

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 8

CX/FL 24/48/8-Add.1

October 2024

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Quebec City, Canada

27 October – 1 November 2024

AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS (STEP 4)

Comments in reply to CL 2024/56-FL

*Comments by Argentina, Australia, Brazil, Canada, Chile, Colombia, Ecuador, Egypt,
European Union, Guatemala, Honduras, India, Indonesia, Iran, Jamaica, New Zealand,
Paraguay, Saudi Arabia, South Africa, Thailand, Uruguay, USA
and Food Industry Asia, FoodDrinkEurope, ICBA, ICGA, International Confectionery Association*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/56-FL issued in August 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

Annex I

GENERAL COMMENTS	MEMBER / OBSERVER
<p>Argentina, entiende que este texto aun no está listo para avanzar en el proceso de tramitación. Entendiendo que varias de las enmiendas propuestas al NGEAP son redundantes, y reiteran contenido que ya está contemplado en el NGEAP.</p> <p>De todas formas, se incorporan algunos comentarios en el proyecto de enmiendas que figura como anexo II.</p> <p>Se entiende que este tipo de presentaciones ya están alcanzadas por las normas de etiquetado, no obstante, se podría acompañar la inclusión de algunas referencias incluidas las definiciones a los fines de dar más claridad.</p> <p>Asimismo, con base en el resumen de las respuestas a la consulta anterior, se señala que hubo varias secciones que la mayoría de los encuestados no estuvieron de acuerdo en incluir, pero que sin embargo se introdujeron en esta nueva propuesta de todos modos, por lo que se sugiere se evalúe la posibilidad de contemplar las posiciones mencionadas que reflejen el consenso de la mayoría de los encuestados y evite la inclusión de información innecesaria.</p> <p>En este contexto, Argentina desea señalar que este tema actualmente está siendo debatido en el ámbito del MERCOSUR, particularmente están siendo discutidos los conceptos de "envases múltiples" y "presentación conjunta", así como eventuales disposiciones en cuanto a la declaración de la información obligatoria vinculados a ellos, en el marco de la revisión de las Resoluciones GMC N° 26/03 "Reglamento Técnico MERCOSUR sobre Rotulado de alimentos envasados" y la Resolución GMC N° 46/03 "Reglamento Técnico MERCOSUR sobre el Rotulado nutricional de alimentos envasados".</p>	<p>Argentina</p>
<p>Australia would like to thank the EWG Chairs Colombia and Jamaica for the progress made on the revision to the GSLPF relevant to joint presentation and multipack formats. We support the majority EWG view that it is more practical to adjust the definitions' section as well as section 8. However, we consider the proposed text in Appendix II of the CCFL48 agenda paper can be further simplified and streamlined and still achieve clarity for the labelling of joint presentation and multipack formats (see specific comments below).</p> <p>Australia does not consider the text is ready to advance in the Step process. Subject to CCFL48 consideration and agreement to simplify and streamline the proposed amendments, Australia could support advancing the draft guidelines.</p>	<p>Australia</p>
<p>Brazil would like to thank Colombia for chairing the electronic working group on the revision of the provisions relevant to joint presentation and multipack formats in the General Standard for the Labelling of Pre-packaged Foods.</p> <p>Brazil supports the proposed amendments to the definitions of 'container' and 'prepackaged' in the GSLPF to clarify that these definitions apply to joint presentation and multipack formats. However, for consistency in the terminology used to refer to these types of presentations, we would like to suggest the following amendment to the definition of 'container.'</p> <p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations and multipack formats.</p> <p>Regarding the definition of 'multipack format,' we suggest deleting the word 'secondary,' considering that the term 'outer' is sufficient for a correct understanding of the definition and that some multipacks may have tertiary packaging as the outermost layer. In addition, we agree</p>	<p>Brazil</p>

<p>with the addition of the note for clarity, but we suggest including the words 'same or' and replacing the phrase 'larger package' with 'container' for consistency with the definition of 'multipack format'.</p> <p>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed. separately.</p> <p>Note: For example, small packages of French fries of same or different flavors in a larger package container.</p> <p>In relation to the definition of 'joint presentation,' we suggest including the word 'format' for consistency with the definition of 'multipack format' and the terminology used in the revision to reference these types of presentations. Additionally, considering that some joint presentations may not have an outer container, we suggest replacing the phrase 'a consisting of an outer container' with 'that presentation'.</p> <p>"Joint presentation format" means a consisting of an outer container that presentation that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</p> <p>Note: For example, yogurt and cereal.</p> <p>Brazil supports the proposal to amend section 8 of the GSLPF to provide clarity regarding the presentation of mandatory information on foods in joint presentation and multipack formats. We also agree with the principle that mandatory information must be included on the outer container when the packaging is opaque and does not allow such information to be viewed on the food it contains. This approach ensures that consumers have access to essential information about the food characteristics without the need to open the package.</p> <p>We also agree that, in the case of the name and address of the product packer, it is important for this information to be declared on the outer container when it differs from the manufacturer, packer, importer, or exporter of the products inside.</p> <p>We understand that further discussions are necessary regarding the requirements for the presentation of the name, date marking, and net content of foods in joint presentation and multipack formats. Additionally, CCFL is reviewing the provisions relevant to allergen labeling, and the amendments should take into consideration how allergen statements should be presented in these types of presentations.</p> <p>Brazil understands that further discussions are necessary to address the revision of the provisions relevant to joint presentation and multipack formats in the GSLPF and that the document should not advance in the step procedure.</p>	
<p>Canada would like to thank Columbia for the work on the Labelling of Foods in Joint Presentation and Multipack Formats. Canada appreciates the progress made and will be in a better position to comment on whether it is ready to proceed in the Step process after seeing if further adjustments are made as a result of the Circular Letter. We are pleased to offer the following comments.</p> <p>NOTE: Canada has proposed adjustments to Section 4 of the GSLPF based on the draft text that was in Section 8 of the CL, so has shown it here as placed within the existing text.</p> <p>4. MANDATORY LABELLING OF PREPACKAGED FOODS</p> <p>4.2.1 Except for single ingredient foods, a list of ingredients shall be declared on the label.</p> <p>In the case of foods sold in multipack format or joint presentation, a separate list of ingredients should be provided for each individual food, except in the case of foods in joint presentation, in which case a single combined list of ingredients for all the foods may alternatively be provided</p>	<p>Canada</p>

Comment: Canada suggests that requirements relating to what mandatory labelling must be provided belong in Section 4, whereas Section 8 should remain for matters of format and presentation. Therefore, Canada suggests section 4.2.1 is the appropriate place to discuss list of ingredients requirements and has proposed text on how lists of ingredients should be provided for foods in multipack format and joint presentation.

4.3 Net contents and drained weight

4.3.4 In addition to the declaration of net contents, in the case of foods sold in multipack format [and joint presentation], the net contents for each unit, and the number of units per type shall be provided.

Comment: Canada suggests that requirements relating to what mandatory labelling must be provided belong in Section 4, whereas Section 8 should remain for matters of format and presentation. Therefore, Canada suggests section 4.3 is the appropriate place to discuss net quantity requirements for multipack foods. This is similar to the intent of the draft text in section 8.1.4. Canada notes that the declaration of net contents in section 4.3.1 already requires total net contents for the food as sold and so this is not necessary to state again. Together, section 4.3.1 and the proposed section 4.3.4 would require a declaration such as 600mL (3 units of 200mL). Canada has placed joint presentation in square brackets in our proposal for the Committee to consider whether the same should apply to those products.

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:

(vi) bis: In the case of foods sold in multipack format and joint presentation, the date provided should be that of the product with the date closest to completion, if the individual units contained in those formats have varying dates .

Comment: Canada suggests that requirements relating to what mandatory labelling must be provided belong in Section 4, whereas Section 8 should remain for matters of format and presentation. Therefore, Canada suggests section 4.7 is the appropriate place to discuss date marking requirements for multipack format and joint presentation. Canada has included text similar to the intent the proposed 8.1.3.3. Canada did not transfer the text about not exempting each of the individual units that make up the presentation from having their respective date marking – we note that as the prepackaged product is the multipack/joint presentation, there is no labelling requirement for the individual units to exempt them from. However, the Committee may wish to consider whether the individual units that make up the multipack or joint presentation should be labelled with certain information in addition to the labelling of the multipack format/joint presentation itself, such as information that remains available during the use of the individually packaged units.

