislación nacional interna.</p> <p>Estamos de acuerdo con que el trabajo avance al próximo paso.</p>	Colombia
Costa Rica considera que el texto entre corchetes en la Sección 8.1.3.1 no es necesario, no obstante, no se opone a su inclusión si el Comité así lo prefiere. En este caso, se propone un ajuste para simplificar el texto.	Costa Rica
Thailand supports the proposed revision of clause 8.1.3.1 as submitted by the working group.	Thailand
Indonesia considers that the proposed wording of Section 8.1.3.1 could benefit from further refinement to improve clarity. However, Indonesia is of the view that the text in square brackets under section 8.1.3.1 is needed.	Indonesia
The United States can support the proposed amendments to section 8 and agrees that no further amendments to the definitions section of the GSLPF are necessary as the revised section 8 sufficiently guides the application of mandatory labelling to multipacks and joint presentation, including the labelling of food allergens.	USA
Canada supports the proposed draft subsection (8.1.3.1) which outlines how mandatory labelling applies to multipacks and joint-presentation foods in general. The provision ensures that mandatory information applicable to the package is either displayed on the outer package, or legible and discernible on at least one of each type of inner package. Canada agrees that it is not necessary to state that the outer packaging must be transparent and that “readily legible and discernible” is sufficient.	Canada
<p>Brazil welcomes the revisions made to the chapeau of Section 8.1.3.1, including the replacement of “will” by “shall”, the removal of the requirement for transparent outer wrapping, and the clarification that the mandatory labelling information to be provided is the information applicable “for that container”.</p> <p>However, Brazil considers that these improvements do not fully remove the need for an express clarification on how to address situations where the mandatory labelling information shown on the individually packaged foods differs from the mandatory labelling information applicable to the pre-packaged food sold as a single unit.</p> <p>Retaining such clarification would improve legal certainty, support consistent interpretation, and make clear that only the differing information needs to appear on the outer packaging.</p> <p>Brazil proposes the following simplified wording for Section 8.1.3.1(a), in order to make the provision more objective and concise without changing its substance:</p> <p>Proposed wording for Section 8.1.3.1(a):</p> <p>[Any mandatory labelling information applicable to the pre-packaged food sold as a single unit that differs from the information shown on the individually packaged foods that make up the container must appear on the outer packaging.]</p>	Brazil

<p>FoodDrinkEurope would like to reiterate that the existing Section 8.1.3 of the GSLPF (CXS 1-1985) sufficiently covers the placement requirements of the mandatory labelling elements.</p> <p>However, should there be consensus amongst Codex members to include such addition, FoodDrinkEurope suggests to amend the text as follows:</p> <p>“When mandatory labelling information of the individually packaged foods which is legible through the transparent outer packaging is not applicable to the unit as sold, then the outer packaging must provide this information in a clear and unambiguous manner.”</p> <p>Furthermore we think that Codex Standards should have any examples in footnotes, not in the main text.</p>	FoodDrinkEurope
<p><u>[a. Cualquier información obligatoria de etiquetado para los alimentos preenvasados que se venden como una sola unidad y que sea diferente a la de los alimentos envasados individualmente que forman el envase, debe aparecer en el embalaje exterior. exterior (por ejemplo: Cuando, cuando el nombre y la dirección requeridos por la Sección 4.4 para el alimento preenvasado vendido como una sola unidad difieren de los de las unidades interiores preenvasadas individualmente, el nombre y la dirección del empaquetador, distribuidor, importador, exportador o vendedor de la unidad individual aparecerán en el embalaje exterior transparente individualmente).]</u></p> <p>Se elimina redundancia.</p>	Costa Rica
<p>El texto entre corchetes no es necesario, dado que introduce un nivel de detalle que no es consistente con el enfoque de alto nivel de la norma. Es confuso.</p>	Peru
<p>The EUMS are however not in favour of the provision in square brackets under section 8.1.3.1 since most of the mandatory labelling information for a pre-packaged food sold as a single unit consisting of several individually packaged foods is per se different to that for each individually packaged food (e.g. overall and individual net contents respectively or, in the case of a multipack or joint presentation consisting of several different individually packaged foods, overall or individual ingredient lists respectively). The proposed text would therefore lead to the indication of an overall net content or an overall ingredient list on the outer packaging, amongst others. To the EUMS, this provision should be limited to the case where the packer of the joint presentation or the multipack format is different from the manufacturer(s), packer(s), distributor(s), importer(s), exporter(s) or vendor(s) indicated on the individually packaged foods contained in that joint presentation or the multipack format and be formulated as follows: “Where the packer of the prepackaged food sold as a single unit and consisting of more than one identical or different individually packaged foods is different from the manufacturer(s), packer(s), distributor(s), importer(s), exporter(s) or vendor(s) indicated on the individually packaged foods it contains, the name and address of that packer shall be indicated on the outer packaging.”</p>	European Union
<p>Thailand views that the current wording in Clause 8.1.3.1 is sufficiently clear; therefore, it is proposed that paragraph (a) may be deleted.</p>	Thailand
<p>Canada supports removing the text in brackets in paragraph (a) of 8.1.3.1, as the main chapeau sufficiently captures the obligation that mandatory information specific to the outer unit must be provided. While paragraph (a) is consistent with the intent of the rest of section 8.1.3.1, Canada believes that keeping it would be unnecessary.</p>	Canada
<p><u>[a. Any mandatory labelling information for the pre-packaged food that is sold as a single unit that is different to that on the individually packaged foods that make up the container must appear on the outer packaging. (e.g: Where the name and address required by Section 4.4 for the pre-packaged food sold as a single unit is different from that on the individually pre-packaged inner units, the name and address of the packer, distributor, importer, exporter or vendor of the single unit shall appear on the outer packaging.)]</u></p> <p>ICBA supports including the bracketed information in the revised section 8.1.3.1 with the suggested edit as this is more concise and clearer in intent.</p>	ICBA

<p>We support sections 8.1.3.1 and 8.1.3.1(a), as they improve operational efficiency by consolidating essential labeling information for multi-unit packaging formats. This not only ensures consumers receive mandatory details but also streamlines processes by reducing unnecessary duplication.</p> <p>While we have so specific objection to the square brackets that pertains to 8.1.3.1 (a) we believe that it could benefit from editorial changes: the language is “clunky”.</p> <p>Should this text be retained, we suggest that Codex Standards show examples in footnote, not in main body text.</p> <p>We offer the following:</p> <p>“When mandatory labelling information of individual prepackaged food is legible through the transparent outer packaging of the multipack and is not applicable to the multipack unit as sold, the outer packaging must provide this information in a clear and unambiguous manner.”</p>	IGMA
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