



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

Forty-ninth Session

11-15 May 2026

FUTURE WORK AND EMERGING ISSUES

(Prepared by Kenya)

INTRODUCTION

1. The 43rd meeting of the Codex Committee on Food Labelling (CCFL43, 2016) agreed to investigate possibilities for the future direction and work of CCFL. 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 (2017) and updated and re-presented at CCFL45 (2019), CCFL46 (2021), CCFL47(2023) and CCFL48(2024).
2. CCFL48 reaffirmed the decision to keep up to date the inventory of future work and emerging issues and agreed that Kenya would update the CCFL future work inventory and direction for CCFL (Appendix II of CX/FL 24/48/14), including input from the Circular Letter (CL) and removing items approved as new work.
3. CCFL48 also agreed that the Codex Secretariat would issue a CL requesting Members and Observers to provide new work topics or emerging issues for inclusion in the paper. The Codex Secretariat issued CL 2025/42-FL in May 2025 and remained opened until 15th January 2026.
4. A total of six responses were received from three (3) Member countries: United Republic of Tanzania, Colombia and New Zealand; and three (3) Observer organization: The International Baby Food Action Network (IBFAN), International Chewing Gum Association (ICGA), and The European Federation of the Associations of Dietitians (EFAD).
5. This paper presents the following issues, based on comments raised in response to CL 2025/42-FL:
 - potential work for CCFL.
 - emerging issues of relevance to CCFL.
 - proposals for new work regarding the topics that were previously considered by CCFL; and
 - an inventory table of the potential CCFL future work (Appendix).

POTENTIAL WORK FOR CCFL

6. One potential new work item for CCFL on a definition of the term 'Ultra Processed Foods'(UPF) was raised by the European Federation of the Associations of Dietitians (EFAD) in response to CL 2025/42-FL. EFAD in its general comment informed CCFL that WHO has initiated work toward global guidance on UPF consumption, and US regulators (FDA/USDA) have opened a request for Information to develop a uniform definition of UPF. EFAD further notes that a uniform definition will be important in the implementation of front of pack nutrition labelling.

EMERGING ISSUES OF RELEVANCE TO CCFL

7. No new emerging issues of relevance to CCFL were raised in response to CL 2025/42-FL.

PROPOSALS REGARDING WORK AREAS PREVIOUSLY CONSIDERED BY THE COMMITTEE

8. In response to CL 2025/42-FL, the following proposals for new work and comments were submitted for consideration by CCFL 49.

a) Labelling of alcoholic beverages

9. CCFL48 agreed to keep this project in the inventory for future work until a Member, submits a project proposal. United Republic of Tanzania submitted a discussion paper and project documents for consideration

in CCFL49 (CX/FL 26/49/8 Add.1). Further, The European Federation of the Associations of Dietitians (EFAD) submitted a comment recommending prioritization of a horizontal Codex revision to *General Standard for the Labelling of Pre-packaged Foods* (GSLPF) (CXS 1-1985) and *Guidelines on Nutrition Labelling* (CXG 2-1985) to explicitly cover core, on-package information for alcoholic beverages (alcohol by volume-ABV, standard drink info, energy, allergens, key health warnings), plus claim restrictions in *Guidelines for Use of Nutrition and Health Claims* (CXG 23-1997).

b) Develop a new definition for “small packs/small packaging/small packages”

10. CCFL48 retained this item on the inventory table for possible consideration in the future and ICGA submitted a discussion paper and project document to be considered by CCFL49 (CX/FL 26/49/8 Add.2).

c) Sustainability claims

11. IBFAN and EFAD, supported maintaining this project in the inventory for future works of CCFL as agreed during CCFL48.

