

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Items 3, 4.1, 4.3, 4.4, 4.13, 12, 13**

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

#### Forty-seventh Session

Geneva, Switzerland, CIGG

25-30 November 2024

### COMMENTS OF ZAMBIA

#### Agenda Item 3: Amendments to the Procedural Manual (CX/CAC 24/47/2)

##### Background:

The 29th edition of the Procedural Manual was issued in E **Background:**

The 29th edition of the Procedural Manual was issued in English, and translations into Arabic, Chinese, French, Russian and Spanish are ongoing. The 29th edition reflects, as approved at the 46th Session of the Codex Alimentarius Commission (CAC46):

- a) amendment to Section 2 (Elaboration of Codex standards and related texts, Relations between commodity committees and general subject committees, Food labelling, paragraph 57) and formalization of the submission of labelling provisions for non-retail containers to the Codex Committee on Food labelling for endorsement;
- b) editorial changes to Section 2 (Elaboration of Codex standards and related texts), Section 3 (Guidelines for subsidiary bodies), and Section 7 (Relations with other organizations) of the Procedural Manual as listed in Annex I of CX/CAC 23/46/2;
- c) movement of the former first part of Section 6 (Membership), entitled "Membership of the Codex Alimentarius Commission", from the Procedural Manual to the Codex website and a link to the list provided in the Procedural Manual; and
- d) editorial changes to cater for important linguistic consistencies and errors in the Arabic, Chinese, French, Russian and Spanish translations.

##### Position:

Zambia notes the issuance of the 29th edition of the Codex Procedural Manual and the amendments contained therein. Zambia welcomes the amendments and looks forward to the continued and consistent application of the Procedural Manual to Codex work to advance the purpose of the Codex Alimentarius Commission.

#### Agenda Item 4.1: Codex Committee on Spices and Culinary Herbs (CX/CAC 24/47/3 & CX/CAC 24/47/3 Add.1)

##### Part 1 – Standards and related texts submitted for final adoption

##### Standard for spices derived from dried or dehydrated fruits and berries – small cardamom

Reference: REP24/SCH, paragraph 30(i), Appendix III, Step 8

##### Background

At CCSCH7 (2024), the development of the standard for small cardamom was finalized under the leadership of the Indian delegation. The session concentrated on resolving outstanding provisions in square brackets and addressing technical queries raised by CCMAS.

##### Position:

Zambia supports the adoption of the small cardamom standard at Step 8.

**Standard for spices derived from dried or dehydrated fruits and berries – allspice, juniper berry, and star anise (REP24/SCH, paragraph 48(i), Appendix IV, Step 5/8)**

**Background:**

To expedite the development of CCSCCH standards, this standard was initiated with a focus on creating group standards based on the specific plant parts from which spices or culinary herbs are derived. The successful completion of this first group standard highlights the effectiveness of this method. Following its finalization, the standard was submitted to CAC47 for approval.

**Position:** Zambia supports the adoption of the standard at Step 5/8.

**Standard for spices derived from dried or dehydrated roots, rhizomes and bulbs – turmeric**

**Reference:** REP24/SCH, paragraph 85(i), Appendix V, Step 5/8

**Background**

The standard was advanced for adoption during its initial discussion at the first meeting. Most of the preparatory work was completed by the Electronic Working Group (EWG) before the plenary session. This included incorporating certain provisions from the Codex standard for dried and dehydrated ginger and simplifying the text.

**Position:** Zambia supports the adoption of the standard at Step 5/8.

**PART 2 – STANDARDS AND RELATED TEXTS SUBMITTED FOR ADOPTION AT STEP 5 DRAFT STANDARD FOR SPICES DERIVED FROM DRIED OR DEHYDRATED FRUITS AND BERRIES – VANILLA (REP24/SCH, PARAGRAPH 70(I), APPENDIX V)**

**Background:** After vanilla was excluded from the group standard for spices derived from dried or dehydrated fruits and berries, the CCSCCH established a separate standard (Part B) specifically for vanilla. During CCSCCH7 in 2024, the standard was reviewed and progressed to Step 5. It was also agreed that discussions at the next session (CCSCCH8, 2025) would be limited to the unresolved sections currently enclosed in square brackets.

**Position:** Zambia supports the adoption of the standard at Step 5.

**Part 3 – New work proposals**

- i. New work proposal on standard for sweet marjoram (REP24/SCH, Appendix VII), Project Document: Annex I of CX/CAC 24/47/3
- ii. New work proposal on standard for dried seeds-coriander, REP24/SCH, Appendix VIII  
Project Document: Annex II of CX/CAC 24/47/3
- iii. New work proposal on standard for large cardamom, REP24/SCH, Appendix IX, Project Document: Annex III of CX/CAC 24/47/3
- iv. New work proposal on standard for cinnamon, REP24/SCH, Appendix X, Project Document: Annex IV of CX/CAC 24/47/3

**Positions on the new work proposals**

Zambia welcomes the opportunity to develop Codex standards for sweet marjoram, dried seeds-coriander, large cardamom, and cinnamon. These standards play a vital role in facilitating international trade by promoting harmonization, ensuring quality, and addressing technical barriers. Zambia encourages the CCSCCH to explore methods that optimize the standard-setting process and effectively prioritize key trade and market considerations.

**Agenda Item 4.3: Codex Committee on Food Hygiene (CX/CAC 24/47/5 & CX/CAC 24/47/5 Add.1)****Standards and related texts submitted for final adoption**

CCFH54 discussed and agreed to submit the following standards and related texts to CAC47 for final adoption:

**1) Annex II on Fresh leafy vegetables and Annex IV on Sprouts of the Guidelines for the control of shiga toxin producing Escherichia coli (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts (CXG 99-2023) (Step 5/8)**

**Background**

Work on these guidelines began at CCFH49 (2017) and it includes a general section and four annexes focusing on specific food commodities. The general section, Annex I on raw beef and Annex III on raw milk and raw milk cheeses were adopted at CAC46 (2023) and published as CXG 99-2023. Subsequent work on Annexes II and IV was undertaken through an Electronic Working Group and a Physical Working Group at CCFH54 where consensus was established to forward the proposed draft Annex II on Fresh Leafy Vegetables and

Annex IV on Sprouts for adoption at Step 5/8, noting that these two annexes would be subsequently included as Annex II and Annex IV in CXG 99-2023.

#### **Position**

Zambia supports the final adoption of Annexes II and IV and their subsequent inclusion in CXG 99-2023.

#### **Rationale**

The Annexes were finalized taking into consideration comments from Members and it ensures that publication of a consolidated CXG 99-2023 which is in accordance with the Committee's terms of reference to control STEC which poses a health burden worldwide in addition to being an economic burden with negative impacts on food trade.

