

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 4.13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS OF INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN)

Agenda item 4.13 Codex Committee on Food Labelling

Discussion paper on New work proposal on application of food labelling provisions in emergencies RepFL48 paragraph 180, Annex I of CX/CAC 24/47/15

IBFAN made comments about this proposal during FL47 and FL48 and submitted a CRD (FL48/CRD28). We believe it has the potential to undermine decades of Codex work to ensure honest and safe labelling, and it should be returned to CCFL for reconsideration.

The proposal contains minimal safeguards to prevent its misuse in draft form. The inclusion of text requiring that exemptions should not be allowed to unilaterally bypass mandatory labelling requirements provides some limited safeguard. However, this could only be effective where strong labelling laws and active monitoring systems are in place. Elsewhere, the proposal will place populations experiencing emergencies, food insecurity or food deprivation at risk from political and commercial exploitation and donations that fail to provide safe labelling.

IBFAN has documented the risks to child health associated with the commercial exploitation of emergencies since the early 1980s and how food aid can be used to open up markets for inappropriate products.

In emergencies, child deaths can be two to 70 times higher than the average rate. For pregnant and lactating women and children from birth to 23 months, nutrition is key to reducing death and illness that accompany emergencies of all kinds. For the health of infants and young children it is critical that donations are appropriate and do not undermine breastfeeding. IBFAN proposes the following:

- Populations experiencing food insecurity and food deprivation should not be treated as requiring lower standards of labelling about ingredients, nutrient content, safe preparation, storage and handling than the standards required for all populations
- The labelling of Food aid provided in emergencies must be accurate and must fully inform the recipient of the ingredients, the nutrient content and the safe preparation, storage and handling.
- The labelling of foods provided as aid must be in the local languages of those receiving the aid
- To ensure that breastfeeding is protected and prevent the misuse of any proposal while it is in draft, there must be clear References to Article 4 of the *Code of Ethics for International Trade in Food including Concessional and Food Aid, Transactions (CXC 20-1979)* that states: “National authorities should be aware of their obligations under the *International Health Regulations (2005)* with regard to food safety events, including notification, reporting or verification of events to the World Health Organisation (WHO). They should also make sure that the international code of marketing of breast milk substitutes and relevant resolutions of the World Health Assembly (WHA) setting forth principles for the protection and promotion of breast feeding be observed” The draft should also refer to the *Operational Guidance on Infant Feeding in Emergencies (OG-IFE)* version 3.0 (Oct 2017).

Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce. Guidelines on the use of technology to provide food information in food labelling

IBFAN considers that the debate on this item at CCFL was not sufficient. IBFAN for extra safeguards to protect privacy, prevent the harvesting of personal data and ensure that digital labelling does not lead purchasers to inappropriate material. Marketing via all manner of technology is fast becoming the predominant source of exposure to promotion of baby feeding products globally. In 2022, WHO's [report on digital marketing of breast-](#)

[milk substitutes](#) described its cross border extent and power, detailing how parents and carers are targeted by paid 'influencers' and other deceptive schemes with information that undermines WHO and national health recommendations and disempowers parents. *We are calling for this guideline to be reconsidered.*