

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4 c)

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD LABELLING
Thirty-seventh Session
Calgary, Canada, 4 - 8 May 2009**

**DISCUSSION PAPER ON CRITERIA OR PRINCIPLES FOR LEGIBILITY AND
READABILITY OF NUTRITION LABELLING**

**Electronic Working Group on Development of Criteria/Principles for Legibility and Readability of
Nutrition Labelling**

Governments and international organizations wishing to submit comments on the following subject matter are invited to do so **no later than 6 April 2009** to: Mr. Ron Burke, Director Bureau of Food Regulatory, International and Interagency Affairs, Health Products and Food Branch, Health Canada, Bldg No. 7, Room 2395, Tunney's Pasture, Ottawa K1A 0L2, Canada, E-mail: codex_canada@hc-sc.gc.ca, with a copy to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, Via delle Terme di Caracalla, 00153 Rome, Italy, E-mail: codex@fao.org.

I. BACKGROUND

1. At the 36th Session of the Codex Committee on Food Labelling (CCFL), the Committee, taking into consideration the recommendations in the WHO Global Strategy on Diet, Physical Activity and Health (the Global Strategy), agreed to undertake new work on proposed amendments to the Guidelines on Nutrition Labelling regarding the (1) list of nutrients and (2) legibility and readability of information.
2. With respect to the work on legibility and readability of nutrition information, as noted in Appendix VIII, ALINORM 08/31//22, the overall purpose and the scope of the work is to develop general criteria or principles to be included in the Guidelines on Nutrition Labelling that would be applicable to both mandatory and voluntary nutrition labelling to enhance the legibility and readability of the information. In developing this work, the Committee recognized that universal symbols or simplified labelling is not a part of the scope or mandate of this work.

3. In order to develop the proposed amendments, the Committee agreed to convene a physical Working Group immediately prior to the 37th Session of CCFL. The Committee also agreed to establish an electronic Working Group (eWG), led by the Delegation of the United States, to develop a discussion paper on the development of criteria or principles for legibility and readability of nutrition labels to facilitate discussion at the physical Working Group.
4. The overall task of this eWG was to develop a discussion paper on criteria or principles that would be applicable to both mandatory and voluntary nutrition labelling to enhance the legibility and readability of the information. The paper is intended to facilitate discussion at the physical Working Group to be held immediately prior to the 37th CCFL Session.
5. An invitation to participate in the eWG was sent to all Codex members in July 2008. Twenty-one countries (Australia, Barbados, Brazil, Canada, Chile, Costa Rica, European Community, France, Germany, Guatemala, Iran, Japan, Malawi, Mali, Mexico, Federated States of Micronesia, New Zealand, Poland, Spain, Switzerland, and United Kingdom) and eight non-governmental organizations (Brazilian Association of Food Industries, Confederation of the Food and Drink Industries of the EU, Fédération internationale des vins et spiritueux (FIVS), International Alliance of Dietary/Food Supplement Associations, International Council of Beverages Associations (ICBA), International Council of Grocery Manufacturer Associations, International Dairy Federation (IDF), Institute of Food Technologists, International Special Dietary Foods Industry (ISDI)) expressed interest in participating in this eWG.
6. In September 2008, a background paper that identified relevant guidance in existing Codex labelling texts and presented key issues and questions for comment was circulated to eWG members. Twelve countries (Australia, Barbados, Brazil, Canada Chile, Costa Rica, European Community, Guatemala, Malawi, New Zealand, Poland, and Switzerland) and four non-governmental organizations (FIVS, ICBA, IDF, and ISDI) provided comments on the issues and questions presented in the background paper.
7. In January 2009, a draft discussion paper that discussed comments received from eWG members and presented proposed criteria and principles (based on comments received) was circulated for further comment. Eight countries (Australia, Barbados, Brazil, European Community, Mexico, New Zealand, Poland, and Switzerland) and three non-governmental organizations (ICBA, IDF, and ISDI) provided comments on the proposed criteria and principles that were presented in the draft discussion paper.
8. This final discussion paper was prepared taking into account all comments received from eWG members.
9. A discussion of issues and questions considered by the eWG and general principles and specific criteria for presentation of nutrition information proposed by eWG members, taking into account existing guidance in Codex labelling texts, are presented below.

