

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-sixth Session

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PROPOSED DRAFT GUIDELINES ON FRONT-OF-PACK NUTRITION LABELLING

(Comments from Algeria, Paraguay, Republic of Korea, Russian Federation, IACFO, WPHNA)

Algeria

Questions (Annexe II du document CX/FL 21/46/6)	Réponses
1- Confirmez-vous la préférence de la majorité du Comité de supprimer la section 5 et d'intégrer les aspects pertinents de la section 5 à la section 4 ?	Oui
2- Convenez-vous que le libellé proposé pour le principe 4.3.1 gère le potentiel de conflit d'intérêts dans le développement d'un système d'ÉNF ?	- le libellé proposé pour le principe 4.3.1 ne gère pas un conflit d'intérêts dans le développement d'un système d'ÉNF à condition d'ajouter à ce principe la phrase suivante : « la mise en œuvre de l'ÉNF reviendra en dernier lieu à l'autorité compétente du gouvernement ».
3- Convenez-vous que le changement d'orientation du principe 4.3.2 vise à faciliter l'utilisation de l'ÉNF par les consommateurs ?	Oui
4- Compte tenu des modifications proposées aux principes, êtes-vous d'accord avec la suppression des groupes de principes ?	- la partie dédiée aux groupes de principes doit être synthétisée en insistant sur les principes essentiels et en supprimant les sous-titres.
Laquelle des solutions suivantes préférez-vous pour le placement des Directives sur l'ÉNF : <ul style="list-style-type: none">• intégrées à la section 5 des Directives concernant l'étiquetage nutritionnel (CXG 2-1985) ;• en tant qu'annexe à la section 5 « information nutritionnelle supplémentaire » des Directives concernant l'étiquetage nutritionnel (CXG 2 – 1985) ;• document autonome.	Intégrées en tant qu'annexe à la section 5 des Directives concernant l'étiquetage nutritionnel (CXG 2-1985)

5- Les Directives sur l'étiquetage nutritionnel frontal peuvent être avancées à l'étape 5 ou aux étapes 5/8 dans le document de l'ordre du jour provisoire ?	/
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Paraguay

1. Se invita a los miembros del Codex y observadores a:

- a) brindar observaciones generales y específicas sobre el anteproyecto de directrices (Apéndice II del documento CX/FL 21/46/6),
- (i) ¿Confirman la preferencia mayoritaria del Comité de eliminar la Sección 5 e incorporar aspectos relevantes de la Sección 5 a la Sección 4?

PARAGUAY confirma su preferencia de eliminar la Sección 5 e incorporar los aspectos relevantes de la Sección 5 a la Sección 4.

- (ii) ¿Están de acuerdo en que el texto propuesto para el principio 4.3.1 gestiona el potencial de conflicto de intereses en el desarrollo de un sistema de ENPFE?

El texto propuesto contempla el liderazgo del gobierno para el desarrollo del sistema ENFE y, contempla además considerar las perspectivas de todas las partes interesadas como colaboradores para el desarrollo del ENFE. Entendemos que la decisión final del sistema ENFE a ser implementado en el país es potestad del gobierno de acuerdo a sus mecanismos internos, lo que permitiría manejar el conflicto de intereses que pueda darse con las otras partes interesada. Por lo expuesto estamos de acuerdo.

- (iii) ¿Están de acuerdo con el cambio de enfoque del principio 4.3.2 para centrarse en facilitar el uso del ENPFE por parte de los consumidores?

Estamos de acuerdo con el cambio de enfoque del principio 4.3.2 para centrarse en facilitar su uso por partes de los consumidores, en lugar de los fabricantes, pues el ENFE va dirigido a los consumidores. No obstante, consideramos que la traducción al español de este principio no es claro, por lo cual proponemos la siguiente redacción:

“El ENPFE debe implementarse de manera que facilite SU USO POR PARTE DE LOS CONSUMIDORES”.

- (iv) Teniendo en cuenta los cambios propuestos a los principios, ¿están de acuerdo con eliminar las agrupaciones de principios?

PARAGUAY apoya la eliminación de las agrupaciones de los principios.

- b) considerar si las directrices se pueden adelantar al trámite 5/8 o 5, y

Consideramos que las directrices todavía requieren más discusión en algunos puntos, por lo que no vemos recomendable adelantar al paso 5/8, estamos de acuerdo que siga el trámite normal al paso 5.

