

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 9

FL/43 CRD/20  
ORIGINAL LANGUAGE ONLY

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON FOOD LABELLING**  
**Forty-third Session**  
**Ottawa, Ontario, Canada, 9 – 13 May 2016**  
**(Project document from Costa Rica and New Zealand)**

## **PROPOSAL FOR NEW WORK ON FRONT OF PACK NUTRITION LABELLING**

### **1. PURPOSE AND SCOPE OF THE NEW WORK**

The scope of this new work is to consider the role for Codex in providing guidance on Front-of-Pack (FOP) nutrition labeling to governments and industry with the aim of maximizing harmonization and reducing barriers to trade. Globally there are a number of different forms of simplified nutrition information used on front of pack. This proposal seeks to review whether the current provisions under the *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* Section 5 Supplementary Nutrition Information:

- a) Would allow for the use of simplified nutrition information on the front of pack;
- b) Provides sufficient guidance on the use of simplified nutrition information on pack.

### **2. RELEVANCE AND TIMELINESS**

Simplified nutrition information (particularly on front of pack) has been identified as a significant opportunity in a number of countries.

For some years, innovative regulations that aim at supporting the consumer understanding more graphically, in addition to nutrition information on prepackaged products offered in the market, have been increasing. Additionally, there are some documents and actions that justify and support the establishment by governments, of this type of labeling as a means to help reduce the incidence of obesity and non-communicable diseases that is being faced worldwide.

In 2014, the FAO/WHO Coordinating Committee for Latin America and the Caribbean, via the Delegation of Costa Rica, “expressed its concern given the appearance of new forms for presenting nutritional information (e.g. front-of-pack labelling), which provided for different labelling depending on the final market and which aimed at making the information easier to understand to consumers to help them make informed decisions on issues such as non-communicable diseases, overweight and obesity”. The Delegation was of the opinion that this created problems for exporting countries and harmonisation of these approaches should be sought through the Committee on Food Labelling (CCFL) which had already harmonised the nutritional information to be provided.” The Codex Secretariat noted that no new work had been proposed yet to CCFL to justify new work. Costa Rica thus invited other countries to work together to develop a proposal for new work to submit for consideration by CCFL. The concerns of Costa Rica were shared by the delegations of Ecuador, El Salvador, and Peru.<sup>1</sup>

At the 37th Session of the Codex Committee on Nutrition and Foods for Special Dietary Foods, (2015), the Representative of WHO highlighted some of the activities of relevance to the on-going work of CCFNSDU. This included notation of a December 2015 WHO Technical Meeting on Nutrition

---

<sup>1</sup> Report of the 19th Session of the FAO-WHO Coordinating Committee for Latin America and the Caribbean, San Jose, Costa Rica, 10-14 November 2014; paras 142-145.

Labelling for Promoting Healthy Diets, Lisbon, Portugal.<sup>2</sup> The scope for this meeting notes the following in support of new work on this topic by CCFL:

*The Codex Guidelines on Nutrition Labelling (CAC/GL 2 – 1985), which was most recently revised by the Codex Alimentarius Commission in July 2015, provide detailed guidance on how to implement nutrition labelling, particularly related to nutrient declarations. These guidelines have been going through a series of updates and revisions during the last 10 years in response to the WHO Global Strategy on Diet, Physical Activity and Health adopted by the 57th World Health Assembly in May 2004. Among other revisions, the guidelines had expanded the list of mandatory nutrients to be declared (including fat, saturated fat, sodium and total sugars), and had established nutrient reference values (NRVs) for NCDs, such as saturated fat, sodium and potassium, in accordance with the WHO guidelines which are developed based on extensive evidence reviews.*

*Section 5 of the Codex Guidelines on Nutrition Labelling (CAC/GL 2 – 1985) provides guidance on “Supplementary nutrition information” or “front-of-pack” labelling. Unfortunately this section of the Codex Guidelines has not been reviewed nor updated in the light of various evidence and recommendations that are now becoming available. Thus countries are requesting WHO to provide guidance on how to move forward in implementing front-of-pack labelling in order to promote healthy diet as part various commitments made by the World Health Assembly as well as by the global intergovernmental meetings, such as ICN2 [Second International Congress on Nutrition].*

Proceedings of this WHO technical meeting are not yet available.

### 3. MAIN ASPECTS TO BE COVERED

The main aspects to be covered in the proposed new work include:

- Stocktake of the current front of pack nutrition labelling;
- Review the Guidelines on Nutrition Labelling (CAC/GL 2-1985) Section 5 Supplementary Nutrition Information for adequacy to guide use of front of pack nutrition labelling;
- Consider the need for global principles to underpin front of pack nutrition labelling.

### 4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES

#### Criteria

##### General criterion

Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.

Consumer protection – Simplified nutrition information may have a role to play in facilitating greater understanding of the nutrition content of foods by consumers. This may also help guide consumers to healthier choices. Simplified nutrition information, particularly on front of pack, may also encourage food manufacturers to reformulate their food products to gain a more positive nutrient profile, thus improving the nutritional quality of the food supply available to consumers. Improved nutrition via either a healthier food supply or consciously made healthier choices would improve the risk profile for a number of non-communicable diseases globally.