Chile agradece la invitación a participar en este trabajo:

Chile tiene observaciones sobre los siguientes puntos:

i) las enmiendas propuestas a la Norma general para el etiquetado de los alimentos preenvasados que figuran en el Apéndice II del documento CX/FL 24/48/8, y

Respuesta:

Chile no apoya las nuevas secciones específicas propuestas para la Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1985), excepto las definiciones de presentación conjunta y formato de envase múltiple en la Sección 2, así como la sección sobre el contenido neto. Consideramos que el texto actual de la Norma aborda de manera adecuada los requisitos para los alimentos preenvasados, incluidos aquellos que utilizan estas presentaciones.

Chile

<p>Según el análisis del resumen de respuestas de la consulta anterior, comprendemos que hubo varias secciones con las que la mayoría de los encuestados no estuvo de acuerdo en incluir, pero que fueron reintroducidas en esta nueva propuesta. Chile solicita que se tomen en cuenta las sugerencias de la mayoría de los encuestados para asegurar que cualquier revisión final de la Norma refleje un consenso amplio, evitando la inclusión de información innecesaria que pueda generar confusión o dificultar la implementación efectiva de la regulación.</p> <p>Este enfoque garantiza que la Norma mantenga su relevancia y aplicabilidad práctica, al tiempo que se promueve una mayor claridad y consistencia en el etiquetado de los alimentos preenvasados, alineado con los intereses y necesidades de los consumidores y la industria.</p> <p>ii) si el texto está listo para avanzar en el procedimiento de trámites.</p> <p>Respuesta:</p> <p>Chile considera que este texto aún no está listo para avanzar en el proceso de tramitación. Estimamos que la mayoría de las enmiendas propuestas a la Norma General para el Etiquetado de los Alimentos Preenvasados (CXS 1-1985) son innecesarias, ya que reiteran contenido que ya está contemplado en la Norma vigente.</p> <p>Antes de proceder a la siguiente etapa, creemos que es fundamental alcanzar un consenso entre la mayoría de los Miembros y Observadores sobre la necesidad real de incluir las secciones específicas propuestas. En ausencia de dicho consenso, el avance prematuro del texto podría generar confusión y duplicación de normativas, lo que iría en detrimento de la claridad y la coherencia del marco regulatorio actual.</p> <p>Por lo tanto, Chile recomienda que se continúe el debate hasta que se logre un acuerdo mayoritario que respalde cualquier cambio significativo, asegurando así que el texto final responda a las verdaderas necesidades de la comunidad internacional y de los consumidores.</p>	
<p>Si, se considera que documento está listo para avanzar en el procedimiento de trámites.</p>	<p>Colombia</p>
<p>El país considera que el documento está listo para avanzar en el procedimiento de trámites correspondiente; sin embargo, se apoyaría la mejor decisión en la plenaria de la CCFL48.</p> <p>Ecuador considera que las enmiendas propuestas se encuentran bien estructuradas, brindando mayor claridad al documento a través de los ejemplos descritos; por lo que, el país está de acuerdo con las mismas.</p>	<p>Ecuador</p>
<p>The European Union and its Member States (EUMS) would like to make the following comments:</p> <p>1. On the current scope and provisions of the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)</p> <p>As already explained previously, the EUMS consider that the Codex General Standard for the Labelling of Prepackaged Foods (GSLPF) provides labelling requirements that apply to all prepackaged foods to be offered as such to the consumer or for catering purposes, whether offered in individual packages or in “joint presentation” or “multipack formats”.</p> <p>In particular the definition of “container”, which specifies that “a container may enclose several units or types of packages”, makes it clear that the scope of the GSLPF includes already prepackaged foods in “joint presentation” and “multipack formats”.</p> <p>Furthermore, sections:</p> <ul style="list-style-type: none"> - 8.1.2 “Statements required to appear on the label by virtue of this standard or any other Codex standards shall be clear, prominent, indelible and readily legible by the consumer under normal conditions of purchase and use”, and 	<p>European Union</p>

<p>- 8.1.3 “Where the container is covered by a wrapper, the wrapper shall carry the necessary information or the label on the container shall be readily legible through the outer wrapper or not obscured by it”,</p> <p>provide already that the mandatory labelling particulars shall, in the case of “joint presentation” and “multipack formats”, either be on the wrapper or be readily legible through the wrapper / not obscured by it.</p> <p>2. On the proposed definitions of “joint presentation” and “multipack formats”</p> <p>The definitions proposed are:</p> <p>““Multipack format” means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</p> <p>Note: For example, small packages of French fries of different flavors in a larger package.</p> <p>“Joint presentation” means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.”</p> <p>Note: For example, yogurt and cereal.”</p> <p>The EUMS’ view is that the proposed definitions lack clarity, and add complexity and uncertainty as:</p> <ul style="list-style-type: none"> - The main differentiating criterion between “joint presentation” and “multipack formats” is whether the different units of food they contain are “intended to be consumed separately” or “supplemented or mixed for consumption”. This creates legal uncertainty and may cause confusion, as this criterion is open to interpretation. For example, small packages of French fries of different flavors are often consumed together, whereas yogurts and cereals can also be consumed separately (i.e. they do not need to mixed for consumption). Moreover, the EUMS fail to understand the reasons that consumption of various items together or separately is used as a criterion for the classification of foods for labelling purposes; - The definitions introduce, in addition to “wrapper” already mentioned in the GSLPF and to “outer packaging” mentioned in the additions proposed to section 8, the concepts of “outer container” and “secondary outer container” without defining them. 	
<p>We do support the current approach to focus on a specific definition for multipack format products and on specific provisions for presentation of information under chapter 8 for such products. When the comments of members and observers converge, we could see progress</p>	<p>FoodDrinkEurope</p>
<p>Guatemala considera que hasta que no se analicen los puntos anteriores, no cree que este texto esté listo para avanzar en el proceso de etapas.</p>	<p>Guatemala</p>
<p>Honduras esta de acuerdo en que el documento inicie el procedimiento de tramites</p>	<p>Honduras</p>
<p>ICBA does not believe that this text is ready to advance in the step process. We consider that most of the proposed amendments to the GSLPF are unnecessary as they reiterate content that is already covered by the GSLPF. Until there is consensus by the majority of Members and Observers on the need for specific sections to be added to the GSLPF, we believe that this text is not ready to advance to the next step.</p>	<p>ICBA</p>
<p>ICBA does not support the specific proposed new sections to the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), except for the definitions of joint presentation and multipack format under Section 2 and the section about net content. As specified in the comments below, we believe that the current text of the GSLPF adequately addresses the requirements proposed in this consultation for prepackaged foods, including those using these types of presentations. Based on the summary of responses to the previous consultation,</p>	<p>ICBA</p>