- c) considerar si las directrices formarán parte de la Sección 5 “Información nutricional complementaria”, si serán un anexo de las Directrices sobre etiquetado nutricional (CXG 2-1985) o si constituirán un documento independiente

Consideramos que estas directrices tienen sentido como parte de la CXG 2-1985, ya que están claramente relacionadas con el contenido de ese documento. Creemos que el texto sería más apropiado como un anexo al documento.

OTRAS OBSERVACIONES GENERALES Y ESPECÍFICAS

Con respecto al punto 4. PRINCIPIOS PARA ESTABLECER SISTEMAS DE ENFE, se sugieren los siguientes cambios:

Punto 4.1: Paraguay cree conveniente que debe existir un solo sistema ENPFE recomendado por el gobierno de cada país, por lo cual se propone lo siguiente para ese texto:

“Solo un Sistema de ENPFE debe ser recomendado por el gobierno en cada país. Sin embargo, si coexisten múltiples Sistemas de ENPFE, estos deben ser complementarios, no contradictorios en sí. EL ENPFE debe calcularse y aplicarse al alimento de manera coherente con la declaración de nutrientes correspondientes para ese alimento cuando proceda.

Punto 4.2: PARAGUAY está de acuerdo con este punto, teniendo en cuenta que es importante destacar nutricionalmente tanto el contenido global de los nutrientes como los específicos, según la definición de ENPFE que consta en este documento.

Punto 4.3: Proponemos la siguiente redacción para mayor y mejor entendimiento del principio:

El ENPFE debe presentar la información de una manera que sea fácil de entender y utilizar por los consumidores en el país o región de implementación. El formato del ENPFE debe estar respaldado por una evidencia científica.

Punto 4.5: Proponemos la siguiente modificación: **El ENPFE debe permitir a los consumidores realizar comparaciones entre alimentos SIMILARES.**

Punto 4.8: Proponemos la siguiente redacción: **El ENPFE debe ir acompañado de un programa educacional, informando al consumidor para aumentar la comprensión y el uso del sistema.**

Republic of Korea

The Republic of Korea proposes the opinion that position of guidelines on front of pack nutrition labelling is appropriate to be included in the part of section 5 "supplementary nutrition information", an annex to the Guidelines on Nutrition Labelling (CXG 2-1985).

Russian Federation

Question 1: Do you confirm the Committee majority preference to delete Section 5 and to incorporate relevant aspects from Section 5 to Section 4?
Yes, we confirm our previously communicated position that Section 5 needs to be deleted from the guideline in full.
Question 2: Do you agree that the proposed text for principle 4.3.1 manages the potential for conflict of interest in the development of a FOPNL system?
We agree with the exclusion of <i>government</i> from the list of interested parties and accept the wording proposed by the Chairs: FOPNL should be government lead but developed in collaboration with all interested parties including private sector, consumers, academia, public health associations among others.

Question 3: Do you agree with the change in focus for principle 4.3.2 to focus on facilitating consumer use of FOPNL?
We agree that the FOPNL focus should be on facilitating consumer use of the schemes, rather than increasing uptake of the new labelling by the industry (as the principle stated in the previous version of the document). We agree with the new wording as proposed: FOPNL should be implemented in a way that facilitates consumer use of the FOPNL. However, we would like to note that this principle essentially duplicates the wording of the Purpose which reads that FOPNL is designed to facilitate the consumer's understanding of the nutritional value of the food and their choice of food. This purpose can be hardly achieved if FOPNL is not understood by consumers.

Question 4: Considering the proposed changes to the principles, do you agree with deleting the principle groupings?
Yes, we agree. Grouping principles brings no additional value to the document or its interpretation.

Question 5: Which of the following options do you prefer for the placement of the Guidelines on FOPNL:
<input type="checkbox"/> part of section 5 of the <i>Guidelines on Nutrition Labelling (CXG 2-1985)</i> <input type="checkbox"/> as an Annex to section 5 of the <i>Guidelines on Nutrition Labelling (CXG 2-1985)</i> <input type="checkbox"/> a stand-alone document
We would like to emphasize that the guideline should be considered only as a part of the <i>Guidelines on Nutrition Labelling (CXG 2-1985)</i> , as originally intended. Out of the three options offered, we prefer adding the guideline as an annex to section 5 of the <i>Guidelines on Nutrition Labelling (CXG 2-1985)</i> .