II. DISCUSSION OF ISSUES AND COMMENTS RECEIVED FROM EWG MEMBERS

10. Existing Codex labelling texts provide some guidance to ensure consumer understanding of information, including nutrition information presented on food labels. Section 8 of the Codex General Standard for the Labelling of Prepackaged Foods (*CODEX STAN 1-1985 (Rev. 1-1991)*) (GSLPF) and Section 3.4 of the Codex Guidelines on Nutrition Labelling (*CAC/GL 2-1985 (Rev. 1-1993)*) include provisions related to presentation of labelling information.

11. In light of these existing Codex provisions, eWG members considered the following issues: 1) general criteria or principles that include sufficient flexibility for national governments to develop specific criteria, as needed and relevant for their consumers; 2) specific elements related to presentation such as format, order and/or grouping of nutrients declared, prominence and clarity, language, numerical declaration of nutrient content, and linking nutrient information to relevant dietary guidance; and 3) special provisions or exemptions considering labelling constraints such as the size and shape of food packages.
12. Overall, eWG members were supportive of the work and development of criteria or principles for the legibility and readability of nutrition labelling. However, there was some concern expressed about the inherent element of “understanding and interpretation” that influences readability. It was stated that consumer research on the effectiveness of nutrition labelling in influencing behaviors and purchasing decisions is important and should be considered in developing specific recommendations. In this regard, the importance of consumer research was stressed to understand how consumers perceive (or read) label information and what makes the information comprehensible and ready for consumers to interpret and understand. It was stated that costs and benefits should also be considered.
13. It was further noted that only “legibility” should be used for the purposes of this eWG to avoid confusion and better define the work because “readability” of nutrition information, i.e., the information being interesting or understandable is subjective and dependent on the reader and consumer education measures, which are beyond the scope of CCFL.
14. Members also stated that criteria or principles for legibility and readability of nutrition labelling developed by this eWG should not take precedence over specific guidance provided in existing Codex standards, such as the standards infant formulas and foods for special dietary uses. It was suggested that existing section 3.2.7 of the Guidelines on Nutrition Labelling should be incorporated within the criteria/principles developed by this eWG. In this respect, there may be a need to consider and clarify the scope of the proposed work, particularly with respect to their applicability to infant formulas and foods for special dietary uses.
15. **General Criteria for Global Applicability** – It was recalled that the 36th CCFL physical working group and Plenary Session discussed the issue of feasibility of developing general criteria that could apply on a global basis to assure the legibility of nutrient declaration. Several countries had expressed that it is important to ensure that any CCFL criteria or principles for nutrition labelling include sufficient flexibility for national governments to develop specific criteria, as needed and relevant for their consumers. A prescriptive, standardized format at the international level may not ensure consumer understanding and use globally. However, it may be relevant for CCFL to recognize the importance of legibility and readability and develop general criteria or principles that can assist national governments to determine a simple and uncluttered format in which the nutrition information is readily observed and comprehended by consumers.
16. In this respect, eWG members considered existing Codex guidance to determine whether and what additional general principles are needed to ensure the legibility and readability of nutrition labelling. Specifically, eWG members considered whether sections 8.1 and 8.2 of the GSLPF should be applied to nutrition labelling when it is presented on a food label, regardless of whether nutrition labelling is mandatory or voluntary.
17. All e-WG members supported applying 8.1.2 and 8.2 of the GSLPF to nutrition labelling, regardless of whether it is voluntary or mandatory. Members noted that these principles will ensure that consumers have access to information about the nutritional quality of the food and will assist them in

making informed choices about the food. Members also pointed out that sections 8.1.1 and 8.1.3 of the GSLPF should be applied as they are relevant to all labelling information.