### **2) Annex III on Milk and milk products of the Guidelines for the safe use and reuse of water in food production and processing (CXG 100-2023) (Step 5/8)**

#### **Background:**

The General Section and Annex I of these Guidelines (CXG100-2023) were adopted by CAC46 and the work was underpinned by scientific advice from JEMRA. The Guidelines respond to the need for a document outlining a risk based approach to safe sourcing, use, and reuse of water fit for purpose, rather than focusing on the use of potable water or water of other quality types (e.g. clean water). Subsequent work on the Guidelines was undertaken through an Electronic Working Group and a Physical Working Group at CCFH54, including Annex II: Fish and Fishery Products and Annex III: Milk and Milk Products and agreement to create Annex IV that captures both new technologies and information removed from Annex III related to water fit-for-purpose assessment and water safety management. CCFH54 agreed to forward the draft Annex III on Milk and Milk Products to CAC47 for adoption at step 5/8 and its subsequent inclusion in CXG 100-2023.

#### **Position**

Zambia supports the final adoption of Annex III on Milk and milk products and its inclusion in CXG 100-2023.

#### **Rationale**

The Guidelines provide a risk-based approach for specific assessment of the fitness of the water for the intended purpose. The Guidelines will further contribute to the sustainable use of water in food production and processing.

### **3) Guidelines for food hygiene control measures in traditional markets for food (Step 5/8)**

#### **Background**

CCFH54 agreed to forward the proposed draft guidelines for food hygiene control measures in traditional markets for food to CAC47 for adoption at Step 5/8.

#### **Position**

Zambia supports the adoption of Guidelines for food hygiene control measures in traditional markets for food at step 5/8.

#### **Rationale**

The guidelines will provide competent authorities, food business operators (FBOs) and consumers with knowledge necessary to strengthen food hygienic capacities in these markets to assure food safety in the framework of a One Health approach. It's estimated that over 70% of consumers in the Africa and other developing nations source food for household consumption from traditional markets, while these same regions experience very high rates of foodborne disease, hence it was critical that such markets were addressed in Codex texts.

#### **Standards and related texts submitted for adoption at Step 5**

### **1) Revised Guidelines on the application of the general principles of food hygiene to the control of pathogenic *Vibrio* species in seafood (CXG 73-2010)**

#### **Background**

The revision was conducted by an EWG and Virtual Working Group (VWG) chaired by Japan, and co-chaired by Chile. CCFH53 had decided to initiate the revision, subsequently approved by CAC46, of the Guidelines and established an EWG. After CCFH53, the EWG conducted one round of consultations, followed by a VWG meeting on February 26, 2024. CCFH54 agreed to forward the proposed draft revised guidelines to CAC47 for adoption at Step 5, noting that all references to water remained in square brackets and that the document was aligned with CXC 1-1969. CCFH54 also agreed to revisit this text as soon as Annex II on Fish and Fishery

Products of the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023) is completed.

**Position:**

Zambia supports adoption of the Revised Guidelines on the application of the general principles of food hygiene to the control of pathogenic *Vibrio* species in seafood (CXG 73-2010) at step 5.

**Rationale**

The increase in cases of foodborne disease attributed to pathogenic *Vibrio* species, particularly presence of pathogenic *Vibrio* spp. in seafood has led to a disruption in international trade. The guidelines provide specific guidance on risk management strategies for control of related food safety concerns. In addition, completion of this work is related to the finalization of Annex II on Fish and fishery products of CXG 100-2023 and thus the adoption at step 5.

**Proposals to elaborate new work or revise standards****1) New work proposal on the revision of the Guidelines on the application of general principles of food hygiene to the control of viruses in food (CXG 79-2012)****Background:**

Since the publication of CXG 79-2012, new scientific information for the control of viruses in food has been made available. Risk assessment models have been developed, including a quantitative risk model on norovirus (NoV) in bivalve molluscan shellfish. FAO/WHO published technical guidance for the development of the growing area aspects of bivalve mollusc sanitation programmes. There have been technical advancements in viral detection in specific commodities and in assessing potential infectivity of viruses, as well as new scientific findings on the use of indicators to monitor seawater quality of molluscs growing areas. CXG 79-2012 currently covers human enteric viruses, more specifically hepatitis A virus (HAV) and norovirus (NoV) and is applicable to all foods, with a focus on ready-to-eat food. It also contains two Annexes for the control of HAV and NoV in specific commodities i.e. bivalve molluscs (Annex I) and fresh produce (Annex II).

**Position**

Zambia supports approval of work for the revision of the Guidelines on the application of general principles of food hygiene to the control of viruses in food (CXG 79-2012).

**Rationale**

The revision will provide updated guidance to competent authorities and food business operators on a framework for the control of human foodborne viruses in food based on the latest scientific advice from FAO/WHO. It will also ensure alignment of CXG 79-2012 with the revision of the General Principles of Food Hygiene (CXC 1-1969) in addition to expansion of the scope to address other foodborne viral infections such as hepatitis E (HEV).

**2) New work proposal on the revision of the Guidelines for the control of *Campylobacter* and *Salmonella* in chicken meat (CXG 78-2011)****Background:**

At the request of CCFH, FAO/WHO through JEMRA brought together two expert panels to provide scientific advice on *Campylobacter* and *Salmonella* in chicken meat (on September 12-16, 2022 and February 6-10, 2023 respectively). To note where several critical developments in the last decade such as biosecurity, and production management approaches that employ multiple good production practices, such as hygiene practices and sanitation, that can enhance control of *Campylobacter* in meat chickens and the need to include controlled access to breeding flocks. recognizing the heightened risk factors of access and the downstream impacts of flocks contaminated with *Salmonella* and clarification of the use of cleaning compounds and disinfectants as Good Hygienic Practices (GHP).

**Position:**

Zambia supports approval of work for the revision of the Guidelines for the control of *Campylobacter* and *Salmonella* in chicken meat (CXG 78-2011).

**Rationale**

The revision will provide risk management options based on the latest scientific advice from FAO/WHO and will incorporate relevant aspects of the latest revision of the General Principles of Food Hygiene (CXC 1-1969).

**3) New work proposal on the revision of the Guidelines on the application of general principles of food hygiene to the control of *Listeria monocytogenes* in foods (CXG 61-2007).**

## Background

In 2020, a virtual JEMRA meeting reviewed recent data on *L. monocytogenes* to assess the need to modify, update, or develop new risk assessment models and tools for this pathogen. CCFH52 (2022) supported the proposal that JEMRA undertake full primary-production-to-consumption risk assessments of *L. monocytogenes* in foods. In response, a call for data and experts was issued in 2022 to inform two meetings, in 2022 and 2023. Summaries and conclusions of the meetings were published thereafter, which included recommendations and considerations to inform a possible revision of CXG 61-2007.

## Position

Zambia supports approval of work for the revision of the Guidelines on the application of general principles of food hygiene to the control of *Listeria monocytogenes* in foods (CXG 61-2007).

## Rationale

New scientific information provided by JEMRA justifies the need and timeliness for revision of CXG 61-2007.