RECOMMENDATIONS

12. It is recommended that CCFL49:

- (i) consider and acknowledge the updated future work inventory and emerging issues for CCFL (Appendix)
- (ii) consider the following two new work proposals on:
 - (a) The application of food labelling provisions to alcoholic beverages prepared by Tanzania with assistance of Barbados, Botswana, Eswatini, Ghana, Jamaica, Madagascar, Norway, Saint Lucia, Seychelles, Uganda and World Health Organization (**CX/FL 26/49/8 Add.1**)
 - (b) A guiding definition for a more uniform application of labelling provisions to “small packages” and their related exemptions set in existing Codex texts prepared by the ICGA (**CX/FL 26/49/8 Add.2**); with a view to initiating new work in these two areas.
- (iii) request the Codex Secretariat to issue a Circular Letter (CL) inviting new work proposals or emerging issues; and
- (iv) identify a different delegation to take on responsibility for updating the CCFL future work inventory table, with the following terms of reference among others:
 - a) update the inventory table of CCFL future work (Appendix), including input from the CL and removing items approved as new work; and
 - b) prepare an updated discussion paper on future work and emerging issues for consideration by CCFL50.

APPENDIX**INVENTORY TABLE OF POTENTIAL CCFL FUTURE WORK**

Proposed changes to the table are indicated in **bold and underlined**, while deletions are in ~~strike through~~

S.No.	Issue	Year discussed	Description	Reference
POTENTIAL NEW WORK				
1.	<i>Alcohol Labelling and Guidance</i>	2017, 2023, 2024	<p>For most the consumption of alcohol does not cause significant harm, but for others alcohol can pose harmful health effects. Given one of the primary objectives of the Codex standards is the protection of health, could be useful to take into consideration such concerns into the Codex labelling framework. An example for consideration is the provision of information on labels around alcohol strength and content and the energy content in the product.</p> <p>At the same time, the definition for food in the Procedural Manual covers alcoholic beverages, so the General standard for the labelling of prepackaged foods and related guidelines on nutrition labelling and claims are applicable to all foods including alcoholic beverages.</p> <p>CCFL45 requested the Russian Federation to revise the discussion paper (CX/FL 19/45/10) presented at CCFL45. In CCFL46 no document were issued.</p> <p>Moreover, no discussion paper was prepared for CCFL47 and there were no offers from Members to take the lead on potential new work, the Committee discussed the item and agreed to:</p> <ul style="list-style-type: none"> I. Retain the item on labelling of alcoholic beverage on its Agenda; II. Request the Secretariat to issues a CL on possible future actions by Codex on this matter. III. Request WHO to prepare a discussion paper based on the outcome of the CL. <p><u>In response to CL 2025/24 FL, the United Republic of Tanzania submitted a discussion paper and project document on the application of food labelling provisions to alcoholic beverages for consideration at CCFL49. The main areas of focus for the new work relate to revision of the following texts: CXS 1-1985 – General Standard; CXG 2-1985 – Nutrition labelling and CXG 23-1997 – Nutrition & health claims</u></p>	<p>CX/FL 17/44/9</p> <p>CX/FL 21/46/10 NOT ISSUED</p> <p>CX/FL 23/47/8 NOT PUBLISHED</p> <p><u>CX/FL 24/48/9</u></p> <p><u>CX/FL 26/49/8</u></p>
2.	<i>Review and harmonize the definition of 'small unit'</i>	2023, 2024	<p>The <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985) defines “small unit” as a product with a surface area of less than 10 cm squared. These foods are exempt from mandatory labelling requirements regarding the list of ingredients, lot identification, date marking, storage instructions and instructions for use.</p> <p>It has been noted that exemptions for small units regarding front of pack nutrition labelling and the back of pack nutrient declaration should also be aligned. Within Codex provisions, nutrient</p>	<p>CX/FL 23/47/13</p> <p><u>CX/FL 26/49/8</u></p> <p><u>CX/FL 26/49/8</u> <u>Add.2</u></p>