Additional comments.

1. We are of the opinion that section 2.1 of part 2. Scope requires further discussion. We do not support the approach that base FOPNL exclusions on Codex commodity standards. First, a few national and regional product categorizations/classifications around the world are not based on the Codex standards. The differences would certainly create misinterpretations of exclusions: a food that Codex Alimentarius places under a particular commodity standard may be regulated under other food groups in countries and regions. We believe that use of Codex standards for the purpose of naming/classifying commodities in the guideline is premature until a globally accepted system of food groupings is introduced and widely used. Second, the list of standards in the draft is not exhaustive. It misses, for example, standards for foods for special dietary purpose. In case of foods for special medical purposes, the inclusion of CXS 180-1991 is technically inconsistent, since the standard refers to the claims for FSMPs rather than describes the standard of identity. Therefore, we propose to remove the list of standards and explicitly exclude from the FOPNL scope the following foods under 2.2:

- Alcoholic beverages
- All foods for special dietary and medical purpose
- Single-component foods, i.e. oils, water, sugar, etc.
- Chewing gum
- Dietary supplements.

Under section 2.3 we support the proposal to follow CAC/GL 2-1985, in particular, section 3.1.2 which allows foods of nutritional or dietary insignificance or in small packaging be exempted from nutrition labelling, including the FOPNL.

We also note that for such products, providing voluntarily nutritional labelling might be more beneficial for consumers than replacing it with FOPNL.

2. We would like to repeat our previous comment related to the consumer research mentioned in one of the principles: the choice of FOPNL format should be supported with consumer research.

It is our position that the format of the FOPNL should be supported, where possible, by scientifically valid consumer research conducted in the region where the FOPNL is being implemented.

The current wording allows research done in one region to be used in support of the FOPNL format in another region. We believe such extrapolating practices are incorrect and may be misleading.

3. We also would like to note that FOPNL should not be used or implemented the way that encourages the use of some foods instead of the others. As a supplementary labelling, FOPNL should only provide consumer with information about nutritional value of foods without discriminating between them.

IACFO

Question 1: Do you confirm the Committee majority preference to delete Section 5 and to incorporate relevant aspects from Section 5 to Section 4?

We agree with deleting Section 5 and incorporating relevant aspects into Section 4.

As the aim of FOPNL is to inform consumer choice and improve public health, we are primarily concerned that the following relevant aspects of section 5 are incorporated in the remaining document:

- **Section 4 must acknowledge the need to safeguard FOPNL from possible conflicts of interest during development to support their public health objectives (see further question (ii))**
- **Section 4 should incorporate wording that allows Codex members to implement FOPNL on a mandatory basis to achieve their public health objectives (see further question (iii))**

Question 2: Do you agree that the proposed text for principle 4.3.1 manages the potential for conflict of interest in the development of a FOPNL system?

No, we do not agree that the proposed text for principle 4.3.1 manages the potential for conflict of interest in the development of a FOPNL system.

We advocate that Principle 4.3.1 should be rephrased to explicitly focus on avoiding undue commercial influence. We see no need for the Codex guidelines to include a list of parties that may collaborate with government in developing FOPNL.

The nature of the different constituents' interests involved in FOPNL development is recognised in the [WHO Guiding principles and framework manual for FOPNL](#). While recognising the need for appropriate public consultation during FOPNL development, this document specifically notes the importance of government retaining responsibility for key aspects of FOPNL development including development of the policy objectives and aims, and setting the nutrient profiling criteria via a commercially independent expert group.

Other existing WHO texts, including the [WHO draft tool for safeguarding against possible conflicts of interest in nutrition programmes](#), recognise the importance of governments being able to consider and set terms for appropriate engagement with different constituents in the nutrition area when designing and implementing public health nutrition policies.

Furthermore, we do not believe it is appropriate for Codex to effectively mandate that governments *collaborate* with all parties, particularly the private sector. In an analysis of FOPNL regulations developed through 2019, regulations were typically preceded by public consultation and only in limited cases was industry elevated to the role of collaborator or member of committees developing the substance of regulation (Jones et al, 2019, *BMJ Global Health*).