### Agenda Item 4.4: Codex Committee on Contaminants in Foods (CX/CAC 24/47/6 & CX/CAC 24/47/6 Add.1)

#### Standards and related texts submitted for final adoption

1) MLs for lead in spices, dried aril; dried seeds (including a separate ML for celery seeds); dried rhizomes and roots; dried floral parts; and spices, dried fruit and berries (including separate MLs for Sichuan pepper, star anise, paprika and sumac) for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995) (Step 5/8)

## Position

Zambia supports the adoption of the proposed MLs for Spices,

## Rationale

Zambia recognizes the importance of reducing lead levels in all food products due to public health and safety concerns. Zambia welcome the establishment of MLs as a step towards ensuring safer food systems.

#### 2) MLs for lead and cadmium in quinoa for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995)

## Background:

At the request of CCCF16 (2023), a call for data on cadmium and lead contamination in quinoa was issued. JECFA undertook analysis of the data points obtained through the GEMS/Food database and concluded that MLs of 0.1 or 0.2 mg/kg for cadmium and lead in quinoa would have little impact on dietary exposure to both heavy metals. CCFL17 proposes MLs of 0.15 mg/kg for cadmium and 0.2 mg/kg for lead for adoption as they represent the lowest rejection rates worldwide.

## Position:

Zambia supports the adoption of the proposed MLs for cadmium (0.15 mg/kg) and lead (0.2 mg/kg) in quinoa.

## Rationale:

Available scientific data that was evaluated support the establishment of the MLs and the MLs have been established in accordance with the ALARA principle. The proposed MLs will safeguard public health and facilitate international trade.

#### 3) Code of practice for the prevention and reduction of ciguatera poisoning (Step 5/8)

## Background:

CAC46 (2023) approved new work on a Code of Practice (CoP)/Guidelines for the prevention or reduction of ciguatera poisoning. Work was undertaken through an EWG and the EWG concluded that a CoP was appropriate. A PWG prior to CCCF17 reviewed and revised the draft CoP and subsequently, the Committee agreed to forward the code of practice for the prevention and reduction of ciguatera poisoning to CAC47 for adoption at Step 5/8. It was further agreed that the Codex Secretariat publishes the information on resources (examples of monitoring programmes, training and guidance resources) with the relevant links, as an information document.

## Position:

Zambia supports the adoption of the Code of practice for the prevention and reduction of ciguatera poisoning at step 5/8.

**Rationale**

Ciguatoxic poisoning (CP) is a global health concern and is increasing in prevalence, especially in coastal communities that rely on local fishing as a food supply and as a source of income. The code of practice provides guidance on recommended practices to prevent or reduce CP for different types of stakeholders including competent authorities, fish sector operators (fishers, seafood processors, and seafood retail workers), health care professionals, and consumers.

**4) Sampling plan for methylmercury in fish for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995) (Step 5/8)****Background:**

Upon progression of the MLs for methylmercury in fish, CCCF11 (2017) determined that appropriate sampling plans should be established. A general sampling plan for methylmercury in fish was developed using European Union (EU): Commission Regulation (EC) No 333/2007 as a basis. CCCF12 agreed to send the sampling plan to the CCMAS. The sampling plan has been a discussion at the subsequent CCCF and CCMAS sessions with CCMAS43 endorsing it and agreed to submit it for adoption by CAC47 at step 5/8 in addition to including it in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).

**Position:**

Zambia supports the adoption of the sampling plan for methylmercury in fish at step 5/8 for inclusion in CXS 193-1995.

**Rationale**

The sampling plan has undergone adequate evaluation by CCCF and CCMAS and is supported by adequate data. It defines conditions for representative sampling and reliable analytical results to support decision-making.

**Standards and related texts submitted for adoption at Step 5****1) MLs for lead in dried bark and dried culinary herbs for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995)****Background:**

CCCF17 (2024) agreed to establish an ML of 2.5 mg/kg to be advanced to Step 5 for dried culinary herbs, to change "humidity" with "moisture content" in the note to the ML, and to request the JECFA Secretariat to issue a call for data for lead in dried culinary herbs and that the EWG should consider new available data in their review. CCCF17 (2024) further agreed to advance the ML of 2.5 mg/kg for dried bark to Step 5 and to further consider new data in the following year should such data be made available.

**Position**

Zambia supports the adoption of ML of 2.5 mg/kg for lead in both dried bark and dried culinary herbs at step

**Rationale:**

While there was general agreement on proposals for MLs of 2.5 mg/kg for dried culinary herbs and dried bark, some Members expressed that data available should support a lower ML i.e. 1.5 mg/kg for dried culinary herbs while consideration is also provided for new data on lead contamination in dried bark.

**1) Sampling plans for total Aflatoxins and Ochratoxin A in certain spices (dried chilli pepper and paprika, and nutmeg) for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995)****Background:**

CCCF17 (2024) discussed sampling plans for total Aflatoxins and Ochratoxin A in certain spices (dried chilli pepper and paprika, and nutmeg), including definition of the different sizes of particles, of sampling modes, decision rules, numerical performance criteria for analysis methods, etc. The Committee agreed to: Forward the sampling plan to CAC47 for adoption at Step 5. Re-establishment of the EWG chaired by India to address outstanding issues. Request CCEXEC86 to extend the deadline for completion of the work to 2025

**Position:**

Zambia supports the adoption of the sampling plans for total Aflatoxins and Ochratoxin A in certain spices at step 5.

**Rationale:**

To address outstanding issues with a view of finalizing the work at CCCF18.

Proposals to elaborate new work or revise a standard

### **1) New work on the revision of the Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004)**

#### **Background:**

CCCF16 (2023) identified revision of the Code of practice (CoP) for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004) as part of an overall work on the review of Codex standards for contaminants. An ML for total aflatoxins of 15 µg/kg for peanuts for further processing is adopted by the Codex Alimentarius Commission (CAC) and a proposed ML for ready-to-eat (RTE) peanuts is under consideration by CCCF. Aflatoxins were last evaluated by JECFA83 (2017) which reaffirmed the conclusions of JECFA49 (1997) that aflatoxins are genotoxic human liver carcinogens.

#### **Position:**

Zambia supports approval of the new work on the revision of CXC 55-2004.

#### **Rationale:**

Revision of the CoP will ensure that new scientific information is considered to enhance risk management measures to prevent and/or reduce aflatoxin contamination in peanuts, supported by scientific data..

### **2) New work on a code of practice for the prevention and reduction of cadmium contamination in foods**

#### **Background:**

JECFA73 (2011) conducted a re-evaluation of cadmium and established a provisional tolerable monthly intake (PTMI) of 25 µg/kg bw, reflecting the long half-life of cadmium in humans. Dietary exposure estimates indicated that cereals and cereal products, vegetables, seafood, and meat, including offal, were the major contributors to cadmium dietary exposure. JECFA77 (2013) assessed dietary exposure to cadmium from cocoa and cocoa products following a request from CCCF6 (2012). JECFA estimated total dietary cadmium exposure as 30-69% of the PTMI for adults and 96% for children aged 0.5 – 12 years. JECFA91 (2021) conducted a new exposure assessment that included the contribution of cadmium from all food sources, in particular cocoa products. This assessment was based on more comprehensive occurrence data, including a wider geographical range of occurrence data in cocoa products. JECFA concluded that the major contributors to dietary cadmium exposure were cereals and cereal products, vegetables, and seafood, while the contribution of cocoa products to dietary cadmium exposure was minor (0.1-9.4%). Between 2018 and 2022, CCCF adopted MLs for cadmium in chocolate containing or declaring < 30%, ≥ 30% to < 50%, ≥ 50% to < 70%, and ≥ 70% total cocoa solids, and 100% cocoa powder, as well as the Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans (CXC 81-2022).

