

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 11

CX/FL 21/46/11

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON FOOD LABELLING  
46<sup>th</sup> Session  
Virtual  
27 September – 1 October and 7 October 2021**

**DISCUSSION PAPER ON THE LABELLING OF PREPACKAGED FOODS IN JOINT PRESENTATION  
AND PREPACKAGED MULTI-PACKAGED FOODS  
(Prepared by Colombia)**

## **I BACKGROUND**

1. During the 44<sup>th</sup> Session of the Codex Committee on Food Labelling (CCFL44), held in Asunción Paraguay from October 16 to 20 2017, in the framework of future work, the Committee agreed to the proposal of Colombia to elaborate a discussion paper, on the labelling of foods in joint presentation and multipack formats.

2. As a result, at CCFL45, held in Ottawa, Ontario, Canada, on 13-17 May 2019, Colombia presented, as part of future work, the first discussion paper on the labelling of foods in joint presentation and multipack formats. Presenting the summary of the results it demonstrated: the absence of international guidelines; the lack of harmonised definitions for the labelling of foods in joint presentation and multipack formats.

3. Among the information presented by Colombia at CCFL45, the results of the request for comments were made known, to which twelve (12) member countries responded: Algeria, Australia, Canada, Chile, the United States of America, Guatemala, India, Indonesia, Mexico, Poland, Thailand and the European Union, as well as the International Council of Beverage Associations (ICBA), allowing to identify that:

- Countries agreed that they were not aware of international guidelines or work carried out regarding the labelling of foods in joint presentation and multipack formats.
- Countries indicated that the labelling of foods in multipack formats was regulated. In the case of Canada, there is recent legislation available corresponding to the new Safe Food for Canadian Regulations (SFCR) that entered into force in January of 2019.
- Countries agreed about the mandatory nature of compliance with food labelling regulations, which have been developed mainly by governments, the government with the participation of industry and, in the case of Canada, of consumers.
- Countries highlighted the lack of harmonization of the definitions of multipack and joint presentation formats, as part of the current problems of labelling these forms of marketing food.
- Countries indicated difficulties that occur when part of the information of the labelling of individual presentations becomes covered by the secondary packaging making it difficult to revise general and/or nutritional labelling.
- Countries emphasized that the standardization of definitions such as "multipack" and "joint presentation", would be an advantage in the implementation of the labelling of foods in joint presentation and multipack formats, as it would avoid subjective interpretations and generate an international harmonization of concepts.
- Some countries considered that industry would have no difficulty with the implementation of the labelling of foods in joint presentation and multipack formats. However, Canada stated that industry could face additional costs if new labelling requirements were applied, which would not be convenient for consumers because of the increased cost of food.
- The marketing of foods in joint presentation and multipack formats was a regular and significant practice in countries such as Chile, Guatemala, India and Mexico. The European Union states that

these types of formats are common at special times such as Christmas and Easter.

4. Since the justification for undertaking the new work was unclear, Colombia proposed that the Committee postpone discussion of the document until its next session, to allow delegates to reflect carefully on the issues highlighted in the document.

5. The Committee agreed on the need to update the discussion paper submitted by Colombia, taking into account the following aspects and *to request Colombia to*:

- *update the discussion paper taking into account the comments made at the session;*
- *identify gaps in the GSLPF for consideration at CCFL46; and*
- *consider the need for amendments to the GSLPF as opposed to a standalone standard;*

6. For the development of this document, Colombia took into account the comments made by the Committee, considered the gaps in the GSLPF and made proposals for amendments to the GSLPF.

## **II. JUSTIFICATION**

7. The purpose of food labelling is to provide the consumer with clear information about the product. However, today, prepackaged foods are presented in multipack formats (secondary packaging containing units of the same or of different products, where each unit is individually labelled), which often do not allow to see clearly the complete labelling information for each unit of sale (such as: expiration date or nutritional information, among others).

8. On the other hand, foods can also be found in joint presentation (containing units of different products labelled together), where the intention is to present to the consumer a single label that indicates a relationship between the foods making up the joint presentation, where they are either to be consumed as complementary food products or mixed together before consuming.