we understand that there were several sections the majority of respondents did not agree to include, but which were reintroduced in this new proposal regardless. We respectfully request the Chair and Co-Chair to account for the majority of respondents' suggestions to ensure any final revisions to the GSLPF reflect the consensus of the majority of respondents and avoids the inclusion of unnecessary information.	
<p>ICGA would like to thank Colombia - and all the other participants - for the time invested in animating the intersessional electronic working group which led to this result.</p> <p>ICGA appreciates the opportunity to provide the following comments in response to this circular letter.</p> <ul style="list-style-type: none"> - ICGA supports the general objectives of these guidelines to help providing guidance to countries to handle complex issues relating to foods sold in multipacks or in joint presentations. - ICGA would like to share also a couple of more specific comments on the text as indicated further below in this document. <p>ICGA is looking forward to the first full review of the proposed guidelines by the forthcoming CCFL48 plenary meeting for a possible fast-track advancement.</p>	ICGA
Indonesia supports that the text is ready to advance in the step process.	Indonesia
Jamaica recognizes that its comments to the document are past the deadline. However, we ask that our comments still be considered/included	Jamaica
<p>New Zealand thanks Colombia and Jamaica for their work on the draft amendments to the GSLPF to provide clarity for the labelling of foods in multipack and joint presentation formats.</p> <p>New Zealand considers restricting amendments to Section 2 Definition of terms and Section 8 Presentation of mandatory information is a big improvement on the previous proposal which provided amendments to many sections of the GSLPF. However, we consider this could be streamlined further.</p> <p>We provide suggestions to further clarify the proposed definitions under the respective definitions below.</p> <p>While New Zealand supports including clauses specific to the presentation of mandatory information on multipack formats and joint presentation in section 8, we do not support the proposed new clauses 8.1.3.1, 8.1.3.2, 8.1.3.3 or the footnotes to 8.1.4. We believe the requirements for presentation of mandatory information for these packaging formats should be achieved through inclusion of two overarching sub-clauses that relate to the presentation of all required labelling, one addressing requirements for multipacks and another addressing requirements for foods sold in joint presentation.</p> <p>We proposed text for these two overarching sub-clauses in comments to 8.1.3 below.</p> <p>New Zealand could support advancement of the text in the step process if the text was simplified in line with our suggestions. We reserve our decision on whether to advance the text until discussions at CCFL48 have occurred.</p>	New Zealand
De acuerdo con la propuesta, el documento puede avanzar en el siguiente trámite	Paraguay
Saudi Arabia does not support the advancement of the text to the next step in the process at this time. We believe that further revisions are needed to address the concerns and comments raised by Saudi Arabia to ensure that the text meets the necessary standards and effectively serves its intended purpose.	Saudi Arabia

<p>Saudi Arabia requests the following amendments to be taken into consideration:</p> <ul style="list-style-type: none"> • In section 4.2.1.1, a note shall be added: <p>“<u>Note 1</u>: For foods in joint presentation, the list of ingredients for each food shall be headed or preceded by the name of the food, followed by the term "ingredient". The same applies to multi-packaged foods whose secondary packaging does not allow the list of ingredients of the units to be displayed inside”</p> <ul style="list-style-type: none"> • In section 8.1.4 the following shall be added (In the case of food in joint presentation in different condition, the content of each of the products comprising this presentation and the total net content must be indicated.) • In section 4.6 the following notes shall be added: <p><u>Note 1</u>: Prepackaged foods in joint and multi-pack presentations must indicate the identification of the batch in each of the foods that compose them in such a way as to allow the traceability of the packer.</p> <p><u>Note 2</u>: When the secondary packaging does not allow the batches to be displayed in the units inside the multipack, a sticker system may be used if it is guaranteed that it is impossible for the multipack to be removed without breaking the multipack.</p> <p>In addition, Saudi Arabia believes that additional sections of the rule could benefit from amendments. Specifically, the inclusion of detailed warnings and disclaimers is crucial. Any relevant warnings, such as those pertaining to food safety, allergens, or specific dietary requirements, should be prominently displayed to ensure consumer safety and awareness. Moreover, detailed usage or preparation instructions should be included for each food item within the joint presentation or multipack. If items are intended to be consumed together or used in a specific manner, this should be explicitly stated to guide consumers appropriately. Additionally, it is important to declare the nutrition facts, especially on pre-packaged foods in multi-pack presentations, particularly when the secondary packaging is opaque and makes the nutrition facts unreadable.</p> <p>These amendments would enhance consumer protection and clarity, aligning with our commitment to food safety and quality standards.</p>	
<p>SA position:</p> <ul style="list-style-type: none"> • South Africa is of the opinion that the text is ready for advancement to the step process, taking note of the comments submitted for consideration. <p>Rationale:</p> <ul style="list-style-type: none"> • The text contains clear and appropriate requirements regarding prepackaged foods in joint presentation and/or multipack formats that will assist consumers to make informed choices without being misled, and to also increase harmonization and facilitate trade. <p>SA position:</p> <ul style="list-style-type: none"> • South Africa supports the proposed amendments to GSLPF in Appendix II of CX/FL 24/48/8. <p>Rationale:</p> <ul style="list-style-type: none"> • It is our opinion that the proposed amendments are very clear and appropriate to address requirements regarding prepackaged foods in joint presentation and multipack formats, and it also provides a good representation of the consensus in the EWG. 	<p>South Africa</p>

<ul style="list-style-type: none"> • Labelling of multipack formats and joint presentation will assist in providing consumers with clear information about the product, for them to make informed choices and to avoid confusion. <p>Specific comments:</p> <p>2. Definition of terms</p> <p>South Africa suggests the addition of the following amendments on the definitions of “multipack format and joint presentation”, due to its omission and also to improve readability.</p> <ul style="list-style-type: none"> • "Multipack format" means a presentation that is made up of a secondary outer container, and contains two or more units of the same or different prepackaged foods, which are intended to be consumed separately. Note: For example, small packages of French fries of different flavors in a larger package. • "Joint presentation" means a presentation consisting of an outer container that contains two or more units of food of different nature, which may be supplemented or mixed for consumption. Note: For example, yogurt and cereal. <p>Section 8.1.3.2</p> <ul style="list-style-type: none"> • 8.1.3.2 The name and address of the product seller, importer, exporter or packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from that of the manufacturer, packer, importer or exporter of the inside products. <p>Rationale:</p> <ul style="list-style-type: none"> • The outer packaging of the joint presentation and multipack should contain the name and address of the seller, importer, exporter or packer if different to that of the manufacturer, packer, importer or exporter of the inside products to ensure that clear and transparent information is provided to the consumers. <p>Section 8.1.3.3</p> <ul style="list-style-type: none"> • The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the earliest date marking. This does not exempt each of the individual products that make up the presentation from having their respective date marking. 	
Uruguay considera que debe continuar la discusión.	Uruguay
<p>The United States believes further discussion at CCFL48 is needed regarding the proposed amendments to the GSLPF by the EWG as well as the amendments proposed by the United States and other members before recommending advancement in the step process.</p> <p>The United States appreciates the efforts of Colombia on this work to clarify the applicability labeling provisions to products in multipack or joint presentation. The United States can support solutions that are as simple and clear as possible to meet the goals of this work. As such, the United States concurs with the approach proposed by New Zealand and suggests amending the General Standard on the Labelling of Prepackaged Foods by adding clear and unique definitions for both multipack and joint presentation formats. Second, we recommend including a specific reference for both multipack and joint presentation in Section 8 of the GSLPF. This would reduce or eliminate the need to develop additional language on ingredients, date marking, and other topics. The United States believes this approach will streamline the work and better facilitate movement toward consensus.</p>	USA

<p>Regarding the definitions, the United States would support the following proposed definitions:</p> <ul style="list-style-type: none"> • Multipack – A prepackaged food containing more than one inner package of the same or similar foods, where the inner packs of food are intended to be consumed separately. For example, small packs of different flavored crisps in a larger pack. • Joint presentation - A prepackaged food containing more than one type of food intended to be eaten together. For example, yogurt and cereal. <p>The United States would support the following proposed amendments to Section 8 of the GSLPF:</p> <ul style="list-style-type: none"> • 8.1.3.1 Where the package for sale is a multipack, the outer package shall carry the required labelling information for each type of inner package unless the labels of all types of inner packages are readily legible through the outer pack. Where labels of inner packages are not visible, this information should be presented separately for the different inner packages and identified as such or summed and presented for the total contents of the outer pack. Where the outer pack contains all the required labelling for the inner packs, the inner packs only require labelling with allergen declarations (where appropriate) or other warnings as deemed necessary by national authorities. • 8.1.3.2 Where the package for sale is a joint presentation, the outer package should be labelled with the required labelling information for the complete contents of the package. 	
SPECIFIC COMMENTS	MEMBER / OBSERVER
DEFINITION OF TERMS	
<p>Item 4: Mandatory Labelling of prepackaged foods</p> <p>4.5 Country of Origin & Country of Harvest</p> <p>The country of harvest shall be declared for agricultural, herbs and spices products, since omission would mislead or deceive the consumer.</p> <p>Definition of “Harvest “ be added same as the glossary of terms for spices and culinary herbs by CCSCH:</p> <p>“Harvest” : The act or process of gathering crops.</p>	Iran
<p>ICGA appreciates the efforts to develop specific definitions for distinguishing better sales in multipacks format or through joint presentations. Should examples to remain as notes in the documents, ICGA suggests adding examples that may refer to foods consumed as a treat, or for other wellness purposes than simply for a "nutritional" purpose, such as chewing gum assortments.</p>	ICGA
<p>Egypt supports the proposed version of the amendments to the definitions of “container” and “prepackaged” to include multipack formats and joint presentations.</p> <p>Egypt supports the proposed version to the definitions of multipack formats and joint presentations for more clarification.</p>	Egypt
<p>Indonesia agrees with the proposed definitions of “Container”; “Prepackaged”; “Joint presentation”, and “Multipack format”.</p>	Indonesia
Container	