#### **Position:**

Zambia supports approval of the new work on a code of practice for the prevention and reduction of cadmium contamination in foods

#### **Rationale:**

The new work can help to reduce exposures to cadmium in food. In addition, development and implementation of this CoP will provide practical measures, supported by scientific data, to prevent or reduce cadmium contamination in wide range of foods other than cocoa beans.

#### **Work proposed for discontinuation**

### **1) Draft MLs for lead in dried spices, flowers; and fresh culinary herbs in CXS 193-1995**

#### **Background:**

CCCF17 (2024) expressed general support to discontinue work on the ML for lead in for spices, dried flowers because Members considered that in most countries, chamomile is mostly used as herbal infusions. CCCF17 (2024) further agreed to discontinue work on lead in fresh culinary herbs, in light of continuation of the development of an ML for dried culinary herbs.

#### **Position:**

Zambia supports discontinuation of the draft MLs for lead in dried spices, flowers; and fresh culinary herbs.

#### **Rationale:**

Chamomile (spices, dried flowers) is mostly used in herbal infusions while the ML for lead in fresh culinary herbs can be derived from the ML for dried culinary herbs, taking into account the moisture water content of the fresh and the dry herbs.



### Agenda Item 4.13: CODEX COMMITTEE ON FOOD LABELLING

#### CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX STANDARDS (ENDORSEMENT) (CX/FL 24/48/4)

##### a) Codex Committee on Spices and Culinary Herbs (CCSCH)

1. Draft standard for dried floral parts - dried saffron
2. Draft standard for dried or dehydrated roots, rhizomes and bulbs - turmeric

#### BACKGROUND

During CCFL47, the Committee rejected the endorsement of the provision of both country of origin and country of harvest in the standard for saffron and tumeric noting that it was a major departure from CXS 1-1985. The Committee requested CCSCH to clarify the distinction between country of origin and country of harvest; and provide the rationale why the provision for the country harvest should be mandatory and how such a declaration would be beneficial for fraud prevention (REP23/FL, Para 17 (ii)). In response CCSCH noted that the provision in CXS 1-1985 as related to country of origin is broad and applicable to all food commodities and that country of origin and country of harvest may be the same. However, CCSCH avers that the quality characteristics of saffron vary considerably depending on the country where it has been cultivated and hence the need to have a country of harvest, a unique requirement for herbs and spices (CX/FL 24/48/4 appendix II).

**Position:** Zambia does not support the inclusion of the country of harvest and the matter must be referred to the Committees for resolution regarding country of Harvest

**Rationale:** The country of origin clearly addresses the origin of products and allowing inclusion of the country of harvest may open doors for similar requests for other products without adding any value to the labelling. There is therefore no justification in terms of safety for the country of harvest to be mandatory, and its inclusion borders on geographical advantage rather than fraud or safety. The Committee did not justify how the use of the country of harvest would address the issue of fraud as requested by CCFL47.

##### b) Standard for fish oils CXS 329-2017

#### BACKGROUND

During CCFO28, a member organisation raised a concern on the safety of calanus oil as it contains astaxanthin esters, a substance with an established acceptable daily intake (ADI) in their region. The member organisation further informed the meeting that calanus oil was only authorised in food supplements (excluding food supplements for infants and young children), up to different maximum levels established for different age groups and subject to additional labelling requirements. However, the meeting was informed that provisions linked to food supplements as regulated by specific Members were outside the scope of CXS 329-2017. To address the safety concern, the Committee introduced a requirement that maximum levels of astaxanthin in calanus oil (Section 2.1.6) shall comply with regulations of the country of retail sale (REP REP24/FO Para 102). As a result, the proposed labelling text for endorsement (*For calanus oil (Section 2.1.6), the maximum intake level of astaxanthin shall be declared if required by the country of retail sale in accordance with the acceptable daily intake established for different age groups by competent authorities*) was proposed to provide for the declaration of the contaminant where necessary.

**Issue:** Endorse the statement: "7.3 Other labelling requirements for calanus oil (Section 2.1.6), the maximum intake level of astaxanthin shall be declared if required by the country of retail sale in accordance with the acceptable daily intake established for different age groups by competent authorities"

**Position:** Zambia supports the endorsement of the proposed text for inclusion in CXS 329-2017.

**Rationale:** The statement provides flexibility of application of labelling requirements for the contaminant where ADI has been established and supports the progression of the standard.

##### c) Regional standard for castilla lulo (Naranjilla)

**Comment:** Zambia has no objection in endorsing the labelling provision for this regional standard. However, there is need for clarification on the value intended by addition of the requirement on district/ regional / local place name where the product is grown as part of the origin of the produce.

**Rationale:** CXS 1-1985 which is the reference standard for labelling of products only requires a country of origin without necessarily indicating further details as required by this regional standard.

#### REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING (STEP 7) - COMMENTS IN REPLY TO CL 2024/53 -FL CX/FL 24/48/5 ADD. 1 (PART A)

#### BACKGROUND



CCFL47 discussed and advanced the draft provision to step 5 for adoption. The Committee agreed to establish an EWG group to discuss and agree on the remaining parts at step 6 (definition of food allergen, section 4.2.1.6 on exemptions, expression of sulphites (Section 4.2.1.7) and declaration of certain foods and ingredients related to clauses 8.3.1, 8.3.2 and 8.3.2.1) to enable the standard to progress to step 8 after CCFL48. The major issue during CCFL47 was on whether or not to maintain the words 'substances or processing aids' hence maintained in square brackets for further discussion. The Chair of the EWG recommended that CCFL48 discuss and resolve the outstanding issues. The EWG group provided two options for the definition of food allergens while for exemption it recommended that the basis of exemption by national authority be based on the criteria established in FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens. Regarding the form of expression for sulphites the EWG provided in square brackets 'as offered to the consumer' or 'food as consumed' for CCFL48 to discuss and adopt either.

**Issue 1:** Definition of food allergy

**Position:** Zambia supports the adoption of the second option text with slight editorial amendment.

*"Food Allergen" means a food (including food ingredients, food additives and processing aids) that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, usually caused by a protein or protein derivative in the food".*

**Rationale:** The improvement of text is to ensure that both food and ingredients, which independently may be a source of allergen, are considered in the definition. This is supported by CXS 1-1995, which defines both terms (food and ingredients) differently.

**Issue 2:** Section 4.2.1.4 and 4.2.1.5 – Scientific names for tree nuts

**Position:** Zambia supports the scientific names as provided in Section 4.2.1.4 and 4.2.1.5

**Rationale:** The names accommodate all species of the tree nuts

**Issue 3:** Section 4.2.1.6 – Exemptions

**Position:** Zambia supports the use of the criteria for exemption established in FAO and WHO (2024) Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens rather than developing or adopting a list of exemption

**Rationale:** The FAO/WHO publication provides a scientific basis for determining criteria for exemption from mandatory listing.