9. The GSLPF contains provisions that, as currently drafted, only allow the presentation of information on the labels of individually prepackaged foods. The same provisions would also apply to foods presented in joint presentations and / or multipack formats, but such information must be presented in a way that allows consumers to read such information.

10. For the above-mentioned purposes, Colombia presents the study of those provisions of the *General Standard for the Labelling of Prepackaged Foods* that it considers in need of updating, together with the respective proposals and recommendations (Appendix I).

11. Updating the GSLPF to also cover prepackaged foods in joint and/or multipack presentations would allow any future revision of the GSLPF to apply equally to prepackaged foods in joint presentations and/or multipack formats instead of requiring an independent guideline.

## **III. CONCLUSION**

12. Given the objective of the GSLPF is to provide information to allow consumers to make informed choices, and that such information applies equally to prepackaged foods presented in single format and to those presented in joint and/or multipack formats, it can be concluded that the GSLPF should be revised to address the labelling of prepackaged foods in joint presentation and/or multipack formats. A proposal is therefore made for CCFL to consider amending the GSLPF to address the aforementioned. The rationale and proposed amendments are presented in Appendix I to this document.

## **IV. RECOMMENDATIONS**

13. The Committee is invited to:

- Initiate new work on the amendment of the GSLPF to address the labelling of foods presented in multipack formats (The project document is presented in Appendix II).

## APPENDIX I

**Proposed revision to the General Standard for the Labelling of Prepackaged Foods  
(for information only)****2.1. Scope**

In accordance with the need presented, and evidenced, to have guidelines related to the manner and the information to be submitted for labelling purposes of prepackaged foods in joint presentation and/or multipack formats, in such a way as to provide clear information to the consumer, those foods marketed under these modalities are considered to fall within the scope of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).

**Recommendation 1.****1. SCOPE**

*This standard applies to the labelling of all prepackaged foods, prepackaged foods in joint presentation and/or prepackaged foods in multipack formats, to be offered as such to the consumer or for catering purposes, and to certain aspects relating to the presentation thereof.*

**2.2 Definition of Terms**

Taking into account that the adjustments to be made and included in the GSLPF are related to the labelling of prepackaged foods in joint presentation and/or multipack formats, terms that are not currently handled within the standard, it is necessary that these be included within the standard.

**Recommendation 2.**

**"Multipack"**: *Secondary packaging of sale, printed or transparent, specially designed to contain and exhibit a certain number of units of the same or different products, each unit contained must be individually labelled. Optionally it could contain a promotional object (which can be a food or other element).*

**"Joint presentation"**: *Is one that contains two or more units of products of different nature, prepackaged individually and jointly labelled (they have a single label that relates the foods that compose it), which are complemented or mixed for consumption.*

**2.3 Mandatory Labelling of Foods (Prepackages in Joint Presentation or Multipack format)**

Understanding that there are currently no international guidelines on food labelling in joint presentation, and taking into account the need for their inclusion, as well as the definition being proposed in the previous point (*Joint presentation: is one that contains two or more units of products of different nature, prepackaged individually and jointly labelled*); it is considered necessary to include additional specific aspects required by this type of labelling, in order to provide clear information to the consumer.

Similarly, taking into account the need to establish international guidelines regarding the labelling of multi-packaged foods, which correspond to foods packaged in a secondary sales container, printed or transparent, specially designed to contain and display a certain number of units of the same or different products, it is considered necessary to include additional specific aspects that this type of labelling requires, in order to provide clear information to the consumer.

**Recommendation 3.****4.1 The name of the food**

4.1.3 The names or denomination of all prepackaged foods contained in the joint presentation package should be listed without exception.

4.1.4 For foods in multipack formats, the name or corresponding denomination of all the products that it contains must be declared.

**4.2 List of ingredients**

4.2.1.1 The list of ingredients for each of the foods that integrate the joint presentation shall be headed or preceded by an appropriate title which consists of, or includes, the term 'ingredient'.

**Note 1:** For foods in joint presentation only, the list of ingredients for each food shall be headed or preceded by the name of the food, followed by the term "ingredient".

4.2.5 Declaration of ingredients in foods in multipack formats:

4.2.5.1 the list of ingredients shall be declared in each unit that makes up the multipack, therefore the legend "See list of ingredients in each product that makes up the multipack" shall be included.