18. Some members agreed that section 8.1.4 of the GSLPF (which refers to name and net contents) should be applied to nutrition labelling in that nutrition information should be provided in a prominent position and that all required nutrition information should be presented in the same field of vision. Several other members, however, expressed concern with its application to nutrition labelling. In particular, members noted that use of multiple language requirements, package sizes, etc. would preclude the application of 8.1.4 to nutrition labelling and that placement of nutrition information in an appropriate “prominent position” should be left to national authorities.
19. Members considered any additional general criteria or principles, in light of existing guidance, that may be necessary to enhance the legibility and readability of nutrition labelling.
20. A few members noted that no additional general criteria or principles are necessary and that existing criteria specified in section 8.1 and 8.2 of the GSLPF should be applied. Others noted that some principles that ensure the legibility and readability should be considered, such as (1) Nutrition labelling must provide the consumer with information about the nutrients type and quantity in a food. The information must be presented in a standard fashion and according to regulations; (2) Nutrition labelling should become a real tool in consumers’ purchasing decisions as well as serve as an education tool used by health professionals; and (3) Nutrition labelling should facilitate the implementation of nutrition education campaigns by national authorities.
21. Members also considered specific provisions that may be necessary to ensure that any Codex criteria or principles that are developed do not impede global application and use.
22. Members stated that global application of criteria for legibility and readability of nutrition labelling should take into account different approaches and practical issues at the national level. Therefore, members stated that it is important to describe the criteria and principles in broad and general terms and provide flexibility to allow national authorities to adopt nutrition labelling presentation based on the needs of their consumers. It was suggested that while a unique standardized nutrition labelling format at the international level might not be possible, work should focus on basic standardization criteria such as format, level of contrast, order of nutrients, and font size. To facilitate global applicability and use, some members stated that NRVs should be developed, definitions of nutrients should be harmonized and made uniform, and analytical methods for testing nutrients should be practical and suitable for use in developing countries.
23. **Specific Elements Related to Presentation** – In the development of general criteria or principles, an important consideration relates to the need for and appropriateness of specific elements that enhance the legibility and readability of nutrition labelling. Such specific elements may include format, order and/or grouping of nutrients declared, prominence and clarity, language, numerical declaration of nutrient content, and linking nutrient information to relevant dietary guidance.
24. In this respect, eWG members considered the need for criteria related to specific elements of presentation that would ensure legibility and readability of nutrition labelling.
25. Several members stated that the general principles in the GSLPF and the Guidelines on Nutrition Labelling provide important basic principles for the presentation of information on the label, but additional guidance would assist to ensure legibility and readability of information. One member provided examples of nutrition declaration demonstrating varying degrees of legibility and readability. Members suggested that only really relevant information should be included so as to avoid label clutter and excessive information on the label. Members suggested consideration of the

following specific elements: format, order/grouping of nutrients, prominence and clarity, language, and numerical declaration of nutrient content.

26. However, a few members stated that consideration of specific elements may not be necessary given existing guidance in the GSLPF and Guidelines on Nutrition Labelling and that a broad principle such as to facilitate understanding of nutrition information and provide nutrition education to consumers may be sufficient. It was suggested that existing principles could be strengthened by having some additional simple criteria, such as font size, to enhance legibility. It was expressed that consideration of specific elements of presentation should be left to national authorities so that criteria or principles related to specific elements can be developed to reflect consumer understanding and national health policy.
27. Members also considered criteria or principles that are appropriate for each of the specific elements to ensure legibility and readability of nutrition labelling.
28. With respect to format, members noted that a clear format should be established to enhance the legibility and readability of nutrition labelling. Several members favored tabular declaration as it is likely to be more prominent, improves readability, provides easy access to information, and facilitates product comparison. Alignment of numbers and adequate space between lines were also suggested for consideration. Members also recommended that a linear format should be permitted on small packages with insufficient space for a tabular format.
29. With respect to the order of nutrients, members stated that a uniform order or grouping of nutrients enhances access of information and facilitates comparison of products. The order should take into account the list of nutrients for mandatory declaration that is being considered by the eWG led by NZ. It was suggested that the nutrients could be presented in the order of relevance to the Global Strategy. Referring to section 3.2.7 of the Guidelines on Nutrition Labelling, some members proposed that nutrient order and numerical declaration provisions considered here should not take precedence over requirements established in existing Codex standards. At least one member noted that the specific order of nutrients should be determined at the national level.
30. With respect to prominence and clarity, members stated that a font that ensures prominence, visibility, and clarity should be specified. Members suggested various minimum font sizes and recommended dark colored print and significant contrast between text and background. Members also stated that nutrition information should be clearly visible, not easily erased, not easily deteriorated or easy to fall or separate from the container and that global application should be considered. It was commented that while font is one of the important aspects of legibility, it is necessary to carefully consider how a minimum font size is defined to reduce the risk of misinterpretation of such a requirement. A few members, however, stated that font size requirements should be determined at the national level.
31. With respect to language, members stated that the language of nutrient declaration should be according to national legislation in the country of sale. One member noted that alternatives that do not require multiple languages should be considered to avoid label clutter and consumer fatigue. It was also suggested that global application should be considered.
32. With respect to numerical declaration, members stated that the declaration of nutrient content should be consistent with existing **section 3.4** of the Codex Guidelines on Nutrition Labelling, including:
 - For energy,
 - kJ/kcal per 100 g or 100 mL for packages with more than one serving
 - kJ/kcal per serving/portion, provided information on serving/portion is provided
 - kJ/kcal per package for single serving packages
 - For macronutrients,