<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p> <p>Thailand does not support any modification to the definition of "container" since it is by itself clear and cover the joint presentation and multipack formats. Modification of this wide-used term may unintentionally affect various Codex texts.</p>	Thailand
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p> <p>To provide clarity Australia can support the addition of 'multipack formats or joint presentations' to the definitions for 'container' and 'prepackaged' however we note the definition of "container" says "multipack formats or joint presentations" while the definition of "prepackaged" says "joint presentation and multipack formats". To be consistent, we propose both definitions should have the same order of the terms i.e. multipack format and/or joint presentation. We also propose 'formats' can be removed from 'multipack formats'</p>	Australia
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p> <p>New Zealand does not consider this amendment is necessary.</p>	New Zealand
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages of the same or different nature to be consumed together or separately, when such is offered to the consumer, such as multipack formats or joint presentations.</p>	European Union
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p> <p>FIA does not support the revised definition. We believe that the current definitions adequately cover different package forms without listing them specifically.</p>	Food Industry Asia
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p> <p>Canada does not consider it necessary to change the definition of container to include these examples. The definition of container already indicates that it includes various types of packaging. We are proposing to include the term container is part of the multipack format and joint presentation definitions, which would make it clear that they are captured by the definition of container.</p>	Canada
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.</p>	Paraguay

<p>Se sugiere la expresión siguiente: “Envase”, cualquier recipiente que contiene alimentos para su entrega como un producto único, que los cubre total o parcialmente, y que incluye los embalajes y envolturas. Un envase puede contener varias unidades o tipos de alimentos preenvasados cuando se ofrece al consumidor, incluyendo los formatos en envases múltiples o presentaciones conjuntas.</p>	
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, <u>such as multipack formats or joint presentations</u>.</p> <p>We don't see a need for the extension of the definitions for 'container' and for 'prepackaged'; there is no apparent clarification coming from these extensions.</p>	FoodDrinkEurope
<p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, <u>such as multipack formats or joint presentations</u>.</p> <p>For consistency with the title, we suggest keeping the order of the terms as “joint presentation and multipack formats”. We note that the definition of “container”, says “multipack formats or joint presentations,” while the definition of “prepackaged” says “joint presentation and multipack formats.”</p>	ICBA
Prepackaged	
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats</u>.</p> <p>Thailand does not support any modification to the definition of “prepackaged” since the modification of this wide-used term may unintentionally affect various Codex texts.</p> <p>If a link of prepackaged to the new terms is considered needed, Thailand proposes 2 approaches for EWG consideration:</p> <ol style="list-style-type: none"> 1) to include “Joint presentation” and “Multipack format” as sub-sections to the “Prepackaged” with indication that these two are the types of “Prepackaged” OR 2) maintain the sections as the WG proposed with a footnote to the term “Prepackaged” stating that “prepackaged may be offered as one package, joint presentation or multipack formats. 	Thailand
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats and joint presentations</u>.</p> <p>As noted above Australia proposes the definitions for 'container' and 'prepackaged' should have the same order of the terms i.e. multipack format and/or joint presentation. We also propose 'formats' be removed from 'multipack formats'</p>	Australia
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats</u>.</p> <p>New Zealand considers “prepackaged” includes both multipacks and foods in joint presentation and therefore no amendment to the definition to explicitly include these formats is necessary. To specifically list these formats as examples may cause confusion as to whether formats</p>	New Zealand

not listed are intended to be captured by the definition or not. We therefore support deleting the proposed amendment to the definition of prepackaged as above.	
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats.</u></p> <p>FIA does not support the revised definition. We believe that the current definitions adequately cover different package forms without listing them specifically.</p>	Food Industry Asia
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes. <u>including joint presentation and multipack formats.</u></p> <p>Canada does not support changing the definition of prepackaged. The existing definition already refers to the product being in a container, and as the proposed definitions of multipack format and joint presentation include the term container, they are automatically included in prepackaged, and this amendment is unnecessary.</p>	Canada
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats.</u></p> <p>De acuerdo con la propuesta</p>	Paraguay
<p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes <u>including joint presentation and multipack formats.</u></p> <p>We don't see a need for the extension of the definitions for 'container' and for 'prepackaged'; there is no apparent clarification coming from these extensions.</p>	FoodDrinkEurope
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>Jamaica thinks the definition below is adequate</p> <p>Is a presentation that consist of a secondary container that contains two or more units of food of different nature, individually prepackaged and labeled or tagged together (they have a single label that lists the foods that compose it), which are complemented or mixed for consumption.</p>	Jamaica
Joint presentation	
<p><u>"Joint presentation" means a consisting of an outer container that contains two or prepackaged food containing more units than one type of food of different nature intended to be eaten together. For example, which are supplemented or mixed for consumption, yogurt and cereal.</u></p> <p>Regarding a definition for "joint presentation", the United States would support the following proposed definition:</p> <ul style="list-style-type: none"> Joint presentation - A prepackaged food containing more than one type of food intended to be eaten together. For example, yogurt and cereal. 	USA
<u>"Joint presentation" means a presentation consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u>	India

India suggests to modify the definition, by including word 'presentation', for clarity	
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>South Africa suggests the addition of the following amendments on the definitions of joint presentation, due to its omission and also to improve readability.</p> <p>"Joint presentation" means a presentation consisting of an outer container that contains two or more units of food of different nature, which may be supplemented or mixed for consumption. Note: For example, yogurt and cereal.</p>	South Africa
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>Thailand seeks clarification whether "joint presentation" include the food like instant noodles with seasoning sachet(s), instant rice porridge, instant rice soup. If these are not included, it would be useful to provide additional note specifying that instant noodles and the food of similar type are not considered as joint presentation.</p> <p>In our view, instant noodles and the food of similar type should be excluded from "joint presentation" since in a joint presentation, the different units of food are usually of different natures (like yogurt and cereal, which are distinct items meant to complement each other when mixed or eaten together). In the case of instant noodles, both the noodles and seasoning sachet are part of a single dish; they are meant to be combined to create one cohesive meal.</p> <p>The formulation of instant noodles or other foods with similar format is designed to be consumed together as a single unit of food. They have to be mixed and consumed together otherwise it will be the product as indicated on the label. The seasoning is not for consumption itself. In contrast to yogurt and cereal, which are the example of "joint presentation", they are supplementing each other and can be consumed separately as desired.</p> <p>Therefore the food such as instant noodles with seasoning sachets can be considered as single food and follow the current requirements of CXS 1-1985 without the need to follow the additional labelling requirements proposed for joint presentation.</p> <p>In addition, Thailand finds the definition of "joint presentation" causes confusion and more examples would be beneficial.</p>	Thailand
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>We appreciate the work to streamline and differentiate these two definitions and suggest that more examples could be provided.</p>	International Confectionery Association
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature intended to be eaten together. For example, which are supplemented or mixed for consumption, yoghurt and cereal.</u></p> <p>As the definition for 'prepackaged' is proposed to include multipack format and joint presentation we support simplifying these definitions by referring to prepackaged as follows:</p> <p>Joint presentation means a prepackaged food containing more than one type of food intended to be eaten together. For example, yogurt and cereal.</p>	Australia