4.2.5.2 Ingredients causing hypersensitivity shall be listed together with each product and shall always be declared as such.

**Note 2:** When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen shall not be marketed.

**4.3 Net contents and drained weight**

4.3.4 In the case of food in joint presentation in a different state, the net content of each of the components of this presentation shall be indicated.

4.3.5 For multipack foods only the net contents shall be declared in units of the International Metric System corresponding to the total of products constituting the multipack. If several types of foods are included, the total net content of each one must be declared.

**Note:** The number of units per type of food that constitute the multipack shall be indicated next to the net content. Example: 600ml (3 units of 200ml).

**4.4 Name and address**

The name and address of the manufacturer, packer, distributor, importer, exporter or vendor of the food shall be declared.

**Note 1:** For foods in joint presentation only, the name and address of the manufacturer, packer, distributor, importer, exporter or vendor of each of the foods that constitute the joint presentation shall be declared

**Note 2:** For foods in multipack format, the name and address of the person responsible for the multipack shall be indicated.

**4.5 Country of origin**

4.5.1 The country of origin of the food shall be indicated where its omission may be misleading or misleading to the consumer.

**Note:** For foods in multipack format, the country where the packing of the multipack has been carried out shall be indicated.

**4.6 Lot identification**

Each container of the foods that integrate the joint presentation shall be embossed or otherwise permanently marked in code or in clear to identify the producing factory and the lot.

**Note 1:** The prepackaged food in joint presentation shall be engraved or otherwise marked, but in an indelible form, with the identification of the lot to allow the traceability of the packer to be made.

**Note 2:** *Foods in multipack format should be embossed or otherwise marked in any other way, but in a permanent manner, the identification of the lot that allows the traceability of the packer. A sticker system may be used as long as it is guaranteed that it cannot be removed without breaking the multipack.*

#### **4.7 Date marking and storage instructions**

4.7.1 If not otherwise determined in an individual Codex standard, the following date marking shall apply unless clause 4.7.1 (vii) applies:

- (i) When a food must be consumed before a certain date to ensure its safety and quality the “Use-by Date” or “Expiration Date” shall be declared.
- (ii) Where a “Use-by Date” or “Expiration Date” is not required, the “Best-Before Date” or “Best Quality Before Date” shall be declared.
- (iii) The date marking should be as follows:
  - On products with a durability of not more than three months; the day and month shall be declared and in addition, the year when competent authorities consider consumers could be misled.
  - On products with a durability of more than three months at least the month and year shall be declared.
- (iv) The date shall be introduced by the words:
  - “Use-by <insert date>” or “Expiration Date <insert date>” or Best before <insert date>” or “Best Quality Before <insert date>” as applicable where the day is indicated; or
  - “Use-by end <insert date>” or “Expiration date end <insert date>” or “Best before end <insert date>” or “Best Quality Before end <insert date>” as applicable in other cases.
- (v) The words referred to in paragraph (iv) shall be accompanied by:
  - either the date itself; or
  - a reference to where the date is given.
- (vi) The day and year shall be declared by uncoded numbers with the year to be denoted by 2 or 4 digits, and the month shall be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the competent authority should determine whether to require the sequence of the day, month, year, be given by appropriate abbreviations accompanying the date mark (e.g., DD/MM/YYYY or YYYY/DD/MM).
- (vii) Provided that food safety is not compromised, the provision in 4.7.1 (i) or 4.7.1 (ii) is not required for a food if one or more of the following criteria apply:
  1. Where safety is not compromised and quality does not deteriorate because the nature of the food is such that it cannot support microbial growth (e.g., alcohol, salt, acidity, low water activity under intended or stated storage conditions;
  2. Where deterioration is clearly evident by physical examination at the point of purchase, such as raw fresh produce that has not been subject to processing and presented in a manner that is visible to the consumer;
  3. Where the key/organoleptic quality aspects of the food are not lost;
  4. Where the food by its nature is normally consumed within 24 hours of its manufacture, such as some bakers’ or pastry-cooks’ wares.