S.No.	Issue	Year discussed	Description	Reference
			<p>declaration is mandatory for all pre- packaged foods for which a nutrition or health claim is made, but certain foods may be exempted on the basis of small packaging</p> <p><u>In response to CL 2025/24 FL, the observer organization ICGA submitted a discussion paper and a project document on a proposal to develop a new definition for “small packaging/small packages/small pack” and the use of that ‘small pack’ concept to grant exemptions from mandatory nutrition labelling as set already in Section 3.1.2 of the Codex Guidelines on Nutrition Labelling (CXG 2-1985). That proposal for new work does not suggest any change to the current definition of ‘small unit’ nor its related provisions set forth in the GSLPF (CXS 1-1985)”.</u></p>	
<p align="center">PREVIOUS WORK IDENTIFIED BY THE COMMITTEE</p> <p align="center">(no decision to undertake new work)</p>				
3.	<i>Truthful but Misleading Claims Labelling</i>	2001-2004	This work identified a number of types of truthful but misleading claims, such as “cholesterol free” on a potato that would never contain cholesterol. Discussion did not lead to identification of new work items.	CX/FL 17/44/9
4.	<i>Natural</i>	1990-1994, 2010	This work focused on establishing a definition for “natural” and criteria for “minimal processing”. It was noted that the use of these terms was already addressed by provisions in section 5.1 (claims) and the differing meanings of “natural” in various languages was also noted as a problem. In 2010, an observer proposed that the General Guidelines on Claims (CXG 1-1985) be revised to include a definition of natural; however, there was no agreement to new work due to the guidance already provided in section 5.	CX/FL 17/44/9
5.	<i>Vegan and Vegetarian</i>	1997-2000	Proposals were presented for definitions of "Vegan", "Ovo-lacto Vegetarian" and "Lacto Vegetarian", for possible inclusion in either the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), or, as conditional claims, in the General Guidelines on Claims (CXG 1-1979). CCFL agreed to discontinue work in 2000 on Proposed Draft Guidelines for the Use of the Term "Vegetarian" as current differences in the definition and understanding of the term 'vegetarian' from country to country were too wide to allow the development of guidelines at the international level, and it was not possible to establish a common definition. In 2021, the ISO 23662:2021 on 'vegan' and 'vegetarian' was released.	CX/FL 17/44/9
6.	<i>Country of Origin Labelling</i>	2000-2005	Delegates had differing opinions on whether the Codex guidance provided in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) on origin labelling was adequate or not and if there were difficulties in interpretation of the existing provisions. There was no consensus to recommend new work.	CX/FL 17/44/9

S.No.	Issue	Year discussed	Description	Reference
7.	Advertising	1972-1990, 2004-2008	Advertising had been discussed at length over the years, including whether the committee should develop a code of practice for food advertising and whether advertising by the electronic or mass media was under the mandate of CCFL. In 1985, the committee discussed a working paper including legal opinions from FAO and WHO, a summary paper of CCFL's work on advertising, and a proposal for a Code of Practice for Food Advertising. It was recommended that there was no need at that time to continue work on a code of practice for advertising of food. Further discussions occurred from 1987-1989 but no new work was generated. In 2008, a definition of advertising in relation to nutrition and health claims was adopted by the 31st Session of the Codex Alimentarius Commission and included in the <i>Guidelines for the Use of Nutrition and Health Claims</i> (CXG 23-1997).	CX/FL 17/44/9
8.	Use of the terms flavours/ flavourings and other qualifier terms	2017	The issue of use of the terms 'Flavour' and 'Flavouring' was raised owing to inconsistency in the use of terms as laid down in Codex Guidelines on the use of Flavourings and the standards addressing labelling of flavourings. This matter was considered in the CCFA48 which agreed to revise sections 4.1(c) and 5.1(c) of the <i>General Standard for the Labelling of Food Additives when sold as such</i> (CXS 107-1981); and to recommend to CCFL43 to consider the revision of section 4.2.3.4 of the <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985), taking into account the proposed revisions. The issue was discussed in the CCFL44 wherein, it was decided not to make any revisions to the class titles "flavours" and "flavourings" in section 4.2.3.4 as these terms were already included in various national legislations in a number of countries. The Committee also noted that there might be a need to revise the qualifiers "natural", "nature identical", "artificial" as well other related sections in the Standard, i.e. section 5, and agreed that this could be addressed as part of overall improvements of CXS 1-1985	CX/FL 17/44/2-Add.1 REP 18/FL, para. 9
9.	Consumer preference claims	2017	At CCFL43 there was discussion of a proposal to revise the <i>General Guidelines for the use of the term "Halal"</i> (CXG 24-1997). The Committee agreed not to proceed with the revision as proposed but noted that the proposal raised a question on how to deal with consumer preference claims in a broader way. New Zealand suggested that CCFL may want to consider further work on consumer preference claims in this broad sense.	REP 18/FL , para. 52
10.	Class Names and other labelling in guidelines and standards in need of updating	2017	Recognizing that many of the existing CCFL-developed standards and guidelines were developed a number of years ago, it may be worthwhile in the light of new information and trends, to review these texts to determine whether updating and revision is appropriate. Class names, for example, could be reviewed for relevancy by surveying member countries to gauge the degree of consistency of national legislation with the Codex standard. Depending on the outcome, new work could be proposed to promote fair practices in food trade. Similar surveys could be carried out for other elements of the labelling standards and guidelines, such as net contents and drained weight and name and address.	CX/FL 17/44/9

