

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4, 7, 8

FL/46 CRD08

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-sixth Session

Virtual

27 September - October 1 and 7, 2021

Comments from India

Agenda Item 4

CODEX COMMITTEE ON SPICES AND CULINARY HERBS (CCSCH)

Draft Standard for Dried Oregano, Draft Standard for Dried Roots, Rhizomes and Bulbs — Dried or Dehydrated Ginger, Draft Standard for Dried Floral Parts – Dried Cloves and Draft Standard for Dried Leaves - Dried Basil for Adoption, and The Proposed Draft Standard for Dried Seeds – Nutmeg for

Comment: India supports the revised provisions for labelling as forwarded by CCSCH5 for all the above Draft and proposed Draft Standards.

Agenda Item 7

PROPOSED DRAFT GUIDELINES ON INTERNET SALES / E-COMMERCE

1. Recommendations:

i) Review the proposed draft guidance on the food information requirements for pre-packaged foods to be offered via e-commerce (Appendix II) and consider whether it can be advanced to Step 5.

Comments: We support advancing the Proposed Draft Guidance to Step 5.

ii) Review the requirements relating to minimum durability within the draft guidance (Appendix II Section 4 paragraph 3) and consider whether the requirements as given balance the needs of consumers and industry.

Comments: We believe it is important that a minimum durability of the products is ensured in the interest of the consumer. Enough flexibility has been given to the industry for ensuring and providing the minimum durability details by currently drafted text.

iii) Review the proposed alternative wording of sections 4 & 5 (Appendix II, 'Proposed alternative wording of section 4 & 5) drafted by a member of the EWG and consider whether:

(1) the proposed alternative wording is too significant of a departure from the current guidance.

(2) the proposed alternative wording contains information which could be included to make the current guidance more effective.

Comments: We support the proposed alternative text provided for section 4 & 5. We would also like to add the paragraph related to ‘minimum durability’ within the alternative proposed text, as it is not currently included.

iv) Consider whether the issue of cross-border e-Commerce sales is outside the scope of the draft guidance and should be referred to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

Comments: We consider the issue of cross border e-commerce sales should be referred to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS).

v) Reconvene the EWG, chaired by the United Kingdom and co-chaired by Japan, Chile, India and Ghana to continue development of the Guidance.

We agree with the recommendation.

2. Appendix II: Proposed Draft Guidance on the Food Information Requirements for Prepackaged Foods to be offered via e-commerce

Comment: The term “product information e-page” has been defined, however at several places “product information page” is used, for example-under the definition of “food information” and at various places under Section 4. We believe that same terminology shall be used throughout the document.

Agenda Item 8

Appendix II: PROPOSED DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO ALLERGEN LABELLING

We agree with the Proposed draft revisions given in Appendix I wrt Allergen Labelling.

Specific comment

Section 8: Presentation of mandatory information

Comment: We suggest merging sections 8.3.1 and its sub-section 8.3.1.1, as there seems to be repetition in the text and 8.3.1 does not include any other sub-section. Proposed new wording is as follows:

“The foods and ingredients listed in section 4.2.1.4 shall be declared so as to contrast distinctly from surrounding text. The font type, minimum font size, style, colour as well as the use of upper and lower case letters should be considered by competent authorities to ensure legibility of declarations about foods and ingredients known to cause hypersensitivity.

Appendix III: PROPOSED DRAFT GUIDELINES FOR THE USE OF [PRECAUTIONARY ALLERGEN OR ADVISORY LABELLING]

1. Title of the Guidelines

Comment: We support the title as “Precautionary Allergen Labelling”

2. Scope

2.1

Comment: We propose to revise the text as below to align it with the proposed definition of precautionary allergen labelling:

These guidelines apply to PAL when used to indicate the possible unintentional presence of allergens **during the production, manufacture and transport of food due to** cross-contact in pre-packaged foods that are within the scope of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985)

2.2

Comment: We propose to revise the text to align it with the purpose, as below:

The Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) provides guidance on effective management practices and controls to prevent or minimise the ~~potential for allergen cross-contact~~ **unintentional presence of allergens in food due to cross-contact**

3. Definitions

Comment: We propose to revise the text as below:

Precautionary allergen labelling is a statement indicating the allergen(s) that may be **unintentionally** present in a food due to allergen cross-contact during the production, manufacture and transport of food, which may occur despite implementing allergen management practices and controls such as in the Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020).

4. General Principles

Comment: We believe that the Committee shall await the assessment and recommendations of the FAO/WHO expert panel, before recommending Principles related to quantitative risk assessment and reference doses.

We recommend that the text be placed in square brackets and considered once the Committee has received the advice of the expert panel.