**Issue 4:** Section 4.2.1.7 – Sulphite when present in concentrations of 10 mg/kg or more in a food [as offered to the consumer/as consumed] shall always be declared using the specified name 'sulphite' or 'sulfite' in addition to or as part of the ingredient name.

**Position:** Zambia supports deleting the square brackets and declaring sulphites as consumed so as to read, "Sulphite when present in concentrations of 10 mg/kg or more in a food ~~as offered to the consumer/as consumed~~ shall always be declared using the specified name 'sulphite' or 'sulfite' in addition to or as part of the ingredient name".

**Rationale:** It is a challenge to be certain that consumers will prepare the products offered in strict adherence to the direction of use especially where reconstitution or dilution is required before consumption. As a result, a significant population may be exposed to the risk of exposure especially where the dilution/reconstitution is expected to reduce the concentration.

**GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING (STEP 4) CX/FL24/48/5 (PART B) - COMMENTS IN REPLY TO CL 2024/53-FL; CX/FL24/48/5 ADD.1 (PART B)**

**BACKGROUND**

At CC47, the Committee agreed to return the Annex to the GSLPF – Guidelines on the use of precautionary allergen labelling to Step 2, for further drafting and to re-establish a EWG. A request was made to the Codex Committee on Methods of Analysis and Sampling (CCMAS) to recommend suitable analytical methods and guidance on their validation and applications including sampling plans for determining allergenic protein in foods. In carrying out its work, the EWG circulated two consultation papers (CP1 and CP2) in February and June 2024 respectively, on the proposed draft revision to GSLPF relevant to allergen labelling (Part A) and proposed draft guidelines for PAL (Part B). The EWG took into account scientific advice from the Expert Committee report (February 2024) and International Social Science Liaison Group (ISSLG) evidence on consumer understanding of allergen labeling and advisory statements on PAL guidance. The FAO/WHO Expert Committee's Part 5 report provides reference doses for allergens proposed for section 4.2.1.5 of the GSLPF but not for barley and rye (or gluten) and that these foods/ingredients were also not considered in the Expert Committee's Part 2 report. CCFL48 is requested to consider:

- i) The key issues described in paragraph 16 regarding of the EWG report being:
- a) Purpose section in regard to determining if and how PAL thresholds can address cross contact from gluten containing cereals for consumers with coeliac disease.
  - b) Principle 4.2 in regard to proposed alternative text on the types of risk assessment.
  - c) Principle 4.3 and the table of reference doses in 4.3.1 particularly in relation to inclusion of gluten.
- ii) Whether the Annex to the GSLPF – Guidelines on the use of precautionary allergen labelling (Appendix II) is ready to advance to Step 5.
- iii) Whether to provide further advice to CCFH to ensure consistency of the Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020) and the Annex to the GSLPF, and request CCFH consider providing guidance on UAP risk assessment.

**Issue 1:** Purpose section to determine if and how PAL thresholds can address cross contact from gluten containing cereals for consumers with coeliac disease. The text below was proposed:

*Purpose: To facilitate a consistent and harmonized approach to the effective use of Precautionary Allergen Labelling (PAL) for communicating to consumers with food allergy or coeliac disease about the risk from the unintended presence of allergens in food due to cross-contact.*

**Position:** Zambia supports the amended proposed text.

**Rationale:** This is work in progress. The guidelines have taken all cereals containing gluten into account. How to determine the threshold could be a challenge as we do not have the capacity. The FAO Expert Committee reports have stated the thresholds based on science, therefore we support the proposed thresholds aligned to the reports availed.

**Issue 2:** To consider principle 4.2 in regard to proposed alternative text on the types of risk assessment. The EWG discussed the text in square brackets [ ]

***[4.2 The decision to use PAL shall be based on the findings of a risk assessment (quantitative, qualitative, or both) to determine the risk of presence of amounts of unintended food allergens relative to an appropriate action level.]***

The EWG agreed on the text provided below:

***4.2 The decision to use PAL shall be based on the findings of a risk assessment of unintended allergen presence to determine potential exposure above a reference dose.***

**Position:** Zambia supports the text as agreed by the EWG.

**Rationale:** The use of PAL is understood to apply despite the effective use of allergen management being in place. Therefore to use PAL, Food Business Operators should ensure that risk assessment has been conducted to ensure exposure levels are below the reference doses. The type of risk assessment can be quantitative and/or qualitative. There is a need for regulatory authorities to ensure that all foodstuffs with or without PAL have undergone a risk assessment (FAO and WHO (2023): Risk assessment of food allergens – Part 3: Review and establish precautionary labelling in foods of the priority allergens (Sections 3.3.1 to 3.3.6) for priority allergenic foods. This will build consumer confidence, reliance and trust in PAL.

**Issue 3:** To consider principle 4.3 and the table of reference doses in 4.3.1 particularly in relation to inclusion of gluten

**Position:** Zambia supports the reference doses as proposed in section 4.3.1.

**Rationale:** The established values are based on a strong scientific basis of ED05 reference doses as recommended by FAO/WHO experts committee and where risk management approach was used in establishing the values, consideration was made to ensure that consumers' safety was prioritised.

**Issue 4:** CCFH to consider whether the Annex to the GSLPF – Guidelines on the use of precautionary allergen labelling (Appendix II) is ready to advance to Step 5

**Position:** Zambia supports progression of the document.

**Rationale:** The EWG have addressed most of the areas of concern and taken into consideration the relevant reports of the Expert Committee. The African Union is keen to see the advancement of the guidelines and looks forward to progressive discussions.

**Issue 5:** Whether to provide further advice to CCFH to ensure consistency of the Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020) and the Annex to the GSLPF, and request CCFH to consider providing guidance on UAP risk assessment.

**Position:** Zambia supports the proposed approach.

**Rationale:** The Expert Committee (Report 3, table 3) emphasizes certain UAP factors that should or should not be considered for or addressed by PAL, therefore providing guidance on UAP risk assessment would further assist Food Business operators. The recommendation for CCFH to ensure consistency with the CoP/Annex to GSLPF is to ensure alignment of Codex text for effective allergen management.

**PROPOSED DRAFT GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PRE-PACKAGED FOODS TO BE OFFERED VIA E-COMMERCE: (STEP 7) CX/FL 24/48/6 - COMMENTS IN REPLY TO CL 2024/54-FL; CX/FL24/48/5 ADD.1**

**BACKGROUND**

During CCFL47, the committee agreed to develop the guidelines as a stand-alone document which will be published with a link to other relevant Codex documents (REP23/FL). The proposed draft guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce was presented to CAC46 and adopted at Step 5. A EWG was re-established to further develop the text enclosed in square brackets. Most of the text in square brackets was agreed upon including: Purpose section, Section 5.3 regarding Small Unit Exemptions and Section 5.4 regarding costs for the consumer. The outstanding discussion regarding “durability” required further engagement. The EWG had numerous discussions on the text in brackets under Section 5.1 regarding the definition of ‘durability’ and suggestions of alternate wording for both the ‘indication of durability’ clause and the ‘durability’ definition. Most EWG members wanted the provision of a form of the ‘indication of durability’ on the e-page, but there was no clear consensus on the wording. It is expected that CCFL48 will reach a consensus on the matter for the draft guidelines to progress for adoption at step 8. Hence three (3) options of the wording was provided:

Option A: [An indication of durability of pre-packaged food is encouraged to be provided.] [For the purpose of this clause, “durability” means the period between the point of delivery and the best-before or use-by date in which the food retains its specific properties when properly stored.]