- g per 100 g or 100 mL for packages with more than one serving
 - g per serving/portion, provided information on serving/portion is provided
 - g per package for single serving packages
 - For minerals and vitamins,
 - Metric units/% of NRV per 100 g or 100 mL for packages with more than one serving
 - Metric units/% of NRV, per serving/portion provided information on serving/portion is provided
 - Metric units/% of NRV per package for single serving packages
33. Members disagreed on whether vitamins and minerals should be presented in metric units or as percentage of reference intakes. Some noted that declaration as percentage of reference intake should be required, in addition to the amount in metric units per 100 g or 100 mL, for each nutrient because declaration of nutrient content in absolute amounts has limited use to consumers and providing the information as a percentage of reference intakes can enhance consumer understanding of the information. Others recommended that vitamins and minerals should be expressed as metric units and their declaration as a percentage of reference intakes should be an additional voluntary measure, given that globally agreed NRVs are lacking.
34. Members also noted that it is important to link nutrient information to relevant dietary guidance, but that this issue should be addressed at the national level as dietary guidelines differ across countries and national authorities can determine as necessary for their populations. It was further noted that this issue is outside the scope of this working group as it does not directly relate to legibility and readability of the information and that section 8 of Guidelines for Use of Nutrition and Health Claims already includes a provision related to this aspect.
35. Members also proposed other specific elements related to presentation such as print style, case, contrast, spacing, and alignment. It was suggested that limitations as to what can be included in the nutrient declaration table should be considered and that outside of the nutrients that are to be declared in the table, only nutrients for which a claim is made should be included, but other substances or ingredients should not be declared in the nutrient declaration table. It was also recommended that there may be a need to consider other elements such as rounding of numbers, units of measure (should be internationally accepted), use of terminology (salt vs. sodium), and unit quantity (per serving or per portion). Members provided various recommendations for rounding of numbers. It was also suggested that where food should be reconstituted with water before consumption, nutrition information should relate to the proportion of the food as so reconstituted. Similarly, where the food is labeled with directions that it should be drained before consumption, label should clearly indicate that nutrition information relates to the drained food.
36. **Special Provisions and/or Exemptions** – As criteria or principles are developed for the legibility and readability of nutrition labelling, another issue that is important to consider is the need for and appropriateness of special provisions or exemptions to incorporate flexibility and accommodate different labelling constraints.
37. In this respect, eWG members considered whether there is a need for special provisions or exemptions in the development of criteria or principles so as to retain flexibility and accommodate certain labelling constraints.
38. Several members agreed that there is a need to consider special provisions or exemptions in the development of criteria or principles so as to retain flexibility and accommodate labelling constraints. Recommendations included (1) special provisions for refillable glass bottles – permit nutrition information to be provided by alternate means; (2) exemptions for certain foods/beverages, provided no health or nutrition claim is made; for example, foods with no or minimal nutritional content and

foods that do not form a significant part of a balanced diet; (3) consistent with GSLPF, use of additional labels or stickers for translation of information contained in the original label; and (4) infant formula should not be included in the scope of this work.

39. Several members stated that there is a need to consider special provisions for small packages and that “small packages” should be defined. Suggestions for this definition included a surface area smaller than 100 cm² and largest surface area of less than 25 cm². Recommendations for special provisions included: (1) exempt small packages from nutrition labelling, but only when no health or nutrition claim is made. If a health or nutrition claim is made, product should not be exempted from nutrition labelling declaration; (2) require a shortened, minimum set of nutrients to be declared; (3) allow nutrition labelling to be declared in a linear format. Other suggestions included permitting the label to refer to a site or phone number where consumers can obtain nutrition information and requiring nutrition information to be provided on or in connection with the display of the food or provided to the purchaser upon request. It was suggested that packages that are too small for all mandatory information to be declared should be wrapped in a bigger package where the necessary surface area is available for all mandatory declarations and that shape or size cannot be used as a way to avoid mandatory declarations.
40. Members agreed that special provisions should be considered for packages with shapes such that a label cannot be affixed. Members stated that the use of tags is appropriate but there is a need ensure that tags are affixed for the life of the product and do not easily fall off or separate from the container. Alternatively, for such packages, nutrition information could be provided on or in connection with the display of the food or provided to the purchaser upon request.

