

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6, 7, 8, 9, 10, 12, and 13

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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(Comments from Uganda)

Uganda appreciates the opportunity to provide comments on the different agenda items to be discussed at the 48th Session of Codex Committee on Food Labelling.

AGENDA ITEM 5.1: REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING (STEP 7) - COMMENTS IN REPLY TO CL 2024/53 -FL CX/FL 24/48/5 ADD. 1 (PART A)

a) Definition of 'food allergen' – two draft definitions are provided in Appendix II for CCFL consideration.

Position: Uganda observes that the two definitions of a food allergen differ only little. However, Uganda would be in favor of considering definition one because it is explicit and precise.

Rationale: It's explicit and precise

b) Section 4.2.1.6 - Exemptions in relation to the scientific advice and proposed alternate text, and whether to provide a list of exemptions in the GSLPF (or elsewhere), or alternatively to reference the 'current accepted exemptions' as examples.

Position: Uganda proposes to amend the agreed existing text (appendix II) with the addition of "including the weight of evidence and exposure assessment where necessary" after the established criteria.

Rationale: This will not only emphasize history of safe use but also Weight of Evidence

New amendment of 4.2.1.6 to read as: Subject to evaluation using established criteria **including the weight of evidence and exposure assessment**, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared.

c) Section 4.2.1.7 - Sulphite and proposed revised text, which includes the option of 'food as offered to the consumer' and 'food as consumed'.

Position: Uganda proposes that the option "as offered to the consumer" in the square brackets be considered

Rationale: A regulator will only safeguard the customer up until the point at which they receive the pre-packaged food; hence, monitoring at 10 mg/kg or more is only feasible at this stage and cannot continue after the consumer has made the purchase of the food.

d) Section 8.3 – Declaration of certain foods and ingredients and specifically the proposed revised text for sections 8.3.1, 8.3.2 and 8.3.2.1.

Position: Uganda is in agreement with the proposed texts as its aligns with the GSLPF

e) Whether the revision to the GSLPF (Appendix II) is ready to advance to Step 8

Position: Uganda supports that GSLPF (Appendix II) is ready to advance to Step 8

AGENDA ITEM 5.2: GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING (STEP 4) CX/FL24/48/5 (PART B)

a) Purpose section in regard to determining if and how PAL thresholds can address cross contact from gluten containing cereals for consumers with coeliac disease

Position: Uganda supports the amendment to consider addition food to allergy or coeliac disease to the purpose section

Rationale: It highlights the importance of effective allergen management practices, the careful use of PAL, and a strong focus on consumer safety, all grounded in established guidelines and risk assessment principles.

b) Principle 4.2 in regard to proposed alternative text on the types of risk assessment.

Position: Uganda supports the amended text as presented in appendix II.

Rationale: it's because the amendment provides clarity about a scientifically sound, flexible, and consumer-protective approach to allergen labelling, which ensures that decisions are made based on thorough risk assessments.

c) Principle 4.3 and the table of reference doses in 4.3.1 particularly in relation to inclusion of gluten.

Position: Uganda supports the agreed with text

Rationale: it highlights the conditional nature of PAL use, the importance of reference doses, consumer protection, and the encouragement of effective allergen management practices, all aimed at ensuring food safety and minimizing allergen exposure risks.

d) Whether the text is ready for advancement to Step 5.

Position: Uganda supports the text to be advanced to step 5

e) Whether to provide further advice to CCFH to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80- 2020) with the revision to the GSLPF and the guidelines on the use of PAL.

Position: Uganda supports for further advice to CCFH to ensure consistency between the Code of Practice (CXC 80-2020) and the GSLPF revisions, emphasizing scientific guidance, best practices, consumer safety, and collaboration. This approach will contribute to a more effective framework for allergen management and labelling in the food industry.

AGENDA ITEM 6: PROPOSED DRAFT GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PRE-PACKAGED FOODS TO BE OFFERED VIA E-COMMERCE: (STEP 7) CX/FL 24/48/6

On the proposed bracketed text in clause 5.1.