Our preferred text would read:

4.3.1. FOPNL should be government *lead*, ensuring robust safeguards against conflict of interest.

If the current language is retained, we advocate strongly that Principle 4.3.1 should use the word '**consultation**' rather than 'collaboration' and we advocate that private sector input should be confined to technical matters.

Question 3: Do you agree with the change in focus for principle 4.3.2 to focus on facilitating consumer use of FOPNL?

No, we do not agree with this change for principle 4.3.2 to focus on facilitating consumer use.

Consumer understanding and use of FOPNL is already dealt with in Proposed Principle 4.2.1 which provides: *FOPNL should present information in a way that is easy to understand and use by consumers in the country or region of implementation. The format of the FOPNL should be supported by scientifically valid consumer research.*

In this context, the utility of FOPNL for consumers is primarily related to the format of the label design chosen by government.

We believe that it is important to retain a specific focus in Principle 4.3.2 on the need for uptake by industry to be maximized to promote achievement of FOPNL's public health purpose.

Widespread uptake of FOPNL is a prerequisite to consumers' ability to use FOPNL as outlined in principle 4.2.3: "to make comparisons between foods." Especially in the context of interpretive labels such as "healthy" logos or "high in" warning labels, consumers need to know whether the absence of a label means the product is not "healthy" or "high in" as opposed to the manufacturer choosing not to apply the label—otherwise, consumers are impeded in their ability to use the label to make comparisons.

While it may not be appropriate for Codex to specify that FOPNL *must* be mandated (our preferred position), it is also important that nothing in Codex Guidance prevents governments from pursuing mandatory FOPNL where they believe mandatory implementation is necessary to pursue a legitimate public health objective. By 2021, at least 11 countries had already implemented mandatory FOPNL. There is also no evidence that voluntary FOPNLs currently operating have achieved high uptake. For example, after 5 years, the voluntary Health Star Rating in Australia and New Zealand was still on less than half of all products, and very few low scoring products, limiting its utility to consumers ([Shahid et al, 2020 Nutrients](#)). In European countries that adopted voluntary positive logos in the 1980s and 1990s, poor uptake has also limited public health impact ([WHO EURO report](#)). With these sorts of use patterns, FOPNLs become instruments of marketing more than mechanisms to convey critical health information.

We believe Principle 4.3.2 should reflect earlier text which stated:

4.3.2: *[FOPNL should be implemented in a way that maximises industry uptake]*

This leaves sufficient autonomy for governments to determine which regulatory settings or other incentives they wish to provide the private sector to achieve this aim.

Finally, we agree with the Chair's position to not specifically address trade implications in the principles as this is inherent in the purpose of Codex's work in this area.

Question 4: Considering the proposed changes to the principles, do you agree with deleting the principle groupings?

Yes, we agree with deleting the principle groupings

Question 5: Which of the following options do you prefer for the placement of the Guidelines on FOPNL:

- part of section 5 of the *Guidelines on Nutrition Labelling* (CXG 2-1985)
- as an Annex to section 5 of the *Guidelines on Nutrition Labelling* (CXG 2-1985)
- a stand-alone document

Until the content of these Guidelines is finalized, we do not have a final position on their best placement.

We request that the Codex Secretariat and/or the WTO Secretariat provide advice on any difference in the legal status of the Guidelines under the above three options, for example, whether they constitute a relevant international standard for the purposes of WTO law.

Consideration of whether the guidelines ready to proceed to stage 5/8, or stage 5?

It is important for public health and consumer advocates to understand the implications of these different procedural stages at Codex.

How far the Draft Guidelines proceed will determine how much further consultation is conducted on their content. Whether we believe that the Guidelines are ready to proceed depends to some extent on our overall satisfaction with their current content.

To support a vote that the Guidelines proceed to stage 5/8 for example, we may consider a set of minimum improvements that are addressed at CCFL46 to sufficiently address conflicts of interest (replace 'collaboration' with 'consultation') and include provisions that acknowledge the importance of maximizing industry uptake (e.g., through mandatory FOPNL/warnings).