For example, foods such as:

- fresh fruits and vegetables, including potatoes which have not been peeled, cut or similarly treated;
- wines, liqueur wines, sparkling wines, aromatized wines, fruit wines and sparkling fruit wines;
- alcoholic beverages containing 10% or more by volume of alcohol;
- bakers' or pastry-cooks' wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture;
- vinegar;
- non iodized food grade salt;
- non fortified solid sugars;
- confectionery products consisting of flavoured and/or coloured sugars;
- chewing gum.

In such cases, the "Date of Manufacture" or the "Date of Packaging" may be provided.

- (viii) A "Date of Manufacture" or a "Date of Packaging" may be used in combination with 4.7.1 (i) or (ii). It shall be introduced with the words "Date of Manufacture" or "Date of Packaging", as appropriate, and use the format provided in clause 4.7.1(vi).

**Note 1:** The declarable date on the joint presentation food shall be that of the product with the expiration period closest to be fulfilled.

**Note 2:** The declarable date on the multipack format food shall be that of the product with the expiration period closest to be fulfilled.

#### **4.8 Instructions for use**

The label must contain the necessary instructions on how to use it, including reconstitution, if applicable, to ensure correct use of the food.]

**Note:** For multipack foods only, instructions may be abbreviated as long as the clarity of use is not lost to the consumer and the legend can be added stating that: "More details regarding the use of the product can be found on the interior labels".

#### **4.9 Minimum information for transparent multipacks**

Transparent multipacks which allow to see in a clear, complete and distortion-free manner the content of the product labels that they have inside, shall declare the following minimum requirements: the net content of the multipack, expiration date and assembly lot number.

In the event that the person responsible for the multipack is different from the manufacturer, packer, importer or exporter of the product, the name, address and country of origin of the person responsible for the multipack shall be indicated.

## APPENDIX II

**PROJECT DOCUMENT**  
**(for consideration and approval)**

**1. PURPOSE AND SCOPE OF THE NEW WORK**

The purpose of having a standard that harmonizes the labelling of prepackaged foods in multipack format (secondary container that includes units of the same or different products, where each unit is individually labeled) and of foods in joint presentation (contains units of different products where they are labeled jointly and the intention of its commercialization is to present the consumer with a single label that lists the foods that compose it, which are complementary to each other or mixed for consumption), it is to provide the consumer with the information of each of the products that are being acquired, to avoid subjective interpretations and to facilitate communication between the food manufacturer and its consumer.

This new work is to revise the *General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)* to address the labelling of prepackaged foods in multipack format and of foods in joint presentation.

**2. Relevance and timeliness**

Currently, there is a growing trend towards the trade/presentation of food in multipack format and in joint presentation, while the current regulations for food labelling are oriented to the requirements for individual units.

The lack of harmonization of the definitions of multipack formats and joint presentation, are part of the current problems with the labelling of these forms of food marketing. Difficulties arise when part of the labelling information of the individual presentations is covered by the secondary packaging, making it difficult to review the general and/or nutritional labelling and limiting, for the buyer and the consumer, the possibilities of making informed decisions.

**3. The main aspects to be covered**

1) The proposed work includes the revision of the *General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)* at least in the following aspects:

- a. Scope of application, to include prepackaged foods in joint presentation and prepackaged foods in multipack formats.
- b. Definition of the terms, to formulate and study the relevance of including the definitions of joint presentation and multipack formats.
- c. Mandatory requirements for prepackaged foods, in order to propose additions to requirements that are considered appropriate for prepackaged foods in joint presentation and prepackaged foods in multipack formats.

2) Updating the GSLPF to also cover prepackaged foods in joint and/or multipack presentations would allow any future revision of the GSLPF to apply equally to prepackaged foods in joint presentations and/or multipack formats instead of the need to have a separate independent guideline.

**4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES:****General Criterion**

**Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.**

The presentation of prepackaged foods in multipack .and / or joint format is a growing trend in food trade that poses challenges around consumer protection, such as access to the information declared on the label of each of the prepackaged foods.

This work is aimed at standardizing the labelling requirements of multi-packaged prepackaged foods and/or in joint presentation, guaranteeing fair practices in the food trade.

