

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 6

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD LABELLING

Forty-sixth Session

Virtual

27 September - October 1 and 7, 2021

### PROPOSED DRAFT GUIDELINES FRONT-OF-PACK NUTRITION LABELLING

Comments from ISDI

#### Agenda Item 6

Following the working group (WG) on front of pack nutrition labelling (FOPNL), held on 21-22 September and in line with the comments expressed by ISDI at the WG, we would like to propose the following amendment to the text of the scope, section 2.2:

*Foods covered by the following Codex standards are excluded:*

- *Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CXS 72-1981),*
- *Standard for Follow-up formula (CXS 156-1987),*
- *Standard for Labelling of and Claims for Foods for Special Medical Purposes (CXS 180-1991),*
- **Standard for Canned Baby Foods (CXS 73-1981),**
- **Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981),**
- **Standard for Formula Foods for Use in Weight Control Diets (CXS 181-1991).**

*In addition, other foods may be considered for exclusion at a national level dependent on the type of FOPNL being developed, such as alcoholic beverages and other foods for special dietary uses. FOPNL should not be used to promote the consumption of alcohol.*

#### Rationale for exclusion of additional Standards

ISDI has major concerns regarding the approach proposed during the WG on FOPNL concerning FSDU. ISDI understands that:

- some FSDU (e.g. gluten Free food) should not be excluded,
- other FSDU exclusions (e.g. sports food) should be decided at the national level as a specific Codex Standard does not standardize these products per se.

However, the approach decided at the WG does not recognize the specific situation of standardized products such as processed cereal based foods for infants and young children, canned baby foods and formula for use in weight control diets which the WG decided not to exclude from FOPNL.

ISDI would also like to recall that the scope of this work is FOPNL for use on foods for the general adult and

healthy population.

Harmonization and facilitating international trade are key purposes of Codex and ISDI believes that this approach of CCFL will miss the opportunity to provide complete, clear and harmonized worldwide guidance. The implementation of the scope, section 2.2, could lead to a patchwork of diverging national and regional FOPNL approaches for products that are standardized and formulated for the population with special dietary needs including products for infants and young children.

ISDI notes FOPNL is designed for use on foods for the healthy adult population and for foods targeting this population that does not have strict composition requirements. Therefore, ISDI reemphasizes that the nutritional compositional requirements of FSDU are tailored to meet the particular nutritional needs of the targeted group and purpose and are based on science including the dietary recommendations of recognised authoritative scientific bodies (e.g. energy contribution from macronutrients, the contribution of micronutrients to recommended daily intake, etc.). These products are standardized by concrete Codex texts and by CCNFSDU and must follow stricter food composition and safety requirements in comparison with foods for the general population. Applying FOPNL schemes and nutrient profiles developed for the adult healthy population on these products would mislead consumers and prevent them from making informed choices adapted to their nutritional needs. It would unjustifiably discriminate against these categories and undermine the purpose of the products.

ISDI considers that this is also in line with the recommendation from WHO in the scope section of "[WHO Guiding principles and framework manual for front-of-pack labelling for promoting healthy diet](#)" where the rationale for excluding standardized foods for infants and young children is that they have "*strict compositional criteria; hence, promoting reformulated products is not appropriate*".