III. RECOMMENDATIONS AND NEXT STEPS

41. Overall, eWG members expressed support for the development of general criteria and principles for the legibility and readability of nutrition labelling. Members particularly stressed the need to describe principles and criteria in broad, general terms and provide sufficient flexibility for governments to apply additional specific criteria as needed in their national context. Taking into account existing provisions in section 8 of the GSLPF and section 3.4 of the Guidelines on Nutrition Labelling, members recommended several general principles and specific criteria for elements of presentation to ensure legibility and readability of nutrition information on food labels. These proposed general principles and criteria are presented in Annex 1 of this discussion paper.
42. It is recommended that the proposed principles and criteria listed in Annex 1 be considered by the physical working group to be held prior to the 37th CCFL. It is further recommended that these proposed principles and criteria be considered to amend existing Section 3.4 of the Codex Guidelines on Nutrition Labelling¹.

¹ If Annex 1 is considered to amend Section 3.4 of the Guidelines on Nutrition Labelling, it is important to note that the Nutrient Reference Values (NRVs) provided in existing section 3.4 should be retained. NRVs were not discussed by this eWG as it is beyond the scope of work of this eWG.

ANNEX 1

RECOMMENDATIONS FOR PRINCIPLES AND CRITERIA

Taking into account existing provisions in section 8 of the GSLPF and section 3.4 of the Guidelines on Nutrition Labelling, eWG members recommended the following general principles and specific criteria for elements of presentation, as applicable to both mandatory and voluntary nutrition labelling, to enhance the legibility and readability of the information.

At the end of each recommended principle/criterion, a note is made as to whether the principle/criterion is a new provision (new) or taken from existing provisions in Codex labelling texts, applied as is (existing) or with recommended modifications (existing, modified).

GENERAL PRINCIPLES

- (1) Nutrition labelling shall be applied in such a manner that it will not become separated from the container. (EXISTING – SECTION 8.1.1 OF THE GSLPF)
- (2) Nutrition labelling shall be clear, prominent, indelible, and readily legible by the consumer under normal conditions of purchase and use. (EXISTING – SECTION 8.1.2 OF THE GSLPF)
- (3) Where the container is covered by a wrapper, the wrapper shall carry the nutrition labelling or the existing nutrition labelling on the inner container shall either be readily legible through the outer wrapper or not be obscured by the outer wrapper. (EXISTING – SECTION 8.1.3 OF THE GSLPF)
- (4) If the language on the original nutrition label is not acceptable to [or not in a language that is understood by/under national legislation in the country of sale for] the consumer for whom it is intended, a supplementary nutrition label containing the information in the required language may be used instead of relabelling. In the case of either relabelling or a supplementary nutrition label, the information provided shall fully and accurately reflect that in the original nutrition label. (EXISTING, MODIFIED – SECTION 8.2 OF THE GSLPF)

SPECIFIC ELEMENTS OF PRESENTATION

- (5) These recommendations related to specific elements of presentation are intended to facilitate and enhance the legibility and readability of nutrition labelling. However, national authorities may determine any additional alternate means of nutrition presentation taking into account approaches and practical issues at the national level and based on the needs of their consumers. (NEW)
- (6) Format – Nutrient content should be declared in a numerical, tabular format. Consideration may be given to an outline or border around the nutrient declaration to enhance prominence. Alignment of numbers may also be considered. Where there is insufficient space for a tabular format, nutrient declaration may be presented in a linear format. (NEW)
- (7) Order (NEW) –
 - (i) Nutrients should be declared in the following order:
 - Energy
 - Total Fat
 - Sub-group declaration, as appropriate
 - Sub-group nutrients for which a nutrition or health claim is made
 - Carbohydrate

Sub-group declaration, as appropriate
 Sub-group nutrients for which a nutrition or health claim is made

Protein
 Any other nutrient for which a nutrition or health claim is made
 Any other mandatory nutrients (minerals, vitamins)

NOTE: THE ORDER/GROUPING OF NUTRIENTS IS TO BE DISCUSSED FURTHER AND DETERMINED TAKING INTO ACCOUNT THE CONCLUSIONS OF THE E-WG ON MANDATORY NUTRIENTS.

