

# codex alimentarius commission



FOOD AND AGRICULTURE  
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**AGENDA ITEM NO. 4(C)**

**CX/FL 10/38/8-ADD.1**

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON FOOD LABELLING  
THIRTY-EIGHTH SESSION  
QUEBEC CITY, CANADA, MAY 3 - 7, 2010**

**PROPOSED DRAFT CRITERIA/PRINCIPLES FOR LEGIBILITY AND  
READABILITY OF NUTRITION LABELS**

**GOVERNMENT COMMENTS**

**COMMENTS FROM:**

**CANADA**

## **PROPOSED DRAFT CRITERIA/PRINCIPLES FOR LEGIBILITY AND READABILITY OF NUTRITION LABELS**

### **GOVERNMENT COMMENTS**

#### **CANADA:**

Canada would like to thank the United States for their work in developing the proposed draft criteria and principles for legibility of nutrition labelling. Canada supports the work to amend the standards to include provisions for legibility as this will assist consumers' access to the information to make informed purchasing decisions. Canada would like to offer the following comments for consideration.

Currently the discussion paper recommends in paragraph 46 of CX/FL 10/38/8 that the proposed text should go in a new section 4 of the *Guidelines on Nutrition Labelling* (CAC /GL 2-1985). Section 3 currently outlines nutrient declaration and section 4 supplementary nutrition information. If the legibility provisions are meant to cover both, consideration should be made to having them follow section 4. If they are only for section 3, then placement after section 3 in a new section 4 is appropriate. It is unclear from the text of the discussion paper if both nutrient declaration and supplementary nutrition information are meant to be covered by the criteria and principles.

Comments on Redrafted Text on Principles and Criteria for Legibility of Nutrition Labelling (Annex 1). Overall we support the Principles and Criteria, we have a few minor comments to add that may improve the text, should we go through a line by line review:

- new provision 1: The last sentence in this provision refers to "supplementary nutrition labels". We believe it should be modified to "supplementary nutrition information" as per definition in guideline 2.2. We need to be consistent with the definitions specified at the beginning of the guidelines. There may be other instances where this is not the case.
- new provision 9: we suggest adding in other possible ways to deal with small packages such as: "or alternative means of providing the information, such as tags, website, or telephone number...". We also suggest adding after the first comma, "particularly when the nutrient declaration must be provided because a nutrition or health claim is made in the labelling of that food,..."
- provision 8: we suggest moving this provision after the new provision 9, modified as suggested, and further modify it as follows "Small packages may also be exempt from requirements regarding minimum font to allow nutrient declaration particularly in cases where nutrition or health claim is made in the labelling of that food." Total exemption would only be required in the case of mandatory nutrition labelling and should only be discussed if we were moving in this direction. It is not necessary to exempt something that is voluntary.

#### **Need to Retain Items for Further Discussion by the Committee:**

Paragraph 47 of CX/FL 10/38/8 indicates:

47. Finally, the eWG recommends that CCFL further consider the provisions on (a) nutrition labelling of small packages (provisions 11 and 12); (b) declaration of insignificant amounts of nutrients (bullet point 3); and (c) presentation of nutrient content where foods are reconstituted or drained before consumption (bullet point 4), in the context of other broader issues related to nutrition labelling. We ask the Committee to refer these provisions to be considered under the umbrella of ongoing work on the list of nutrients that are always declared and issues related to mandatory nutrition labelling.

Canada would like to underscore the importance of the consideration of other issues that were deleted from the principles on legibility, but which still need to be considered as part of the broader issues related to nutrition labelling. Canada proposes that these issues be brought forward once the Committee reaches a decision on whether or not to proceed with mandatory nutrition labelling. Some issues may only be relevant to mandatory nutrition labelling, however, other issues were identified that are relevant to both mandatory and voluntary nutrition labelling. Canada considers that the Committee should not lose sight of these issues and should retain them for further consideration as part of other work.