

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

FL48/CRD27

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Québec City, Québec, Canada

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(Comments from Food Industry Asia)

Agenda Item 6: Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce

FIA continues to support the removal of the 'Policy on Shipping' clause, reflected in the proposed Section 6.2 of the draft guidelines as reflected in FL48/CRD03, in its entirety due to complexity involved.

The variability in e-commerce operations—from brick-and-mortar stores with online shopping options to fully online marketplaces—complicates the consistent implementation and communication of a 'shipping policy' standard. Different e-commerce operations may have varying ways of presenting product information, which could lead to inconsistent application of the new term and further confusion for consumers.

Requiring e-commerce retailers or platform providers to provide a shipping policy for listed food products would increase the complexity for an already complex global supply chain. These challenges could lead to product that is within its labelled shelf life to not be sold and therefore increased food wastage. The shipping process varies based on the purchaser's location, urban or rural, and distance from the warehouse. Additionally, different food products have unique characteristics and differences in shelf-life duration, such as pasteurised milk having only a week shelf life while soda drinks have a shelf life of 9 months. Such labelling requirements would be challenging for manufacturers, e-commerce retailers, and platform providers to comply with. They would have to label each product they ship with a different 'durability period' and 'shipping policy', creating unnecessary regulatory burdens and costs.

E-commerce retailers or platform providers are unlikely to risk sending products with excessively short shelf-life duration to as they need to maintain a positive reputation and ensure continuous purchases. Therefore, we believe that these responsible parties will self-regulate and will not require Codex to include a principle to do so. If consumers do receive products too close to or after the shelf life, they can leverage existing channels to obtain refunds or replacements through the platform providers.

The responsible party determining the specific length of time a product is expected to arrive before the end of shelf-life is likely to prioritise flexibility and utilise the full shelf life of their products. Consequently, we anticipate that the expected minimum durability period will be set at a level that does not pose a challenge for the supply chain. This could lead to a situation whereby the timings are set close to or at the end of shelf-life, which would undermine the purpose of this clause.

We would also like to highlight that in the consultation process, most of the EWG Members (9 of 16), and Observers (6 of 8), disagreed with including a definition for durability in these guidelines. We urge the Chair and Co-Chairs to take into account the Members and Observers' preference to delete this term.