Option B: [It is encouraged that an indication of the minimum number of days the product will be delivered to the final consumer before the “Use-by Date”, “Expiration Date”, “Best-Before Date” or “Best Quality Before Date” be provided’],

Option C: the ‘indication of durability’ clause and definition should be removed entirely.

**Position:** Zambia supports the modification as proposed in option A.

**Rationale:** An indication of the durability will guide both purchaser and competent authorities in making decisions on the period within which the product is expected to arrive before the expiration of the product. Hence the definition also provides common understanding on the use of the term in this context.

**PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING (CX/FL 24/48/7) - COMMENTS IN REPLY TO CL 2024/55-FL; CX/FL24/48/7 ADD.1**

**BACKGROUND**

CCFL44 commenced work on “Innovation – use of technology in labelling”, which was described as new approaches for providing consumers information about the foods they buy. CCFL47 forwarded the draft guidelines to CAC46 and it was adopted at step 5. CCFL47 re-established the EWG to further develop the draft guidelines for circulation for comments at Step 6 and consideration by CCFL48 with a special focus on the text in square brackets. The EWG discussed all the issues in the [square brackets] extensively (REP23/FL) including key issues relating to the need for a provision on guidance on the length of time mandatory food information provided solely using technology should be made available, and that food products with a use-by/expiration date, should have food information available until that date. Inclusion of a reference to the information being audible as well as legible (Section 7.10) was tabled to be discussed at CCFL48 as well as introduction of section 7.12 on consumers not incurring additional cost to access food information via technology.

**Response to recommendations by EWG:**

**Issue 1:** review the addition of [audible] in section 7.10 and the new provision on costs in section 7.12 to align with the work on e-commerce.

- i) 7.10 Food information described or presented using technology shall be clear, prominent and readily legible [or audible] to the consumer under normal settings and conditions of use of the technological platform.
- ii) [7.12 Where food information is provided using technology, it shall be provided without any additional costs for the consumer.]

**Position:**

(i) Zambia supports with amendment to 7.10, i.e. deletion of the word “or” and “readily” and proposes addition of “**where applicable**” to the text to read: “Food information described or presented using technology shall be clear, prominent and ~~readily~~ legible [~~or and audible (where applicable)~~] to the consumer under normal settings and conditions of use of the technological platform.

(ii) Zambia supports efforts which have gone towards inclusion of the new section 7.12.

**Rationale:**

(i) The use of “or” suggests that the use of technology for providing information shall be legible or audible, thus providing an option to the manufacturer to present the information in either way. This is not consistent with GSLPF as the intention of section 7.10 is not providing permission to provide labelling information audibly, it is simply saying that if audio is used to provide information, it must be audible over and above the information being legible. The wording “audible” should be inserted in Section 7.1 (Draft Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce) to ensure alignment in e-commerce.

(ii) Manufacturers have already incorporated the cost of a physical label into the cost of the product, therefore access to information using technology should not be provided as an additional cost to the consumer.

**Issue 2:** consider whether the Guidelines on the Use of Technology to Provide Food Information in Food Labelling (Appendix II) is ready to advance to Step 8

**Comment:** Zambia looks forward to further discussions on the issues that have been raised.

#### **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) -CX/FL 24/48/8 - COMMENTS IN REPLY TO CL 2024/56-FL; CX/FL24/48/8 ADD.1**

**BACKGROUND**

At the 47<sup>th</sup> session of the Codex Committee on Food Labelling (CCFL47), the committee agreed to initiate further work on the labelling of pre-packaged foods in joint presentation and multipack formats. This follows discussions from the CCFL 44, CCFL45 and CCFL46 and that a project document should be submitted to CAC46 for approval and an EWG be established. Draft text by EWG was circulated to members for comments at Step 3. Consultations with EWG were held, in which members were requested to respond to questions in the "Proposed Draft Revision of the GSLPF (CXS 1-1985) ", concerning labelling of pre-packaged foods in joint presentation and multipack formats, based on the gaps identified through responses to the Circular Letter (CL) CL 2022/10-FL.

Comments are summarised in Appendix I, while proposed amendments to the provisions in the GSLPF (CXS 1-1985): relevant to joint presentation and multipack formats are presented in Appendix II. The amendments to the following areas of the GSLPF were with regards to the scope, defining terms (to include joint presentation and multipack formats), names of the food, list of ingredients, net content, name and address, lot identification, date marking and storage instructions and presentation of mandatory information.

**Issue:**

i) Review the proposed amendments to the General standard for the labelling of prepackaged foods (CXS 1-1985) provisions relevant to joint presentation and multipack formats (Appendix II)

ii) Consider whether the text is ready to advance in the step process

**Position:**

Zambia supports the proposed amendments to the GSLPF (CXS 1-1985) relevant to joint presentation and multipack formats and recommends advancement of the text in the step process.

**Rationale:**

The proposed amendments to the standard will strengthen the provisions in GSLPF (CXS 1-1985) and ensure concise information is provided to consumers regarding prepackaged foods in relation to joint presentation and multipack formats. Since the GSLPF (CXS1-1985) scope covers pre-packaged foods with regards to joint presentation and multipack formats, modification of the definition to include joint presentation and multipack formats is necessary. Provision of detailed information on presentation of mandatory information will ensure that the draft standard adequately covers the identified gaps in the project document.

#### **Agenda Item 9: LABELLING OF ALCOHOLIC BEVERAGES CX/FL 24/48/9- DISCUSSION PAPER**

**BACKGROUND**

During the 47<sup>th</sup> session of the Committee on Food Labelling (CCFL47), the committee agreed to retain the item on labelling of alcoholic beverages on its agenda and requested WHO to prepare a discussion paper for consideration at CCFL48. A circular letter (CL 2024/13-FL2) was issued for comments with the background that mandatory labelling requirements in Codex texts seemed not to be consistently applied to alcoholic beverages across Codex Members and that mandatory information related to alcohol consumption is currently not covered by Codex texts. Such mandatory labelling requirements would include; health and nutrition-related information, restrictions, exemptions, possible links between alcohol and health outcomes; and, if such provisions were to be developed, to outline possible scenarios for the development of mandatory requirements to be submitted for consideration by the CCFL48. The discussion paper proposes to:

- i). Develop mandatory labelling requirements tailored to alcoholic beverages and determining the scope of such work considering the respondents' proposals and level of support on,
- ii). Revise the standard definition of food and developing new standard definitions, namely:
  - Revision of the standard definition of "food" to explicitly include alcoholic beverages;
  - Development of a standard definition of "drinks", including alcoholic beverages;
  - Development of a standard definition of "non-alcoholic drinks";
  - Development of a standard definition of "alcoholic beverages"
- iii). Revise and amend existing Codex standards and related texts to include specific provisions on:
  - Applicability of existing Codex texts to alcoholic beverages.
  - Mandatory labelling requirements tailored to alcoholic beverages developed by CCFL
- iv). Consider the alternative of developing a new Codex standard exclusively dedicated to alcoholic beverage labelling.

