



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Quebec City, Canada

27 October – 1 November 2024

Comments by FIVS

Agenda Item 9: Discussion paper on Labelling of Alcoholic Beverages - CX/FL 24/48/10

1. EXECUTIVE SUMMARY

FIVS is an international federation serving trade associations and companies in the wine industry from around the world. It provides a forum for its members to work collaboratively on legal and policy issues and communicates Federation views to national governments and international organisations. FIVS is an active Observer in Codex Alimentarius.

Alcoholic beverages, including wine, are clearly and explicitly covered by Codex standards and guidelines, a view shared by the Codex Secretariat at the 45th Session of the Codex Committee on Food Labelling ([CCFL45](#)):

109. The Codex Secretariat clarified that the definition for food in the Procedural Manual also covered alcoholic beverages and that several Codex texts relating to food safety already specifically addressed alcoholic beverages.

110. The Codex Secretariat further clarified that as the GSLPF and related guidelines on nutrition labelling and claims were applicable to all foods they also applied to alcoholic beverages.

This means the major Codex standards relative to labelling, including the General Standard for the Labelling of Prepackaged Foods (GSLPF) and the Guidelines for Use of Nutrition and Health Claims already apply to alcoholic beverages. These standards and guidelines cover the essential aspects of food labelling such as the listing of ingredients and nutritional information, additives, allergens, sulphites and energy values. In numerous countries, national authorities have or are currently undertaking steps to ensure that wine products communicate this information. There is also work already being undertaken by other international and intergovernmental organisations aimed at harmonizing various aspects of wine labelling, as noted in the [FIVS Conference Room Document for CCFL 44](#).

The Discussion Paper on the labelling of alcoholic beverages prepared by the World Health Organization (WHO) proposes that the CCFL undertake work on aspects outside of traditional food labelling, such as health warning labels that are outside the mandate of CCFL and should be dealt with by national governments, as was stated in member government [replies](#)¹ to the Circular Letter (CL 2024/13-FL) and as noted in the [CCFL44 Report](#) which stated:

55: While there was broad support for work on these items, some concerns were raised on the proposed work on alcoholic beverages labelling, namely that some of the points raised in the WHO discussion paper were outside the mandate of CCFL, (e.g. health warnings on labels). These issues should be dealt with by national governments and should not be the subject of any future work.

FIVS supports robust labelling of wine and wine products but is of the view that this work is already being addressed at the national level.

2. BACKGROUND

In 2017, the World Health Organization (WHO) presented a discussion paper at the 44th session of the Codex Committee on Food Labelling (CCFL44) suggesting initiating new work on alcoholic beverage labelling within Codex. While there was agreement to produce discussion papers, no new papers were presented at CCFL45

¹ Canada: pg. 40; Costa Rica: pg. 52; Japan: pgs. 98-99; Mexico: pg. 117; Panama: pg. 140; Suriname: pg. 162; United States: pgs. 190-192.

or CCFL46. At CCFL47 in 2023, the WHO volunteered to prepare a new discussion paper for consideration at CCFL48. A [Circular Letter](#) (CL 2024/13-FL) on the subject was published in January 2024 to which FIVS [responded](#). In July 2024, WHO released a [Discussion Paper](#) (CX/FL 24/48/9) and provided recommendations for consideration at CCFL48.

3. FIVS POSITION: NEW WORK AT CODEX IS UNNECESSARY AND RISKS CONFUSION

A. WINE IS A FOOD

The Codex definition of food is clear and leaves no doubt that alcoholic beverages, including wine, are food products. The [Codex Procedural Manual](#) defines food² and several Codex texts specifically address alcoholic beverages and wine including:

- a. [General Standard for the Labelling of Prepackaged Foods](#) (GSLPF) which explicitly refers to alcoholic beverages under section 4.7.1.(vii).4 regarding foods exempted from date marking;
- b. [General Standard for Food Additives](#) which defines alcoholic beverages and seven subcategories of beverage types under 14.2
- c. [Guidelines on Nutrition Labelling](#) under section 3.3.1 *Calculation of Energy* for alcohol.
- d. [General Standard for Contaminants and Toxins in Food and Feed](#) for ochratoxin A and lead in wine
- e. [Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods](#) under section 3.1 *Additives permitted for use under specified conditions in certain organic food categories or individual food items – sulphur dioxide in wine*

Furthermore, at a national level, alcoholic beverages are generally classified and regulated as food³. Moving alcoholic beverages out of the food sector at the national level would require significant effort and will result in confusion.

B. INGREDIENT AND NUTRITION LABELLING IS APPLICABLE TO WINE

FIVS supports the provision of information to consumers through standards that seek to ensure that alcoholic beverage labelling is truthful, accurate, and substantiated. We believe that the current Codex definitions, standards and guidelines address all the mandatory elements necessary to label alcoholic beverages, including wine.

