

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 12

FL48/CRD19

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON food labelling

Forty-eighth Session

Québec City, Québec, Canada

27 October - 01 November, 2024

(Comments of the United States of America)

Agenda Item 12: Discussion paper on Sustainability Labelling Claims

The United States supports national and international efforts to increase environmental sustainability. The United States notes that there are multiple international venues through which experts and policymakers engage internationally on environmental sustainability, such as the UN Framework Convention on Climate Change, the Conference of the Parties on Biodiversity, and the UN Convention to Combat Desertification. Codex and its subsidiary bodies make the most meaningful contributions when operating within their areas of expertise. In the area of environmental sustainability, this extends to food safety and fair-trade issues, not issues related to determining the meaningfulness of environmental claims or the environmental impact of a food.

There are food safety issues that are related to environmental sustainability to which the Codex Alimentarius is especially well positioned to contribute. For example, Codex is the appropriate international body to study questions and develop guidance related to the use and reuse of water in food applications, to ensure that recycled food contact material is safe and fit for purpose, to address food safety concerns due to algal blooms increasing with warming oceans, and to assess the safety and applicability of greenhouse gas reducing compounds in food.

The United States acknowledges the goal of this new work proposal is to manage the risk of greenwashing in labeling; however, it is unclear to the United States how environmental or sustainability claims on prepackaged food substantially differ from claims in general. We note that such claims are fully captured in the current definition of “claim” in the existing *General guidelines on claims* (CXG 1-1979).

The United States does not see the need for, nor the benefit of, CCFL adding an unnecessary layer of complexity to an existing guideline (CXG 1-1979) that supports countries in managing the risk of greenwashing by providing a framework to assess the veracity of a claim. This is detailed through the following provisions: 1.2 which stipulates that no food should be presented in a manner that is false, misleading, or deceptive, 1.3 which ensures the person marketing the food can justify the claims, and 3.3 which prohibits claims which cannot be substantiated.

The United States also emphasizes that sustainability generally and environmental claims specifically are complex topics with scientific, social, and economic aspects that are often interdependent and context specific, varying significantly from country to country. We note that there is no one-size-fits-all approach to improving environmental sustainability. In accordance with the Criteria for the establishment of work priorities,¹ the United States questions the amenability of this subject to standardization within the scope and expertise of CCFL, especially considering the significant work already undertaken by international organizations in this field better suited for developing guidance specific to sustainability initiatives.

Instead of starting new work that appears to be unnecessary and may be duplicative of or counterproductive to the efforts of other international organizations, the United States believes that CCFL should continue to focus its efforts on the topics and issues which it is uniquely qualified to address.