<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>New Zealand offers the following simplified wording for this definition:</p> <p>Joint presentation - A prepackaged food containing more than one type of food intended to be eaten together. For example, yogurt and cereal.</p> <p>New Zealand suggests the definition of "joint presentation" aligns with the definition of "multipack format" regarding the use of the terms 'prepackaged' (or 'outer container') and 'inner package'. This will more clearly emphasise how this format differs from that of multipack format. We do not support the use of the word "supplemented" within this definition as this can have multiple meanings.</p>	New Zealand
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>FIA supports the replacement of "secondary container" with "outer container" and the alignment with the proposed wording in the definition of "multipack format" such that the differences in the definition are more clearly highlighted.</p> <p>FIA suggests retaining the word "presentation" to align with the wording for "multipack format" and for grammatical correctness. We also view that there is a need to clarify that the units within the multipack are individually packed. Furthermore, the term "supplemented" is unclear and we propose replacing it with "complementary" or "accompanying".</p> <p>We propose the wording as:</p> <p>"Joint presentation" means a presentation consisting of an outer container that contains two or more individually packed and labelled units of food of different nature, which are complementary supplemented or mixed for consumption.</p> <p>Note: For example, yogurt and cereal.</p>	Food Industry Asia
<p><u>"Joint presentation" means a consisting of an outer container of prepackaged food that contains is sold as a single unit and that consists of two or more individual units of food of different nature, which are supplemented intended to be combined or mixed for consumption.</u></p> <p>Canada proposes some modifications to the joint presentation definition to improve clarity and in recognition that some joint presentations may not have an outer container but could be multiple units attached together and sold as a single unit. Canada also recommends the term "combined" instead of supplemented for clarity.</p>	Canada
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>We do not see a need for creating specific provisions for prepacked foods are seen a 'joint presentation' and thus for a definition of 'joint presentation' as this is fully covered in above (amended) definition for 'multipack format' and in the definitions for 'prepackaged' and 'container'. Especially products like meal-kits with multiple indivual components are fully in the scope and definitions of the current text of the GSLPF.</p>	FoodDrinkEurope
<p><u>"Joint presentation" means a consisting of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.</u></p> <p>We recommend using the word "complemented" instead of "supplemented," as it is more relevant to the situation.</p>	ICBA

<p><u>"Presentación conjunta": Presentación conformada por un envase exterior que contiene dos o más unidades de alimentos de diferente naturaleza, los cuales se complementan o mezclan para su consumo.</u></p> <p>El texto de la nota de la definición de "presentación conjunta" podría incluirse en el texto principal entre paréntesis.</p> <p>"Presentación conjunta": Presentación conformada por un envase exterior que contiene dos o más unidades de alimentos de diferente naturaleza, los cuales se complementan o mezclan para su consumo. Nota: (Por ejemplo, yogurt y cereales).</p>	Colombia
<p>"Envase", cualquier recipiente que contiene alimentos para su entrega como un producto único, que los cubre total o parcialmente, y que incluye los embalajes y envolturas. Un envase puede contener varias unidades o tipos de alimentos preenvasados cuando se ofrece al consumidor, <u>como, por ejemplo, los formatos en envases múltiples o presentaciones conjuntas.</u></p> <p>Argentina desea expresar que colocar ejemplos en una norma no es una buena práctica, considerando que pueden no estar incluyendo la totalidad de los ejemplos alcanzados.</p> <p>Asimismo, en coherencia con el título, se sugiere mantener el orden de los términos como "formatos de presentación conjunta y envases múltiples". En este sentido, se observa que la definición de "envase", dice "formatos en envases múltiples o presentaciones conjuntas", mientras que la definición de "preenvasado" dice "presentaciones conjuntas y los envases múltiples".</p>	Argentina
Multipack format	
<p><u>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>Jamaica agrees with essence and proposes the following</p> <p>Is a presentation that consists of a secondary sales container, opaque or transparent, specially designed to contain and display two or more units of the same or different prepackaged food, each of them labeled or tagged individually.</p>	Jamaica
<p><u>"Multipack format" means means a prepackaged food containing more than one inner package of the same or similar foods that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which where the inner packs of food are intended to be consumed separately. For example, small packs of different flavored crisps in a larger pack.</u></p> <p>Regarding a definition for "multipack", the United States would support the following proposed definition:</p> <ul style="list-style-type: none"> • Multipack – A prepackaged food containing more than one inner package of the same or similar foods, where the inner packs of food are intended to be consumed separately. For example, small packs of different flavored crisps in a larger pack. 	USA
<p><u>"Multipack format" means that a presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>India suggests to delete the word 'that' from definition as this is redundant & revise the definition as below:</p>	India
<p><u>"Multipack format" means means a prepackaged food containing more than one inner package of that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged foods similar foods, which where the inner packs are intended to be consumed separately. For example small packs of different flavoured crisps in a larger pack.</u></p>	Australia

<p>As the definition for 'prepackaged' is proposed to include multipack format and joint presentation we propose to simplify these definitions by referring to prepackaged as follows:</p> <p>Multipack means a prepackaged food containing more than one inner package of the same or similar foods, where the inner packs of food are intended to be consumed separately. For example small packs of different flavoured crisps in a larger pack.</p>	
<p><u>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>New Zealand suggests the following simplified definition of "multipack format":</p> <p>Multipack – A prepackaged food containing more than one inner container of the same or similar foods, where the inner containers of food are intended to be consumed separately. For example small packs of different flavoured crisps in a larger pack.</p> <p>We consider this simplifies the text, highlights what is unique about multipack format and still captures the intent of the proposed definition. In English, it is more appropriate for the example to refer to 'crisps' rather than 'French fries'.</p> <p>If reference to "outer container" is retained in the proposed definition for "joint presentation", we recommend this is also used in the definition of "multipack format".</p>	New Zealand
<p><u>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>FIA supports the revised definition which provide clearer distinction between the two terms. However, we view that the amendments is needed to clarify that the units within the multipack are individually packed. Additionally, the phrase "different flavours" in the given examples should be removed as it may suggest that different types of the same product is a necessity.</p> <p>We propose the wording as:</p> <p>"Multipack format" means that presentation that is made up of a secondary outer container and two or more individually packed and labelled units of the same or different prepackaged food, which are intended to be consumed separately.</p> <p>Note: For example, small packages of French fries of different flavors in a larger package.</p>	Food Industry Asia
<p><u>"Multipack format" means a container of prepackaged food that presentation that is made up of sold as a secondary outer container single unit and that consists of two or more individual units of the same or different prepackaged-packaged food, which are intended to be consumed separately.</u></p> <p>Canada suggests some modifications to the multipack format definition to improve clarity and in recognition that some multipacks may not have an outer container but could be multiple units attached together and sold as one. We also suggest removing "pre" from "prepackaged food" when referring to the individual units, as these units may not meet the GSLPF definition of prepackaged (since they may not be ready to offer to the consumer).</p>	Canada
<p><u>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>De acuerdo con la propuesta, ya que la misma define claramente la definición desarrollada</p>	Paraguay

<p><u>"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.</u></p> <p>We suggest to take out "that presentation that is made up of" in the "Multipack format" definition:</p> <p>"Multipack format" means a secondary outer container with two or more units of the same or different prepackaged food, which are intended to be consumed separately.</p>	FoodDrinkEurope
<p><u>Note: For example, small packages of French fries of the same or different flavors in a larger package; small packages of assorted sweets in a larger package.</u></p>	Thailand
<p><u>Note: For example, small packages of French fries potato chips/crisps of different flavors in a larger package.</u></p> <p>Canada suggests changing the example from French fries to potato chips/crisps as these are more likely to be found in multipack format.</p>	Canada
<p><u>Note: For example, small packages of French fries of different flavors in a larger package.</u></p> <p>We are wondering if this example meant "potato chips," which more commonly come in small packages of different flavors within a larger package.</p>	ICBA
<p><u>"Envases múltiples": Presentación que está conformada por un envase exterior que contiene dos o más unidades de alimentos preenvasados iguales o diferentes, que están destinados a ser consumidos por separado.</u></p> <p>El texto de la nota de la definición de "envase múltiple" podría incluirse en el texto principal entre paréntesis.</p> <p>"Envases múltiples": Presentación que está conformada por un envase exterior que contiene dos o más unidades de alimentos preenvasados iguales o diferentes, que están destinados a ser consumidos por separado Nota: (Por ejemplo, paquetes pequeños de patatas fritas de diferentes sabores en un paquete más grande.)</p>	Colombia
<p><u>Note: For example, yogurt and cereal.</u></p> <p>South Africa suggests the addition of the following amendments on the definitions of "multipack format, due to its omission and also to improve readability.</p> <p>"Multipack format" means a presentation that is made up of a secondary outer container, and contains two or more units of the same or different prepackaged foods, which are intended to be consumed separately. Note: For example, small packages of French fries of different flavors in a larger package.</p>	South Africa
<p><u>Note: For example, yogurt and cereal, tuna spread and cracker.</u></p>	Thailand
<p><u>Nota: Por ejemplo, yogurt y cereales.</u></p> <p>Argentina desea expresar que colocar ejemplos en una norma no es una buena práctica a incluir, considerando que pueden no estar incluyendo la totalidad de los ejemplos alcanzados.</p> <p>Asimismo, se señala que, en la traducción al inglés, dice "suplementado" en vez de "complementado". En la versión de inglés, se recomienda utilizar la palabra "complementado" en lugar de "suplementado", ya que es más relevante a la situación.</p>	Argentina