#### **Position**

Zambia recognizes the negative impacts that alcohol has on health, the need to capacitate countries to develop national regulations on labelling of alcoholic beverages, and the international guidelines that exist for countries to use to develop their legislation. We look forward to the clarification on whether "alcohol" is food or a non-food item as the discussions progress.

### **APPLICATION OF FOOD LABELLING IN EMERGENCIES CX/FL 24/48/10 -DISCUSSION PAPERS**

#### **BACKGROUND**

During its 46<sup>th</sup> session, CCFL discussed the possibility of future work to assist countries in establishing flexibilities in food labelling requirements to assure resilience in the supply chain during national or global public health emergencies. This was necessitated by the observed disruptions in the supply chain as a result of emergencies in recent years, such as the COVID-19 pandemic, which led many countries to consider implementing certain temporary exemptions to food labelling requirements, for a safe and adequate food supply. Currently, Codex texts do not provide guidance on whether and how countries may consider such exemptions in emergency situations, when deemed necessary. CCFL 46 agreed that the United States of America prepares a discussion paper and outline possible new work for consideration by CCFL and that a Circular Letter (CL) would be issued to request information to support the development of this discussion paper. It was further observed that some countries/regions have implemented a number of temporary labelling flexibilities to address challenges in supply chain; leading to the need for a well-structured framework that would ensure consumer protection and fair food trade. The discussion paper, while taking into account responses to the circular letter issued, presents areas of priority discussion including purpose, scope, definitions, principles and criteria as well as roles and processes.

#### **Position**

Zambia supports the work and will be following discussions on developing guidelines on food labelling in emergencies. In terms of criteria and principles, Zambia is of the view that labelling in emergencies should be based on risk and that labeling should never compromise food safety and nutrition in such emergencies. The proposed discussion paper is important as it will guide and promote safe food trade among countries and ensure there is little or no disruption in the food supply chain in times of emergencies. Considering the several emergencies that not only have to do with public health issues, there is need to re-define emergency so that it goes beyond pandemics in order to address food safety, food security and nutrition matters in any global emergency as it relates to labelling of food for protection of consumers and promotion of fair food trade.

### **SUSTAINABILITY LABELLING CLAIMS CX/FL 24/48/12 - DISCUSSION PAPERS**

#### **BACKGROUND**

During CCFL47, New Zealand, with assistance from the EU, presented a discussion paper on sustainability-related labelling which concluded that the new work is within the terms of reference of CCFL. There was also a need for CCFL to provide additional high-level guidance on sustainability-related labelling to ensure they meet the requirements of the guidelines and ensure they are not misleading, substantiated and meaningful. This guidance would assist governments and other relevant stakeholders looking to regulate, develop, and/or implement such labelling requirements. CCFL agreed that sustainability was an important topic for Codex however, views differed on whether this was the right moment to start new Codex work on sustainability-related labelling or if further reflection was needed to better define what was to be achieved. The Committee therefore agreed to establish an EWG to revise the discussion paper taking into account the discussions in CCFL47 and prepare a project document with a focus on:

- Stock-taking work being undertaken by other international organisations on sustainability-related labelling claims on food;
- Identifying areas where CCFL could provide guidance on sustainability-related labelling claims on food;
- Taking into account the above, identify possible revisions to the General guidelines on claims (CXG 1-1979) for claims in general, and sustainability-related labelling claims on food.

The revised project paper developed by the EWG invites CCFL48 to:

- i). Consider that guidance on sustainability-related labelling claims provided by CCFL be limited to environmental claims with a focus on ensuring these are meaningful and not misleading.
- ii). Consider initiating new work on environmental claims as presented in the project document in Appendix II.
- iii). Consider that the guidance on environmental claims provided by CCFL be included in the General guidelines on claims (CXG 1-1979)

### **Position**

Zambia agrees that there is a need to provide guidance on sustainability claims especially related to the environment as a way to enable manufacturing to contribute to SDG 13. However, the claims must be substantiated and accurate to avoid falsification. As a result, Zambia looks forward to discussions and development of the project paper for approval by CAC.

## **SUGAR LABELLING –DEFINITION FOR “ADDED SUGARS” CX/FL 24/48/13 - DISCUSSION PAPERS**

### **BACKGROUND**

Sugar content in food has become a key element for consumers' purchasing decisions, driven by health concerns, dietary trends, taste preferences, and the impact on energy consumption. Awareness on health effects of highly sugary foods has influenced nutrition labelling and consumer demand for foods low in sugars. Similarly, low-carb diets and the demand for low-energy options have driven innovation in the food industry, offering alternatives with low-energy sweeteners or no added sugar. By clearly displaying the added sugar content on the front of the package, consumers can easily compare different products and make healthier choices. Labels with the claim "no added sugar" are becoming increasingly common. In addition, added sugars are frequently used as part of the rationale for front-of-pack nutrition labelling (FOPNL).

During the CCFL47, there were discussions on the need to establish a definition of added sugars to be incorporated in the Guidelines on Nutrition Labelling (CXG 2-1985), and to consider the inclusion of the declaration for added sugars in Section 3.2 "Listing of nutrients". It was noted that harmonization of the definition and declaration of added sugars on nutrition labelling was important to provide consumers with accurate information on the sugar content of foods, thereby enabling them to make healthier choices, as well as incentivizing manufacturers to follow recommendations to reduce the amount of added sugars in their products.

CCFL47 agreed that Costa Rica would prepare a discussion paper on the definition for "added sugars" which will take into account the need for including "added sugar" on the nutrient declaration list. A Circular Letter was issued inviting information to assist with developing the discussion paper. The discussion paper invites CCFL48 to review the project document presented in Appendix II and consider:

- i) To undertake further work on the development of a definition of "added sugars".
- ii) The relevant Codex texts (Guidelines on Nutrition Labelling (CXG 2-1985) and the Guidelines for the Use of Nutrition and Health Claims (CXG 23-1997) to:
  - a) Decide where the definition of "added sugars" should be incorporated.
  - b) Analyze whether added sugar should be included in the list of nutrients to be declared.

- c) Decide whether the declaration of added sugars should be mandatory or voluntary.

### **Position**

Zambia supports the need for a clear definition of “added sugar”, as it would help consumers make informed choices and could assist in reducing the consumption of added sugars. Furthermore, a harmonized global definition would promote fair trade practices by establishing a common criterion. However there is also a need to clarify the purpose and methodologies of verification to ensure its effectiveness and applicability.