- (8) Font – A font type size of at least X mm [TO BE DETERMINED] should be used. A significant contrast should be maintained between the text and background so as to be clearly visible. (NEW)
- (9) Language – The language of nutrient declaration should be according to national legislation in the country of sale. See also (4) above. (NEW)
- (10) Numerical declaration –
- (i) Energy – Energy should be expressed in kJ and/or kcal rounded to X [TO BE DETERMINED] per 100 g (or per 100 mL). In addition, this information may be given per serving as quantified on the label or per portion provided the number of portions contained in the package is stated. (EXISTING, MODIFIED – SECTION 3.4 OF THE GUIDELINES ON NUTRITION LABELLING)
 - (ii) Protein, Carbohydrate, and Fat – Protein, carbohydrate, and fat (and their sub-group nutrients) should be expressed in g rounded to X [TO BE DETERMINED] per 100 g (or per 100 mL). In addition, this information may be given per serving as quantified on the label or per portion provided the number of portions contained in the package is stated. Protein content may also be expressed as a percentage of Nutrient Reference Value. (EXISTING, MODIFIED – SECTION 3.4 OF THE GUIDELINES ON NUTRITION LABELLING)
 - (iii) Vitamins and Minerals – Vitamins and minerals should be expressed in metric units and/or as a percentage of Nutrient Reference Value rounded to X [TO BE DETERMINED] per 100 g (or per 100 mL). In addition, this information may be given per serving as quantified on the label or per portion provided the number of portions contained in the package is stated. (EXISTING, MODIFIED – SECTION 3.4 OF THE GUIDELINES ON NUTRITION LABELLING)
 - (iv) If the package contains only a single serving/portion, nutrient values [should/may] be declared on a per package basis. (EXISTING, MODIFIED – SECTION 3.4 OF THE GUIDELINES ON NUTRITION LABELLING)
 - (v) In countries where serving sizes are normally used, the information required by this section may be given per serving only as quantified on the label or per portion provided that the number of portions contained in the package is stated. (EXISTING – SECTION 3.4 OF THE GUIDELINES ON NUTRITION LABELLING)

EXEMPTIONS AND SPECIAL PROVISIONS (NEW)

- (11) Small packages may be exempt from nutrient declaration, provided no nutrition or health claim is made in the labelling of that food. Small packages are defined as packages with a largest surface of less than XX cm² [TO BE DETERMINED].

NOTE: THIS PROVISION IS TO BE CONSIDERED IN CONJUNCTION WITH THE WORK OF THE E-WG ON LIST OF MANDATORY NUTRIENTS.

(12) To accommodate nutrition labelling of small packages, national authorities may also consider the declaration of a shortened, minimum set of key nutrients.

NOTE: THIS PROVISION IS TO BE CONSIDERED IN CONJUNCTION WITH THE WORK OF THE E-WG ON LIST OF MANDATORY NUTRIENTS.

OTHER PROVISIONS FOR CONSIDERATION

The following are additional provisions that were recommended by some eWG members, but for which there was no broad agreement and, therefore, are presented here for further consideration:

- (1) Nutrition labelling shall appear in a prominent position and all of the required nutrient contents shall appear in the same field of vision. (EXISTING, MODIFIED – SECTION 8.1.4 OF THE GSLPF)
- (2) The contents of only those nutrients that are listed in section 7(i) may be declared within the nutrition table. Other substances or ingredients should not be declared within the nutrition table. (NEW)
- (3) In the case where a product is subject to labelling requirements of a Codex Standard, the provisions for nutrient declaration set out in that Standard should take precedence. (EXISTING, MODIFIED – SECTION 3.2.7 OF THE GUIDELINES ON NUTRITION LABELLING)
- (4) Where the amount is considered to be insignificant, there should be a possibility to declare the value as “0” or “traces” or “as defined at the national level” or to exempt from nutrition labelling. (NEW)
- (5) Where a food should be reconstituted with water before consumption, nutrient content [should/may] relate to the proportion of the food as so reconstituted. Similarly, where the food is labeled with directions that it should be drained before consumption, the label [should/may] indicate that nutrient content relates to the drained food. (NEW)
- (6) With respect to small packages, consideration may be given to allowing the label to provide a website or phone number where consumers can obtain the nutrition information, or requiring that nutrition information be provided on or in connection with the display of the food or provided to the purchaser upon request. (NEW)
- (7) Alternate means of presentation of nutrition information may be considered for refillable glass containers. (NEW)
- (8) Packages with shapes such that a label cannot be affixed may provide nutrition labelling through the use of tags, provided the tags are affixed for the life of the product and do not easily fall off or separate from the container. (NEW)