

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 8.1**

**FL49/CRD23**

**Original language only**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON FOOD LABELLING**

**Forty-ninth Session**

**Ottawa, Canada**

**11-15 May 2026**

### **COMMENTS FROM THE UNITED STATES OF AMERICA**

#### **Agenda item 8.1: Proposal for new work on the application of food labelling provisions to alcoholic beverages**

The United States fully supports the public health objective of limiting the harmful use of alcohol, but it remains unclear why work is needed on this topic in CCFL. The United States views the proposed changes to three CCFL texts as duplicative, conflicting, and contrary to Codex's purpose. We also question the justification for the proposed work and are concerned that the proposal misrepresents discussions at CCFL48, which merely agreed to keep this topic on the inventory of potential future work.

The United States is concerned that the proposal promotes policy objectives that exceed the scope of Codex's risk-based standard-setting to facilitate trade and ensure consumer health and safety. For example:

- The discussion paper cites the need to develop international standards to address eliminating ethanol completely, though we are unaware of how many Codex members maintain this as a national position. In the U.S. view, such policy objectives do not fulfill the purpose of Codex. We emphasize that there is no global consensus, in or out of Codex, that alcohol consumption should be eliminated entirely.
- The proposal refers to the WHO Global Alcohol Action Plan and alignment with WHO recommendations as a justification for this work. The United States opposes the presumption that WHO decisions should precede Codex's Member-driven process. Moreover, we are uncomfortable with the WHO's development and promotion of this proposal, which appears to be prejudicial to the good functioning of the Codex standard-setting process.
- The proposal invokes the relationship between alcohol and health to justify a call for consumer protection measures. We remain steadfast in our view that CCFL has already provided sufficient guidance for Members to implement consumer protection measures where necessary based on their national contexts.

Further, the United States believes that this proposal does not align with the strategic priorities of the Commission. Notably:

- It does not reflect Members' needs, which can already be met using CCFL's existing guidance.
- New work would be duplicative and a misuse of limited resources, undermining efficient Codex work management practices.
- Some of the proposed revisions would create trade barriers, weakening the impact, use, and visibility of Codex standards.

Regarding warning labels, the United States maintains that work on alcohol warning labels intended to influence consumer behavior is within the purview of national governments which can best determine which advisory messages address local or regional public health objectives and account for local customs and norms. Indeed, the United States has required warning labels on alcoholic beverages sold in the United States for nearly 40 years, as one element of a multifaceted approach to limit the harmful use of alcohol. The U.S. warning label is risk-based and is suited for U.S. consumers. The United States therefore maintains that warning labels are not amenable to standardization.

#### **Next steps**

The United States does not support taking on new work under this proposal. Given the lack of a clear consensus, the United States has strong concerns about establishing an EWG to further develop or refine the new work proposal. Establishing an EWG without consensus for new work is not common practice in Codex

and would require significant time and resources from committee members. The United States emphasizes that despite a continued lack of consensus, this topic has been discussed for over 10 years in this committee to no productive end. This proposal does not differ significantly from any of the proposals or discussion papers presented to the committee in the past decade and does not adequately account for the discussion at CCFL48. Taken together, these factors do not amount to sufficient justification to take on new work, nor to establish an extraordinary EWG to further develop any new work proposal on this topic. Members who wish to propose new work with a significantly revised scope on this topic may already do so following the established Codex procedures.