<p><u>Note: For example, yogurt and cereal.</u></p> <p>Added a period.</p>	Canada
<p><u>Nota: Por ejemplo, paquetes pequeños de patatas fritas de diferentes sabores en un paquete más grande.</u></p> <p>Se propone incluir “y/o incluye”, dado que la presentación en envase múltiple podría utilizarse o no para exhibir el producto, por lo que corresponde incluir los términos “y/o” en la redacción.</p> <p>Con relación al ejemplo citado habría que dilucidar si este ejemplo se refiere a las “papas de bolsa” o “potato chips” en inglés, que normalmente vienen en paquetes pequeños de diferentes sabores dentro de un paquete más grande o a otro producto.</p>	Argentina
8. PRESENTATION OF MANDATORY INFORMATION	
<p>Perhaps this section 8 would require to be presented in a different manner, i.e., to identify common labelling aspects to foods in multipack formats and in joint presentations, as well as possible specific provisions applicable to them individually, for further clarity.</p>	ICGA
<p>3/ On the proposed additional provisions in section 8 Presentation of mandatory information</p> <p>The EUMS are of the opinion that the proposed additional provisions:</p> <ul style="list-style-type: none"> - Cause confusion and uncertainty: they can be interpreted as only the name of the food, the list of ingredients and the name and address of the product packer having to be indicated on the “outer packaging of joint presentations and multipack formats” when the “container is opaque and does not allow such information to be viewed on the food it contains” - Add complexity: they introduce specific labelling requirements for “joint presentations” or “multipack formats”, which do not apply to other prepacked foods offered in individual packages. These additional provisions would create a new framework, specific to “joint presentations” and “multipack formats” and would put in question the applicability of other provisions of the GSLPF to such products (e.g. the provisions on special conditions for storage or on instruction for use). <p>Considering the above comments, the EUMS consider that following modifications are sufficient to clarify further that “multipack formats” and “joint presentations” are included in the scope of the GSLPF and that the mandatory labelling particulars shall either be on the wrapper or be readily legible through the wrapper / not obscured by it:</p> <p>"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages of the same or different nature to be consumed together or separately, when such is offered to the consumer."</p> <p>"8.1.3 Where the container is covered by a wrapper, either the wrapper shall carry the necessary information, or the label on the container or the labels on the different units or types of packages of the container shall be readily legible through the outer wrapper or not obscured by it".</p>	European Union
<p>8.1 General</p> <p>The United States prefers a more streamlined approach with solutions that are as simple as possible to achieve the goal of the work. As such, the United States does not support the proposed amendments but would support the following additions to section 8:</p>	USA

<ul style="list-style-type: none"> 8.1.3.1 Where the package for sale is a multipack, the outer package shall carry the required labelling information for each type of inner package unless the labels of all types of inner packages are readily legible through the outer pack. Where labels of inner packages are not visible, this information should be presented separately for the different inner packages and identified as such or summed and presented for the total contents of the outer pack. Where the outer pack contains all the required labelling for the inner packs, the inner packs only require labelling with allergen declarations (where appropriate) or other warnings as deemed necessary by national authorities. 8.1.3.2 Where the package for sale is a joint presentation, the outer package should be labelled with the required labelling information for the complete contents of the package. 	
<p>8.1 General</p> <p>While New Zealand supports requirements specific to the presentation of mandatory information for multipack formats and joint presentation being in section 8, we do not support the proposed new clauses. We consider that the proposed clauses 8.1.3.1, 8.1.3.2 and the footnote to 'name' in 8.1.4 are not necessary as the current clauses 8.1.2 and 8.1.3 already ensure mandatory information is visible under normal conditions of purchase and use.</p> <p>We believe the requirements for presentation of mandatory information for these packaging formats should be achieved through inclusion of two overarching clauses that relate to the presentation of all required labelling, one addressing requirements for multipacks and another addressing requirements for foods sold in joint presentation.</p> <p>New Zealand proposes the following clauses to replace the proposed subclauses 8.1.3.1, 8.3.1.2, 8.3.1.3 and the proposed footnotes to 8.1.4:</p> <p>8.1.3.1 Where the package for sale is a multipack, the outer container shall carry the required labelling information for each type of inner container unless the labels of all types of inner containers are readily legible through the outer container. Where labels of inner packages are not visible, this information should be presented separately for the different inner packages and identified as such or summed and presented for the total contents of the outer pack. Where the outer pack contains all the required labelling for the inner packs, the inner packs only require labelling with allergen declarations (where appropriate) or other warnings as deemed necessary by national authorities.</p> <p>8.1.3.2 Where the package for sale is a joint presentation, the outer package should be labelled with the required labelling information for the complete contents of the package.</p>	<p>New Zealand</p>
<p>8.1 General</p> <p>Egypt does not support the specific new sections proposed to the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985), except for the definitions of container, prepackaged, joint presentation and multipack format under Section 2 and the section about net content. Egypt believes that the current text of the GSLPF adequately addresses the requirements proposed in this consultation for prepackaged foods, including those using these types of presentations.</p> <p>For clarity, avoidance of confusion and prevention of repetition, Egypt supports the version of item no. 8.1.3, and no. 8.1.4 with two footnotes and deletion of clause 8.1.3.1, 8.1.3.2 and 8.1.3.3 due to the multipack formats and joint presentations clearly defined in the definition clause and already included in the definitions of "container" and "prepackaged" which are covered by the scope of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and therefore all general requirements and mandatory information apply to them</p>	<p>Egypt</p>
<p>8.1.3</p>	

<p>8.1.3. Where the container is covered by a wrapper, the wrapper shall carry the necessary information <u>mandatory requirements of this standard</u> or the label on the container shall be readily legible through the outer wrapper or not obscured by it.</p> <p>'necessary information' is subject to interpretation. Therefore, for clarity, India proposes this change, which is in alignment with GSLPF text.</p>	India
<p>8.1.3. Where the container is covered by a wrapper, <u>either</u> the wrapper shall carry the necessary information or the label on the container <u>or the labels on the different units or types of packages of the container</u> shall be readily legible through the outer wrapper or not obscured by it.</p>	European Union
<p>8.1.3. FIA believes that the sections 8.1.3 and '3. GENERAL PRINCIPLES' of the GSPLF adequately address these requirements. Therefore, the newly introduced sections 8.1.3.1 to 8.1.3.3 are unnecessary.</p>	Food Industry Asia
<p>8.1.3 Se sugiere modificar el texto de la siguiente manera: “Cuando el envase este cubierto por una envoltura opaca, en esta deberá figurar toda la información de la etiqueta de sus componentes internos. Por otro lado, cuando el envase este cubierto por una envoltura transparente, está deberá permitir leer fácilmente la información de la etiqueta de sus componentes internos”.</p> <p>Cuando el envase este cubierto por una envoltura opaca, en esta deberá figurar toda la información de la etiqueta de sus componentes internos. Por otro lado, cuando el envase este cubierto por una envoltura transparente, está deberá permitir leer fácilmente la información de la etiqueta de sus componentes internos”.</p>	Colombia
<p>8.1.3 Cuando el envase esté cubierto por una envoltura, en esta deberá figurar toda la información neecesaria <u>obligatoria</u>, o <u>debe permitir que la etiqueta aplicada al información obligatoria de cada</u> envase deberá poder pueda leerse fácilmente a través de la envoltura exterior e <u>y</u> no deberá estar oscurecida por ésta.</p>	Uruguay
8.1.3.1	
<p>8.1.3.1 <u>The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p> <p>In Sections 8.1.3.1 - 8.1.3.3, Thailand proposes to include these requirements to the respective sections of CXS 1-1985, i.e., Section 4.2 List of ingredients, Section 4.4 Name and address, and Section 4.7 Date marking and storage instructions; otherwise, it should be separated to improve readability.</p>	Thailand
<p>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</p> <p>Australia considers the proposed text in Section 8 can be simplified and does not need to provide separate provisions for the specific labelling requirements but rather can be generic for each format/presentation.</p> <p>We therefore do not support proposed sections 8.1.3.1, 8.1.3.2 or 8.1.3.3.</p> <p>Our proposed alternate text for 8.1.3.1 is:</p> <p>8.1.3.1 Where the package for sale is a multipack, the outer package shall carry the required labelling information for each type of inner package unless the labels of all types of inner packages are readily legible through the outer pack. Where labels of inner packages are not visible, this information should be presented separately for the different inner packages and identified as such or summed and presented for</p>	Australia