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11.	<i>Contactless Trade of Food</i>	2021	<p>The increased importance of contactless/minimal contact trade of food and the related increase in the importance of e-commerce and internet sales of food during the COVID-19 pandemic and moving forward has been noted.</p> <p>The increase in contactless trade of food could likely increase the adoption and growth of other 'contactless' forms of technology such as 3D printing of food. The information requirements for foods produced in this way may be an area that guidance from CCFL is needed in the future.</p>	CX/FL 21/46/12
12.	<i>Harmonization of criteria for the use of additional health related mentions for specific types of food</i>	2017	<p>The suggestion is to establish general guidelines covering additional health- related mentions, (e.g. "Phenylketonuric, contains phenylalanine" and "high caffeine content, not recommended for use by children, pregnant women breastfeeding or people sensitive to caffeine"), since certain ingredients or other substances or products when used in food production, and still present in the finished product, may cause allergies or intolerances in some people.</p>	CX/FL 17/44/9
13.	<i>Sugar Labelling - Establish a definition for 'added sugars'</i>	2017, 2023, 2024	<p>There has been increasing international attention on added sugars, including recent developments in labelling of added sugars. However, there is no internationally agreed definition for 'added sugars' which leads to difficulties in harmonising labelling standards.</p> <p>Additionally, because "added sugars" are not chemically different to sugars naturally occurring in foods such as fruit and milk, it is difficult to distinguish between added and naturally occurring sugars using analytical methods and so there are considerations with respect to standard methods for analysing added sugar content of foods and beverages and enforcement capabilities.</p> <p>A harmonized definition for "added sugars" would facilitate the interpretation of data to determine the public health significance of such claims and that the current lack of definition may present barriers to CCFL work on harmonising nutrition labelling; and that a harmonized definition could further reduce the risks of misinterpretations which could mislead the consumer.</p> <p>The meeting was also informed that was no need for a definition as CXG 23-1997 already covered claims for the non-addition of sugars; and that flexibility was necessary because "added sugars" regulations for food labelling are different depending on the situation of "added sugars" intake in each country or region and the issue of "added sugars" should be rather be considered within CXG 2-1985. Further, it was noted that no analytical methods to differentiate between "added sugars" and naturally occurring sugars which would make such a definition unenforceable.</p> <p><u>There was no consensus on the scope and purpose of the work and thus the Committee agreed to keep the topic on the inventory of future work, and that Members could bring forward a project document in reply to the CL requesting proposals for new work in the future.</u></p>	<p>CX/FL 17/44/9 CX/FL 23/47/13</p> <p>Discussion paper: CX/FL 24/48/13</p> <p><u>REP24/FL Para 210</u></p>