The Codex Guidelines on Nutrition Labeling (CAC/GL 2-1985) includes provision of “Supplementary Nutrition Information” (Section 5) that could benefit from expansion to cover additional guidelines and guiding principles on front of nutrition labelling.

##### Criteria applicable to general subjects

(a) *Diversification of national legislations and apparent resultant or potential impediments to international trade*

<sup>2</sup> Report of the 37th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses, Bad Soden am Taunus, Germany, 23-27 November 2015; Matters of Interest Arising from FAO and WHO; para 14.

Mandatory simplified front of pack nutrition information is being considered by some countries and a number of countries now have voluntary schemes in place. It is important that with a growing number of systems globally some consistency is maintained at a global level to ensure impediments to trade and WTO Technical Barriers to Trade challenges are minimised.

(b) *Scope of work and establishment of priorities between the various sections of the work.*

It is proposed that a review of section 5 of the *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* is undertaken to ensure that it enables the provision of simplified front of pack nutrition labelling. This is seen as the first priority. A second priority would be to produce guidance on the use of simplified nutrition labelling on front of pack if this was seen to be of value.

(c) *Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies)*

WHO held a Technical meeting on Nutrition Labelling for Promoting Healthy Diets in Lisbon, Portugal in December 2015. Prompted by a number of global and international commitments made, including those by the World Health Assembly which proposed nutrition labelling, in particular front-of-pack labelling as policy options for the prevention of obesity and diet-related noncommunicable diseases during the last several years, this meeting was held to review the available evidence and compile various country experiences and lessons learned with a view to develop guiding principles and guidance framework for implementing “front-of-pack” labelling. The background evidence review paper prepared for the meeting and meeting report as well as a guidance framework manual can be used by CCFL in progressing work on front of pack nutrition labelling.

(d) *Amenability of the subject of the proposal to standardization*

Many countries are looking to Codex for clear and unambiguous guidance on areas such as nutrition labelling. The purpose of the new work proposal is the review and clarification of existing text to ensure it provides for the use of simplified nutrition labelling on the front of pack and the development of guidance to support its use if required.

(e) *Consideration of the global magnitude of the problem or issue*

Front of pack nutrition information is a topic of interest in a number of countries around the World. Voluntary systems are in place in a number of countries and at a global level this is a topic of discussion at the WHO. Guiding consumers to healthier food choices and encouraging manufacturers to improve the healthiness of the food supply are areas where strong guidance could have a significant impact globally.

## 5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES

The proposed work is in line with the Commission’s mandate for the development of international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The new work proposal will contribute to advancing Strategic Goals 1 and 3 as described below.

***Strategic Goal 1: Establish international food standards that address current and emerging food issues***

The use of simplified nutrition labelling on the front of is of increasing interest and activity in a number of countries globally. Currently there is no global guidance on best practice with regard to this form of labelling. Therefore there is a risk that a proliferation of systems may result in confusion. Ensuring that the drafting of *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* Section 5 Supplementary Nutrition Information allows for the use of simplified nutrition information (such as that being used by countries on the front of pack) would help ensure a degree of global harmonisation. If it was considered that further guidance was required Principles for the use of such information this may further aid global harmonisation.

***Strategic Goal 3: Facilitate the effective participation of all Codex members***

Bringing this topic to CCFL will enable the participation of all members who have an interest in simplified nutrition labelling to participate in discussions.

## 6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS

The *Guidelines on Nutrition Labelling (CAC/GL 2-1985)* proposed for review are applicable horizontally across all prepackaged foods. Therefore section 5 that is proposed for review would apply across all prepackaged foods.

The proposed work will make reference to relevant standards and related texts, in particular the following, as applicable:

- General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985)
- General Guidelines for Claims (CAC/GL 1-1979)
- Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)
- Other relevant standards or guidelines identified by the electronic working group

## 7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE

None identified at this stage. There will be opportunity to consult with relevant bodies if necessary throughout the process.

## 8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES

Proceedings and papers from the December 2015 WHO Technical Meeting on Nutrition Labelling for Promoting Healthy Diets, Lisbon, Portugal would be a good starting point for this work. There will be opportunity to consult with relevant bodies if necessary throughout the process.

## 9. Proposed Timeline:

May 2016	Endorsement of new work proposal by CCFL
July 2016	Approval of new work by CAC
July 2016	Establishment of electronic working group to develop draft discussion document including stocktake of front of pack nutrition labelling systems and draft revised standard (if required)
May/Oct 2017	Consideration of discussion document and draft revised standard (if necessary to revise) at step 2 by CCFL and advancement to step 3 Consideration of draft revised standard and further work with technical experts by CCFL and eWG Consideration of draft standard by CCFL and advancement to step 5/8 CAC adoption of draft standard at step 5/8