Additional concerns to raise to support public health objectives of FOPNL:

• **Paragraph 18, Section 2.2 Exclusion of alcoholic beverages**

We agree broadly that FOPNL should not be used to suggest any alcohol is 'healthy', to promote alcohol consumption, or to promote one type of alcohol over another. However, consumers may benefit from the use of some types of FOPNL on some alcoholic beverages. For example, warning labels on alcoholic beverages that contain significant quantities of calories may help enable consumers to avoid excess calorie intake. This is important because excess calorie intake can result in an energy imbalance and contribute to obesity, and obesity is a major risk factor for non-communicable diseases including cardiovascular disease, type 2 diabetes, musculoskeletal disorders, and some cancers (<https://www.who.int/news-room/fact-sheets/detail/obesity-and-overweight>).

The critical factor here is the type of FOPNL used and the nutrient profiling model applied. For example, positive 'endorsement' style logos, or systems that rank products within a category are not appropriate for alcohol, but mandatory 'high-in' style labels may be appropriate. It may also be possible to include alcohol under a FOPNL but with a separate (more appropriate) nutrient profiling system.

We therefore do not agree that alcohol should be automatically excluded from FOPNL. Instead, amended wording could read: 'If FOPNL is extended to alcohol, it should be adapted to convey the unique health

risks and attributes of alcohol, which are distinct from other foods and beverages. FOPNL should not be used in any way that promotes alcohol consumption or conveys beneficial nutritional attributes.'

- **Paragraph 31 “High in” and “excess of” style FOPNL**

Paragraph 31 notes that “the EWG was asked in the first discussion paper to give its opinion on whether warning labels should be included in the definition of FOPNL, however, there was no consensus on this aspect.”

It is important that “high in” and “excess of” style FOPNL are recognized as FOPNL. “High in” and “excess of” FOPNL (sometimes referred to as “warning labels”) are already required in five countries and a growing body of evidence supports their superior efficacy compared to other types of FOPNL at reducing purchases of calories, sugar, and sodium (<https://onlinelibrary.wiley.com/doi/full/10.1111/jhn.12758>).

- **Principle 4.1.4**

Principle 4.1.4 states that “Consideration should be given to both the nutrients and the food groups [...] consumption of which is discouraged and encouraged by these documents.”

Principle 4.1.4 should be further amended so that it is applicable to varied styles of FOPNL. It currently states that consideration should be given to nutrients and food groups that are both discouraged and encouraged; however, many existing and evidence-based FOPNL – such as “high in” and “excess of” styles – consider only nutrients and food groups that are to be discouraged. To be inclusive of the array of FOPNL styles, Principle 4.1.4 should be updated to include “/or” after the words “discouraged and.”

- **Paragraph 32 Ongoing CCNFSFU work on nutrient profiles**

Paragraph 32 notes previous comments that, “it was indicated that CCNFSFU work on nutrient profiles should underpin any CCFL discussion on mandatory ‘high in’ statements; this CCNFSFU work should advance further before CCFL considers mandatory ‘high-in’ statements.”

Nothing happening at CCNFSFU should hold back national progress on FOPNL, as all existing FOPNL are based on a nutrient profile already. There is already a huge number of nutrient profiling models developed by governments for a variety of uses, and national implementation is not dependent on CCNFSFU’s ongoing additional work in this area. All FOPNL must be underpinned by valid nutrient profiling models, regardless of whether they are “high in” / “excess of” style labels, spectrum ratings or healthier choice logos.

WPHNA

General comments

The WPHNA reiterates some key comments to safeguard FOPL systems aiming to protect health and based on robust, independent science and evidence.

- 1) That the guidelines to develop FOPNL should avoid food industry collaboration in their drafting, and protect them of the potential conflict of interest this means. Therefore, they should not be participating/collaborating, but consulted with a clear transparency mechanism in place.
- 2) That the guidelines on FOPNL should not exclude small packaging, and processed complementary food products and formulas for infants should be excluded from having any FOPNL, and should be marketed and included as part of the International Code of Marketing of Breastmilk Substitutes and subsequent WHA resolutions.
- 3) That the guidelines should mention FOPNL should be statutory and not voluntary.
- 4) The guidelines should only include critical nutrients, and not nutrients or ingredients that might help the product to position itself as healthier without changing the critical nutrients.

Additional comments

Section 2.2 Alcohol products exemption or not from the FOPNL should be decided by each country depending on the FOPNL used. WPHNA suggest to make clear that any FOPNL should be used or misinterpreted as promoting any alcohol beverage as ‘healthy’, or to promote one type of alcohol over another.