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14.	<i>Nutrition Labelling / Ingredient Labelling</i>	2017	<p>With the increasing focus on healthy diets, there is continued interest to ensure consumers have all the information they need to make informed decisions.</p> <p>This is particularly the case where there are known health risks associated with high levels of consumption of certain components.</p>	CX/FL 17/44/9
15.	<i>Trans Fatty Acid</i>	2010, 2021, 2023, 2024	<p>The consumption of TFA is strongly associated with increased risk of coronary heart disease (CHD) and related mortality, and any reduction in TFA intake may help decrease CHD risk. CCNFSDU41 agreed to discontinue the work on the condition for a claim for “free” of TFAs and asked CCFL to consider possible actions in CCFL to support trans-fat intake reduction.</p> <p>CCFL47 agreed to defer discussions on trans fatty acids to CCFL48, pending the outcome of the discussions in CCFO28. and reaffirmed that Canada would prepare a discussion paper outlining possible new work on trans fatty acids for consideration by CCFL48.</p> <p><u>CCFO28 did not progress the work on reduction of TFAs intake and returned it to Step 2/3 for redrafting.</u></p>	<p>CX/FL 21/46/12 Appendix I</p> <p>CX/FL 23/47/11 CX/FL 24/48/11</p> <p><u>REP24/FL Para 183</u></p> <p><u>REP26/FO Para 51</u></p>
16.	<i>Sustainability Claims</i>	2021, 2023, 2024	<p>As issues related to the environment and climate change are growing in importance for consumers, there may be a need for CCFL to consider guidance on potential ‘sustainability’ claims that could be made on or about foods.</p> <p>At CCFL47 a discussion paper on sustainability claims was presented (CX/FL 23/47/12). CCFL47 agreed to establish an EWG to revise the discussion paper and project document.</p> <p><u>CCFL48 noted the lack of consensus and agreed not to start new work on sustainability labelling claims and returned the proposed topic to inventory table of previous work identified by the Committee (no decision to undertake new work) noting that the topic was still open for discussion, should a new proposal be elaborated.</u></p>	<p>CX/FL 23/47/12 CX/FL 24/48/12</p> <p><u>REP24/FL, Para 194</u></p>
17.	<i>Criteria for the Definition of "high in" Nutritional Descriptors for Fat, Sugar, and Sodium</i>	2017, 2019, 2024	<p>Currently Codex guidelines only include the "low in" criteria focused on nutritional deficiencies it is suggested that criteria be developed for “high in” fat, sugar, and sodium.</p> <p>High sodium intake can lead to hypertension, a risk factor for cardiovascular disease. High intakes of saturated fat are correlated with increased risk of cardiovascular disease. Excess sugars intake can lead to tooth decay and excess calorie consumption, the latter being a contributing factor to obesity.</p> <p>In 2017, CCFL44 identified criteria for the definition of “high in” nutritional descriptors for fats, sugars and sodium as a subject of possible new work.</p> <p>At CCFL45, the Committee agreed that while the work was valuable, it was premature to consider it at this time and it should await the progress of the work on FOPNL and the discussions in CCNFSDU</p>	<p>CX/FL 17/44/9 REP19/FL, para. 121 FL/45 CRD/16</p> <p><u>REP24/FL, Para 210</u></p>

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			<p>on nutrient profiling. This topic would be retained in the paper on future work and direction for CCFL in order to keep track of the possible need for work at a later stage.</p> <p>At CCNFSDU43, the Committee agreed that past and ongoing work on nutrient profiling by WHO (CRD37) may be sufficient to meet the Committee's needs. The Committee also agreed that due to the lack of support, the proposal on nutrient profiling would not be pursued at this time.</p> <p>Canada, in response to CL 2024/24-FL, suggested that following the above CCNFSDU decision and the completion of the FOPL guidelines, suggested that CCFL48 re-introduce the work to develop guidelines for the use of "High" claims for nutrients of public health concern due to excessive intakes, specifically sodium (salt), saturated fats, and sugars. <u>CCFL48 considered the proposal and noted that there was no support and that should there be interest in the future, the project document could be accompanied by a discussion paper to provide further clarity.</u></p>	
18.	<u>Ultra processed foods</u>	-	<p><u>The European Federation of the Associations of Dietitians (EFAD) has noted the need to develop a definition of the term 'Ultra Processed Foods'(UPF) citing the following initiatives in this regard:</u></p> <ul style="list-style-type: none"> - <u>WHO has initiated work toward global guidance on UPF consumption.</u> - <u>The United States through FDA/USDA has opened a request for Information to develop a uniform definition of UPF.</u> <p><u>EFAD further notes that a uniform definition will be important in the implementation of front of pack nutrition labelling.</u></p>	<u>CX/FL 26/49/8</u>