<p>the total contents of the outer pack. Where the outer pack contains all the required labelling for the inner packs, the inner packs only require labelling with allergen declarations (where appropriate) or other warnings as deemed necessary by regional or national authorities.</p>	
<p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p> <p>New Zealand does not support the inclusion of proposed clause 8.1.3.1. New Zealand considers the requirement for information to be displayed on the outer pack if information on the inner pack is not visible (due to opaque packaging or any other reason) is already adequately covered by 8.1.2 and 8.1.3 and there is no need for a subclause to 8.1.3 specifically related to the ingredients list.</p> <p>8.1.3.1 Where the package for sale is a multipack, the outer container shall carry the required labelling information for each type of inner container unless the labels of all types of inner containers are readily legible through the outer container. Where labels of inner packages are not visible, this information should be presented separately for the different inner packages and identified as such or summed and presented for the total contents of the outer pack. Where the outer pack contains all the required labelling for the inner packs, the inner packs only require labelling with allergen declarations (where appropriate) or other warnings as deemed necessary by national authorities.</p>	<p>New Zealand</p>
<p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p> <p>Canada suggests that it is not necessary to have an individual provision on the presentation of each mandatory labelling requirement in Section 8. Canada also suggests that Section 8 be limited to including information on presentation of mandatory information, while Section 4 should be used to specify any particulars about the mandatory information that is must be provided in the case of multipack formats and joint presentation. Canada recommends deleting text specific to lists of ingredients from Section 8 and addressing it in Section 4.2.1 as proposed above.</p>	<p>Canada</p>
<p><u>8.1.3.1 The list-Where the container is a multipack format or in joint presentation, the label of ingredients must be included that container shall carry the necessary information, unless the information on the outer packaging-label of the individual units that make up the multipack format or joint presentation is readily legible and multipack format, when-discernible through the packaging is opaque-outer package and does-not allow such information to be viewed on the food it contains.-obscured by it.</u></p> <p>Canada suggests that rather than having an individual provision for each labelling requirement relating to multipacks and joint presentation in Section 8, that one general provision on the availability of the labelling information for these types of container is sufficient. This provision mirrors section 8.1.3 respecting wrappers.</p>	<p>Canada</p>
<p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains-consumer, regardless of transparent or opaque packaging, to enable clarity and ease in reading all necessary information.</u></p> <p>Indonesia proposes to add packaging that is either transparent or opaque as the final package of the food that is traded to consumers must include mandatory labeling information as follows:</p>	<p>Indonesia</p>
<p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p> <p>De acuerdo con la propuesta</p>	<p>Paraguay</p>

<p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p> <p>We suggest modifications of paragraph 8.1.3.1 to remove the reference for joint presentations and a provision for a list of ingredient per units present, as follows:</p> <p>8.1.3.1: Multipack format products that contain different food units need to provide the list ingredients of each type in a separate list, clearly marked for the food unit it concerns.</p>	FoodDrinkEurope
<p>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</p> <p>ICBA believes that Sections '8.1.3 PRESENTATION OF MANDATORY INFORMATION', "4.2 List of ingredients" and "3. GENERAL PRINCIPLES" of the GSLPF sufficiently cover the ingredient list. Therefore, we do not support the addition of section 8.1.3.1</p>	ICBA
<p><u>8.1.3.1 La lista de ingredientes deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene.</u></p> <p>Se considera importante establecer a qué ejemplos se refiere en cada caso para lograr entender con mayor detalle en qué casos aplicaría y en qué casos no y evaluar si amerita describir cada caso en particular.</p>	Argentina
<p>8.1.3.1 La lista de ingredientes deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene.</p> <p>Uruguay entiende que esa comprendido en el punto anterior.</p>	Uruguay
8.1.3.2	
<p><u>8.1.3.2 The name and address of the product packer manufacturer, packer, importer or exporter, as appropriate, must be included on the outer packaging of foods presented in joint presentations and or in multipack formats or both when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p> <p>With regards to 8.1.3.2, ICGA suggests the following substantive changes: "The name and address of the manufacturer, packer, importer or exporter, as appropriate, must be included on the outer packaging of foods presented in joint presentations or in multipack formats or both when the container is opaque and does not allow such information to be viewed on the food it contains."</p> <p>The proposed editorial changes aim at being closer to the wording used in the General Standard (GSLPF - CXS 1) and provide for a bit more clarity in cases information is not visible due to the opacity of the outer package so that this key information be present on the outer package to help in product tracing.</p>	ICGA
<p><u>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p> <p>South Africa suggests the following amendments to section 8.1.3.2:</p>	South Africa

<p>8.1.3.2 The name and address of the product seller, importer, exporter or packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from that of the manufacturer, packer, importer or exporter of the inside products.</p> <p>Rationale:</p> <ul style="list-style-type: none"> The outer packaging of the joint presentation and multipack should contain the name and address of the seller, importer, exporter or packer if different to that of the manufacturer, packer, importer or exporter of the inside products to ensure that clear and transparent information is provided to the consumers. 	
<p>8.1.3.2 8.1.3.2 The name and address of the product packer-manufacturer, packer, importer or exporter must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.-.</p> <p>We suggest the amendments to simplify provision 8.1.3.2 and make it easier to understand.</p>	<p>International Confectionery Association</p>
<p>8.1.3.2 8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.-</p> <p>As noted above, Australia considers the proposed text in Section 8 can be simplified and does not need to provide separate provisions for the specific labelling requirements but rather can be generic for each format/presentation.</p> <p>Our proposed alternate text for 8.1.3.2 is:</p> <p>8.1.3.2 Where the package for sale is a joint presentation, the outer package should be labelled with the required labelling information for the complete contents of the package.</p>	<p>Australia</p>
<p>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</p> <p>New Zealand does not support the inclusion of proposed clause 8.1.3.2. New Zealand considers the requirement for information to be displayed on the outer pack if information on the inner pack is not visible (due to opaque packaging or any other reason) is already adequately covered by 8.1.2 and 8.1.3 and there is no need for a subclause to 8.1.3 specifically related to the name and address of the supplier.</p> <p>8.1.3.2 Where the package for sale is a joint presentation, the outer package should be labelled with the required labelling information for the complete contents of the package.</p>	<p>New Zealand</p>
<p>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</p> <p>Canada suggests a specific provision on name and address is not necessary and can be deleted. Section 4.4 already indicates that the name and address shall be declared.</p> <p>The introduction of Section 4 indicates:</p>	<p>Canada</p>