Given that wine is considered a food at Codex, other Codex standards and guidelines focused on cover all the major aspects of ingredient and nutrition labelling for foods, such as the listing of ingredients, additives, allergens, sulphites, and energy values apply. This includes some of the major Codex labelling standards and guidelines:

- [General Standard for the Labelling of Prepackaged Foods CXS 1-1985](#)
- [Guidelines on Nutrition Labelling \(CXG 2-1985\)](#)
- [Guidelines for Use of Nutrition and Health Claims \(CXG 23-1997\)](#)

C. EXISTING CODEX STANDARDS ON WINE LABELING ARE FIT FOR PURPOSE AND ARE BEING IMPLEMENTED

Many Codex member governments have already adopted mandatory and voluntary labelling requirements for alcoholic beverages covering key issues such as nutrition facts panels, ingredients, allergens, etc. This implementation by members demonstrates the relevance of the existing Codex standards. Alcoholic beverage regulation is also an area where governments of the World Trade Organization are particularly active, as evidenced by the over 15 notifications of proposed alcoholic beverage regulations in the [ePing Technical Barriers to Trade notification system](#) in the last year.

In addition, the labelling of wine and spirits of vitivincultural origin is well-regulated by the International Organisation of Vine and Wine (OIV), which comprises 50 member countries accounting for 75% of the total global vineyard surface, 71% of global wine production and 87% of global wine consumption. The OIV labelling standards are benchmarked against the Codex General Standard on Labelling of Prepackaged Food CXS-1 1985. All the requirements of this standard are observed in the OIV works, with the exception of the

² Food means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances used only as drugs.

³ Some examples include: Australia, Canada, Chile, European Union, New Zealand, South Africa, Switzerland, and the United Kingdom.

requirements regarding ingredient and nutritional labelling – the inclusion of which are currently under consideration within the OIV.

FIVS is aware that Codex members are active in considering new regulatory work in this area and one has recently implemented mandatory requirements. Australia and New Zealand have conducted consultations concerning the declaration of energy content information (in kilojoules), in a prescribed format, on the label of packaged alcoholic beverages. The United States has conducted listening sessions on the provision of ingredients, nutrition, and allergen information and the viability of providing this information off-label. In the European Union's 27 member states, ingredient and nutrition labelling is now mandatory under [EU Regulation 2021/2117, with the possibility of using electronic labels](#).

[The use of technology to provide for off-label presentation of some regulatory information is an emerging area particularly relevant to wine producers](#). In contrast with other food products, the ingredients in wine can vary greatly from vintage to vintage due to variations in climate and grape growing conditions. The use of QR codes for the off-label presentation of ingredients permits the flexibility needed while still being able to provide an accurate ingredient list.

D. HEALTH WARNINGS ARE REGULATED BY NATIONAL AUTHORITIES

Alcoholic beverages are best regulated by Codex member governments at the national level, including whether health warnings are appropriate based on cultural and societal needs. As already noted, this is a view shared by numerous member governments in response to the 2024 CCFL Circular Letter (CL 2024/13-FL) and reflected in the CCFL44 meeting report as noted in the Executive Summary. It is also a view articulated in the WHO's [Global Alcohol Action Plan 2022-2030](#), which relies on member states to implement policy objectives.

Member States have the primary responsibility for the development, implementation, monitoring, and evaluation of public policies to reduce the harmful use of alcohol according to their national needs and contexts.

There are many examples of Codex members regulating to require health warnings on alcoholic beverages. FIVS highlights six in particular as examples at the national level. Each of these have taken a different approach to address national needs and context.

1. Argentina: pregnancy pictograms are mandatory, and wines must display two health warnings: *Do not drink alcohol while pregnant or breastfeeding* and *Don't drink*.
2. Australia & New Zealand: positive health claims are prohibited, pregnancy warning labels are mandatory.
3. Chile: claims must not suggest or indicate therapeutic, curative effects and dosages, and three pictograms are mandatory.
4. France: pregnancy pictograms are mandatory.
5. Japan: alcoholic beverages must include a warning: *Drinking by minors is prohibited*.
6. Mexico: must display the warning: *The abuse in consumption of this product is harmful to health*.
7. United States: health warning statements are mandatory, and health claims are strictly regulated.

FIVS notes that the word "health" is used in the definition of Codex's purpose in the [Codex Procedural Manual](#)⁴:

Codex's purpose is, inter alia:

- *protecting the health of the consumers and ensuring fair practices in the food trade;*

However, protecting the health of consumers has typically been understood at Codex as ensuring that consumers can trust the safety and quality of the product they buy, based on the best scientific and technical knowledge of food safety. Health warnings do not fall into this category. That is, as referenced in the CCFL44, health warnings fall outside the mandate of CCFL.

⁴ pg. 7