Zambia recognizes that for this new work, views from the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) should be taken into account. It recommends that should CCFL develop such a definition, it is important that the CCNFSDU be consulted, and its views taken into account during the course of the potential work. Furthermore, added sugar should be included in the nutrient declaration list on a mandatory basis, noting that providing clear and accurate information on the content of added sugars is crucial for public health reasons.

## **FUTURE WORK AND EMERGING ISSUES CX/FL 24/48/14**

### **BACKGROUND**

At the 43rd meeting of the Codex Committee on Food Labelling (CCFL43) in 2016, the Committee agreed to investigate possibilities for the future direction and work of the Committee. It was agreed that Canada would prepare a paper summarizing previously identified work that had not been taken forward, as well as presenting current work and proposals for future work. CCFL also agreed that the paper would be kept current at each session with a different delegation taking responsibility each time. This paper was subsequently presented at the CCFL44 in 2017 and updated and re-presented at CCFL45 in 2019, CCFL46 in 2021 and CCFL47 in 2023. At CCFL47, the Committee agreed that Italy would next update the discussion paper on future work and direction for CCFL. The Committee also agreed to request members and observers to provide information on issues for inclusion in the paper. A request for submissions, CL 2024/24-FL was issued to Codex members and observer organizations from February 2024 until April 2024. This paper presents: a) Potential work for CCFL; b) Emerging issues of relevance to CCFL; c) Proposals regarding work areas previously considered by the Committee; and d) An inventory table of potential CCFL future work (Appendix II), covering:

- a) “High in” claims
- b) Trans fatty acids (TFAs)
- c) Principles and Criteria for Food Labelling in Emergencies
- d) Review the definition of ‘small unit’
- e) Sustainability claims
- f) Nutrient declaration
- g) Nutrient labelling/sugar labelling
- h) Vegetarian and Vegan

**Issue 1:** The Committee is invited to consider the proposals in this discussion paper for potential new work for CCFL.

**Issue 2:** The Committee is invited to consider and agree to initiate a new work to revise the Guidelines for the Use of Nutrition and Health Claims (CXG 23-1997), as it relates to the “High in” claims as presented in the project document (Appendix I).

### **Position**

Zambia supports the approach proposed in future work and will look forward to participating in the proposed work projects.

## **APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF WORK OF CCFL CL 2024/29-FL; CX/FL 23/48/15**

### **BACKGROUND**

The 70<sup>th</sup> Session of the Executive Committee (CCEXEC70) recommended that all Committees consider the need to develop an approach for the management of their work. CCFL47 considered a revised proposal for an approach and criteria for prioritization of work of CCFL based on analysis of comments submitted at CCFL46 and in response to CL 2022/73/OCS-FL and expressed general support for the recommendations. The committee requested that the CCFL Secretariat revise the approach and criteria taking into account the discussions of CCFL47. CCFL47 also agreed that a circular letter (CL 2024/29-FL) would be issued requesting



comments on the revised document for consideration by CCFL48. The paper raises the following issues for discussion:

**Issue 1:** The Committee is invited to consider the proposed revision in Annex I of this document on an updated draft approach and criteria for evaluation and prioritization of new work.

**Issue 2:** The Committee is invited to agree that the draft approach is ready for use on a trial basis, should the need arise;

**Issue 3:** The Committee is invited to agree that any refinement to the draft approach, if needed, may be considered following experience gained with its use.

**Issue 4:** The Committee is invited to agree that “The approach and criteria for evaluation and prioritization of the work of CCFL” would remain as an information document for the Committee.

### Position

Zambia supports the proposed criteria for evaluation and prioritization of work as indicated in Annex 1 of the discussion paper. It can be used on a trial basis to determine its appropriateness and relevance.

## Agenda Item 12: Matters arising from FAO and WHO (CX/CAC 24/47/22)

### Background

The FAO and WHO have presented several key issues to the 47th session of the Codex Alimentarius Commission that reflect developments in food safety and nutrition globally. Noteworthy topics include the observance of World Food Safety Day, the progress under the UN Decade of Action on Nutrition, and updates on WHO's Global Strategy for Food Safety. Additionally, FAO and WHO's collaborative work spans essential areas such as Antimicrobial Resistance (AMR), healthy diets, scientific advice to Codex Alimentarius, and several emerging food safety challenges. The agenda being advanced by the two organizations emphasizes the need for continued global cooperation, research, and strategic interventions to address the evolving risks in food safety, such as novel production systems, indoor farming, and precision fermentation, which are shaping future food systems. Members are requested to take note of the matters and ongoing projects by FAO, WHO and/or executed jointly by the two Codex parent organisations and to take necessary actions to in line with activities going on in their respective countries or Regional Economic Communities.

### Position

Zambia appreciates the invaluable support from FAO and WHO in advancing food safety across the continent. However, as a country we have several challenges that require further targeted assistance. To build resilient food safety systems, Zambia calls for strengthened collaboration, technical capacity building, and additional resources. These efforts will ensure that food safety and regulatory frameworks are robust, equitable, and aligned with Africa and global food security and trade objectives, fostering a transparent and competitive environment that empowers us to safeguard public health and participate fully in global markets.

## Agenda Item 13: Potential webcasting of the Executive Committee (CX/CAC 24/47/23)

CCEXEC85 (2023) agreed that the document describing the key elements of a model for future Codex work (CX/EXEC 23/85/3, Appendix II) remained a living document that should be periodically reviewed in light of experiences and learnings, and that this would be further considered at CCEXEC86. The final report of the CCEXEC Subcommittee on a blueprint for the future of Codex presented a model for future Codex work which focused on:

- Meeting models (physical, virtual, and mixed formats);
- Schedule of Codex meetings; and
- Inter-session working mechanisms e.g. Electronic Working Groups (EWGs) and other virtual informal working mechanisms.

These areas have continued to evolve since the CCEXEC sub-committee undertook its work. In 2024, the format of Codex meetings continues to vary as the decision of CAC44 to allow for a virtual setting with respect to sessions of Codex Subsidiary Bodies, including CCEXEC, provides flexibility on the meeting format. The majority are being convened as in-person meetings with webcasting of the formal sessions and, where feasible, associated physical or in-session working groups. Some Codex subsidiary body meetings have been held in-person with the virtual participation e.g. CCMAS43, CCFICS26 and CCFICS27, while CCRVDF27 was webcasted and CCLAC23 was held virtually, although the top table was located together in person. Meetings of CCEXEC remain to be in-person only. However, there are calls to have online transmission of CCEXEC meetings.

### Position

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Zambia does not support the online transmission of CCEXEC meetings

**Rationale**

CCEXEC serves as the executive organ of the Commission with representation from all the Codex Regions. In particular, the Executive Committee can make recommendations to the Commission regarding matters deliberated in the meeting. Webcasting the deliberations of CCEXEC to the rest of the members may bring misunderstandings to member's delegations between the country position of members of CCEXEC and the Executive decision that members have to make on behalf of the commission. CCEXEC does not make any decision but refers to all matters to the Commission and sharing of report of CCEXEC with members ensures transparency in matters referred to the CCEXEC.