

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

AGENDA ITEM NO. 9

CX/FL 09/37/13-ADD.1

E

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-SEVENTH SESSION
CALGARY, CANADA, MAY 4 - 8, 2009**

DISCUSSION PAPER ON MODIFIED STANDARDIZED COMMON NAMES

COMMENTS FROM:

**CANADA
INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN)**

DISCUSSION PAPER ON MODIFIED STANDARDIZED COMMON NAMES

CANADA:

The *Draft Action Plan for the Implementation of the Global Strategy on Diet, Physical Activity, and Health*, prepared by WHO and FAO (CL 2006/44-CAC) identifies as a proposed action the amendment of the *Codex General Standard for the Labelling of Prepackaged Foods (GSLPF)* to permit the use of the names established in a standard to be used in conjunction with either a comparative claim or a nutrient content claim on the label of a modified standardized food, provided that the claims comply with requirements set out in the *Codex Guidelines for Use of Nutrition and Health Claims*.

The discussion paper provides the basis for further development of the conditions for the use of modified standardized names for foods with modifications from a compositional standard for the purpose of a nutrition claim. Canada believes that an amendment to Section 4.1 (Name of the Food) in the GSLPF would contribute to protecting the health of consumers, ensuring fair practices in food trade, and furthering the implementation of the Global Strategy.

Canada supports a recommendation for new work in this area.

INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN):

IBFAN does not support the new work proposed to modify standardized names for the purpose of incorporating nutrition claims into a modified name to reflect a change in the composition of a food.

IBFAN recommends the termination of this discussion paper for the following reasons:

1. This will create a plethora of commercial food products that will be promoted as being new and improved without the required scientific evidence that these will provide health benefits. The rejigging of nutrition claims into food names will create more confusion for consumers without evidence that this will improve public nutrition.
2. The potential for misleading the consumer is greatly increased by this proposed manipulation of food names. IBFAN recommends that for consumers to be fully informed about any differences in ingredients between food products is to provide Quantitative Ingredient Declaration (QUID. QUID labelling enables consumers to be informed about ingredients such as: added sugars; quantity of fish in products such as fish sticks; amounts of fruit juice in products such as fruit drinks, etc..
3. The proposed modifications in the tables can easily be integrated into labelling according to % by weight or volume of key ingredients for easy comparisons by consumers. Percentages by weight or volume of key ingredients can be listed on the front panel to quickly and easily enable consumers to make optimal food product decisions.
4. Attempts to manipulate food names for the purpose of marketing are not in the interest of consumers and a waste of resources.