## Criteria Applicable to General Subjects

### a) Diversification of national legislations and apparent resultant or potential impediments to international trade.

Currently there are no known international guidelines or work carried out regarding the labelling of foods marketed in joint presentation and/or in multipack formats. The new proposed work will provide a standard for the labelling of prepackaged foods marketed in the referred presentations, which will facilitate international trade.

The labelling of food in multipack formats is regulated in some countries. In the case of Canada, there is recent legislation corresponding to the new Safe Food Canadian Regulations (SFCR) effective since January 2019.

### b) Scope of work and establishment of priorities between the various sections of the work.

It is proposed that the revision of the Standard and related texts (as appropriate) focus on its applicability to foods sold in joint presentation and/or multipack formats in order to amend the *General Standard for the Labelling of Prepackaged Foods*.

### c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental bodies

Currently there are no known international guidelines or work carried out regarding the labelling of foods marketed in joint presentation and/or multipack formats.

### Amenability of the subject of the proposal to standardization

The absence of regulations and harmonization of the relevant information that must be visible to the consumer of foods in multipack formats and in joint presentations, is limiting the possibilities of the buyer and the consumer to make informed decisions. An example of this is that information as relevant as that of the general and nutritional labelling is covered by the secondary packaging, preventing its review, as well as the limited identification of the main display panel (central panel) when several units are labelled in multipack format. The purpose of the new work is to review the *General Standard for the Labelling of Prepackaged Foods* and define specific requirements for the labelling of foods marketed in joint presentation and/or in multipack formats.

The proposed revisions to the GSLPF are an extension of the labelling provisions for single pack prepackaged foods and should not be difficult to standardize.

### d) Consideration of the global magnitude of the problem or issue

Currently there is a growing trend in the trade of food in multipack formats and in joint presentations. This is a regular and significant practice in countries like Chile, Guatemala, India, and Mexico. The European Union states that this type of format is common at special times such as Christmas and Easter.

The current standards for food labelling are geared towards the requirements for individual units.

Regarding containers covered by wrapping, health legislation generally refers to the application of the label to the container in a way that allows an easy reading of the information through it, or the declaration of the information on the wrapper, which implies in the first instance, that the general and nutritional labelling information presents difficulties in its visibility and/or is not always available and/or is not sufficient and clear enough for the consumer.

## 5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES

The proposed work is in line with the Commission's mandate for the development of international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The proposed work will contribute to advancing the Codex Strategic Goals 1 and 3.

*Strategic Goal 1. Address current, emerging and critical issues in a timely manner.*

The proposed new work addresses a growing trend in the food trade for which labelling requirements are not covered in the *General Standard for the Labelling of Prepackaged Foods*.

*Strategic Goal 3. Increase impact through recognition and use of Codex standards*

The definition of a standard in Codex regarding the labelling requirements of prepackaged foods in joint presentation or in multipack formats will favour the recognition and implementation of Codex standards, since there are no known guidelines or work on the subject and it is currently a common food trade practice in various countries.

#### **6. INFORMATION ON THE RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS**

The proposal is to revise the *General Standard for the Labelling of Prepackaged Foods*, and subsequently assess the need to amend further Codex documents. Updating the GSLPF to also cover prepackaged foods in joint presentations and/or multipack formats would allow any future revision of the GSLPF to apply equally to prepackaged foods in joint presentations and/or multipack formats instead of requiring a separate independent guideline.

The relevant labelling provisions for the trade of prepackaged foods in joint presentation or multipack formats, in the *General Standard for the Labelling of Prepackaged Foods* are horizontally applicable across all prepackaged foods marketed in the referred presentations.

#### **7. IDENTIFICATION OF ANY REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE**

None envisaged at this stage. There will be opportunities to consult with relevant bodies, if necessary, throughout the process.

#### **8. IDENTIFICATION OF ANY NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES SO THAT THIS CAN BE PLANNED FOR**

No need envisaged at this stage. There will be opportunities to consult with relevant bodies, if necessary, throughout the process

#### **9. PROPOSED TIMELINE**

Subject to approval by the 44<sup>th</sup> Session of the Codex Alimentarius Commission (2021), the work is expected to take 4 sessions or less of the CCFL with final adoption envisaged by the Codex Alimentarius Commission in 2025.