Section 3.1 Although the term “interpretive” has been eliminated from the draft guidelines, it was debated in previous versions and has received substantial support. At this juncture, we want to underscore the importance of inserting the word “interpretive” in this paragraph. Interpretative labels are those recommended by the WHO in the report published by the Commission for Ending Childhood Obesity.

Section 3.2 WPHNA reiterates the importance of keeping as FONL styles warning claims such as 'high in' and 'excess of' and do not fall here within other health claims.

Section 4. This sentence needs clarification. It should be clear that a FOPNL may include nutrients to limit OR nutrients to encourage or both. But it should NOT be mandatory to include both. We suggest the following modification:

FOPNL should align with evidence-based national or regional dietary guidance or, in its absence, health and nutrition policies. Consideration should be given to both the nutrients and the food groups consumption of which is discouraged and encouraged by these documents.

WPHNA believes each country should have the ability to define critical nutrients and ingredients to include in its FOPNL, based on its priorities and adhering to its directives and guidelines

Answers to specific questions

Question 1.

Yes, it is preferable to eliminate section 5 and incorporate relevant aspects of Section 5 in Section 4.

However, the aspects in Section 5 that should be integrated into Section 4, relate to:

- the issue of governance and the need for FOPNL to be **developed** and **implemented** by government with robust safeguards against conflicts of interest and without the collaboration of the food industry, and **statutory** forms, and **interpretative** labels, based in the best available evidence should be preferred.

Question 2.

No, the proposed text for 4.3.1 does not address the potential for conflict of interest in the development of an FOPNL system. We reiterate the need for a phrase regarding the need for the FOPL development process to be led by governments with safeguards against conflicts of interest. We emphasize the need to prevent the food and beverage industry from participating in the development of front of pack labelling to protect the process from being influenced by commercial interests and ensure that FOPNL leads to protect public health and the right to food.

In this regard, the text on principle 4.3.2 should be re-drafted to state:

FOPNL should be developed by the government lead but and developed in collaboration consultation with all interested parties including government, consumers, academia, public health associations, private sector among others, ensuring robust safeguards against conflict of interest and with transparency mechanism available to all parties.

As the document entitled “WHO Guiding principles and framework manual for FOPNL” specifies, governments should be solely responsible for the key aspects of FOPNL development. It includes the policy’s objectives and aims, the nutrient profiling criteria to be used as a basis and to enable an independent expert group free of conflicting interests to guide such criteria.

Question 3.

WPHNA strongly disagrees with the change of focus of the principle. The guidelines should return to the principle proposed in previous versions. The emphasis should be on maximizing **implementation/uptake/use** of FOPNL by the industry, *not* consumer. In order for FOPNL to achieve its objectives, it must have **maximum uptake by industry**.

Returning to the original principle is important to encourage FOPNL developers to think through what types of FOPNL policies and regulatory measures will encourage uptake, especially considering this idea is not covered in any other principle.

The principle should be phrased as follows:

“FOPNL should be implemented in a way that maximizes/encourages industry uptake”

It should be noted that maximizing uptake by industry is a key component of a successful FOPNL, we know many voluntary schemes have not been successful because they have not managed to maximize industry uptake. Mandatory systems have proven successful and have shown great uptake by industry, such as in Chile. As stated in the PAHO report on FOPNL:

“There is no evidence to support that a voluntary approach can meet the intended purpose of a FOPL system. On the contrary, evidence has shown that food industry compliance with voluntary FOPL is low especially in instances where labels will reflect poorly on the products. The food industry is unlikely to comply with any voluntary FOPL that highlights negative properties of products they manufacture and discourages their purchase by consumers. Evidence from countries that have adopted a voluntary approach shows that companies selectively avoid applying the labeling to products of their portfolio that contain excessive amounts of critical nutrients, or they simply choose to not voluntarily apply the FOPL system at all” (see:

https://iris.paho.org/bitstream/handle/10665.2/52740/PAHONMHRF200033_eng.pdf?sequence=6)

Question 4.

WPHNA agrees on eliminating the grouping of principles.

Question 5.

WPHNA would like to have more information on the difference between an annex and directives in terms of use and legal implications to determine where these directives should be placed.