Option A: [An indication of durability of pre-packaged food is encouraged to be provided.] [For the purpose of this clause, "durability" means the period between the point of delivery and the best-before or use-by date in which the food retains its specific properties when properly stored.]

Option B: [It is encouraged that an indication of the minimum number of days the product will be delivered to the final consumer before the "Use-by Date", "Expiration Date", "Best-Before Date" or "Best Quality Before Date" be provided'],

Option C: the 'indication of durability' clause and definition should be removed entirely.

Position: Uganda supports the modification as proposed in option A.

Rationale: An indication of the durability will guide both purchaser and competent authorities in making decisions on the period within which the product is expected to arrive before the expiration of the product. Hence the definition also provides common understanding on the use of the term in this context

AGENDA ITEM 7: PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING (CX/FL 24/48/7)

Review the addition of [audible] in section 7.10 and the new provision on costs in section 7.12 to align with the work on e-commerce.

a) 7.10 Food information described or presented using technology shall be clear, prominent and readily legible [or audible] to the consumer under normal settings and conditions of use of the technological platform.

Position: Uganda supports the addition of [or audible] in 7.10.

Rationale: The inclusion of "or audible" in the draft guidelines ensures that food information is accessible to consumers who may rely on audio due to visual impairments or other limitations. This promotes inclusivity and aligns with accessibility standards, allowing a broader range of consumers to receive clear and prominent food information, whether it is presented visually or through audio.

b) [7.12 Where food information is provided using technology, it shall be provided without any additional costs for the consumer.]

Position: Uganda supports the addition of 7.12.

Rationale: Manufacturers have already incorporated the cost of a physical label into the cost of the product, therefore access to information using technology should not be provided as an additional cost to the consumer.

AGENDA ITEM 8: AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS

Position: Uganda is in support with amendment to the definition of container by replacing “such as” with “including” in the new added text and for joint presentations to come before multipack formats for consistency with the rest of the clauses. The proposed new text to read: A container may enclose several units or types of packages when such is offered to the consumer, **including joint presentations or multipack formats.**

Uganda is also in support of advancing the text to the next steps.

Rationale: The proposed amendments to the standard will strengthen the provisions in GSLPF (CXS 1-1985) and ensure concise information is provided to consumers regarding pre-packaged foods in relation to joint presentation and multipack formats. Since the GSLPF (CXS1-1985) scope covers pre-packaged foods with regards to joint presentation and multipack formats, modification of the definition to include joint presentation and multipack formats is necessary. Provision of detailed information on presentation of mandatory information will ensure that the draft standard adequately covers the identified gaps in the project document.

AGENDA ITEM 9: LABELLING OF ALCOHOLIC BEVERAGES CX/FL 24/48/9

General comment: Uganda recognizes that this work will assist countries in addressing the labelling of alcoholic beverages in a broader context. Given the significant impact of alcohol on individual health, Uganda is committed to actively participating and providing input throughout the process. Additionally, Uganda looks forward to engaging in discussions on the classification of alcohol as either a food or a non-food item.

AGENDA ITEM 10: APPLICATION OF FOOD LABELLING IN EMERGENCIES CX/FL 24/48/10

Uganda is in support of the work and will be following discussions on developing guidelines on food labelling in emergencies.

AGENDA ITEM 12: SUSTAINABILITY LABELLING CLAIMS CX/FL 24/48/12 - DISCUSSION PAPERS

Uganda agrees that there is a need to provide guidance on sustainability claims especially related to the environment as a way to enable manufacturing to contribute to SDG 13. However, the claims must be substantiated and accurate to avoid falsification. As a result, Uganda looks forward to discussions and development of the project paper for approval by CAC.

AGENDA ITEM 13: SUGAR LABELLING –DEFINITION FOR “ADDED SUGARS” CX/FL 24/48/13

Uganda supports the need for a clear definition of “added sugar”, as it would help consumers make informed choices and could assist in reducing the consumption of added sugars. Furthermore, a harmonized global definition would promote fair trade practices by establishing a common criterion. However, there is also a need to clarify the purpose and methodologies of verification to ensure its effectiveness and applicability.