<p>The following information shall appear on the label of prepackaged foods as applicable to the food being labelled, except to the extent otherwise expressly provided in an individual Codex standard.</p> <p>As the new definitions of multipack format and joint presentation would clarify that these are prepackaged foods, the existing name and address requirements in Section 4.4 would automatically apply to manufacturer, packer, importer or exporter of these formats.</p>	
<p><u>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains consumer, regardless of transparent or when it is different from the manufacturer opaque packaging, packer, importer or exporter of the inside products to enable clarity and ease in reading all necessary information.</u></p> <p>Indonesia proposes to add packaging that is either transparent or opaque as the final package of the food that is traded to consumers must include mandatory labeling information as follows:</p>	Indonesia
<p><u>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p> <p>Se sugiere la redacción siguiente: El nombre y dirección del fabricante, envasador, importador o exportador de los productos deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene. La propuesta la realizamos teniendo en cuenta que la sugerencia propuesta da un mayor destaque al envasador.</p>	Paraguay
<p><u>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p> <p>Section 4.4 of the GSLPF clearly states that a commercially responsible person must be indicated on the sales unit. There is no need for additional granularity for a multipackage, just as there is no need for more detail for each ingredient in a compounded food product.</p>	FoodDrinkEurope
<p><u>8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p> <p>ICBA believes that current Sections '8.1.3 PRESENTATION OF MANDATORY INFORMATION', '4.4 Name and address' and '3. GENERAL PRINCIPLES' of the GSLPF sufficiently cover the 'name and address' of the manufacturer, packer, distributor, importer, exporter or vendor of the food. Therefore, we do not support the addition of section 8.1.3.2</p> <p>We also note that based on the summary of responses to the previous consultation, the majority of respondents did not agree with adding a subsection regarding the name and address of the product packer since the GSLPF clearly covers it. Therefore, we respectfully request the Chair and Co-Chair to take these suggestions into consideration and not propose including it under Section 8 or any other part of the GLSPF.</p>	ICBA
<p><u>8.1.3.2 El nombre y dirección del envasador del producto deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene, o cuando sea diferente al fabricante, envasador, importador o exportador de los productos al interior.</u></p>	Guatemala

<p>Para el inciso 8.1.3.1 y 8.1.33 este tema ya se aborda dentro de la Norma General, sin embargo, se puede apoyar la incorporación. Para el inciso 8.1.3.2 consideramos que el nombre y dirección importante a declarar en el embalaje exterior debe ser del responsable o titular del producto, ya que es quien es responsable y responde ante la autoridad sanitaria por lo que consideramos que este dato es más importante a declarar.</p>	
<p><u>8.1.3.2 El nombre y dirección del envasador del producto deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene, o cuando sea diferente al fabricante, envasador, importador o exportador de los productos al interior.</u></p> <p>Se sugiere modificar el texto de la siguiente manera: “El nombre y dirección del envasador del producto deberá incluirse sí el envase exterior de los envases múltiples o las presentaciones conjuntas no permiten visualizar dicha información o sí el envasador es diferente del fabricante, importador o exportador de los productos que están contenidos en el interior del envase exterior”</p> <p>El nombre y dirección del envasador del producto deberá incluirse sí el envase exterior de los envases múltiples o las presentaciones conjuntas no permiten visualizar dicha información, o sí el envasador es diferente del fabricante, importador o exportador de los productos que están contenidos en el interior del envase exterior”</p>	Colombia
<p><u>8.1.3.2 El nombre y dirección del envasador del producto deberá incluirse en el envase exterior de las presentaciones conjuntas y envases múltiples, cuando el envase sea opaco y no permita visualizar dicha información en los alimentos que contiene, o cuando sea diferente al fabricante, envasador, importador o exportador de los productos al interior.</u></p> <p>Uruguay entiende que el 8.1.3 comprende el nombre del fabricante, importador, exportador de acuerdo al ítem 4.4 de CXS 1-1985. El punto que no comprende es el nombre del envasador en el envase múltiple o quien arma la presentación conjunta.</p> <p>Por lo cual alcanzaria con indicar que debe indicarse el nombre del envasador en el envase multiple cuando sea diferente a la información correspondiente de los productos que contiene en el interior.</p>	Uruguay
8.1.3.3	
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>With regards to 8.1.3.3, ICGA would like to seek clarification about the use of “and/or” for the two types of presentations.</p>	ICGA
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>South Africa suggests the following amendments to Section 8.1.3.3</p> <ul style="list-style-type: none"> • The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the earliest date marking to completion. This does not exempt each of the individual products that make up the presentation from having their respective date marking. 	South Africa

<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>As per our comments above, Australia considers the proposed text in Section 8 can be simplified and does not need to provide separate provisions for the specific labelling requirements but rather can be generic for each format/presentation. See our proposed alternate text above for Sections 8.1.3.1 and 8.1.3.2</p>	Australia
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>New Zealand does not support the inclusion of proposed clause 8.1.3.3. It is New Zealand's view that if food in joint presentation is intended to be consumed together then the date mark should relate to the combination of products within the joint package. This would be the same for any other prepackaged food and therefore does not require any specific mention.</p> <p>For multipacks either the individual inner packs should have a date mark that is visible through the outer pack, or if this information is not legible through the outer package, then it should be provided on the outer package either for each type of inner package or for the total contents of the pack. This does not differ from requirements for other labelling elements and would be covered if New Zealand's proposed additions to section 8 are agreed, meaning no specific text is required at this clause. New Zealand could accept a note to our proposed sub-clause 8.1.3.1 to explain date marking of multipacks when one date mark is provided for the total contents of the multipack, such as:</p> <p>Note: where a single date mark is provided on the outer package for the total contents of a multipack that date mark should be shortest date mark for the inner packages.</p>	New Zealand
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>Canada suggests that Section 8 should be limited to information about the presentation and format of mandatory labelling information, while any specifics related to the requirements should be in Section 4. Therefore Canada recommends deleting this section and including this information in section 4.7 as outlined above in General Comments.</p>	Canada
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>Indonesia agrees with the proposed wording of Section 8.1.3.3 that the date marking on prepackaged foods in joint presentation and multipack formats shall be that of the product with the closest date to be fulfilled and this does not exempt each of the individual products that make up the presentation from having their respective date marking.</p>	Indonesia
<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>De acuerdo con la propuesta, refleja con claridad la indicación a ser considerada.</p>	Paraguay

<p><u>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</u></p> <p>There is no need to provide more granularity for a multipackage, just as there is no need for more granularity for each ingredient in a compounded food product.</p>	FoodDrinkEurope
<p>8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the closest date to be fulfilled. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</p> <p>ICBA believes that current sections '8.1.3 PRESENTATION OF MANDATORY INFORMATION', '4.7 Date marking and storage instructions' and '3. GENERAL PRINCIPLES' of the GSLPF sufficiently cover the date marking. Therefore, we do not support the addition of section 8.1.3.3</p>	ICBA
<p><u>8.1.3.3 El marcado de fecha en la envoltura exterior de los alimentos preenvasados en presentaciones conjuntas y/o en envases múltiples será la del producto con la fecha más próxima a su cumplimiento. Sin que esto exima de que cada uno de los productos individuales que componen la presentación cuenten con su respectivo marcado de fecha.</u></p>	Uruguay
8.1.4	
<p>8.1.4 The name* and net content** of the food shall appear in a prominent position and in the same field of vision.</p> <p>As per our comments above, Australia considers the proposed text in Section 8 can be simplified and does not need to provide separate provisions for the specific labelling requirements but rather can be generic for each format/presentation. See our proposed alternate text above for Sections 8.1.3.1 and 8.1.3.2.</p> <p>Australia doesn't not consider there is a need for the * note associated with 'name'</p> <p>In relation to net content, we propose to remove the ** note but are open to further discussion at CCFL48 on the need to include the proposed text either in section 8 or section 4.3 of the GSLPF.</p>	Australia
<p>8.1.4 The name* and net content** of the food shall appear in a prominent position and in the same field of vision.</p> <p>Indonesia proposes to add packaging that is either transparent or opaque considering our comment in section 8.1.3.1. To give flexibility, the number of units of the food in multipack formats should not be mandatorily included in the net content, so Indonesia proposes the wording in Section 8.1.4 and Note as follows:</p>	Indonesia
<p>8.1.4 The name* and net content** of the food shall appear in a prominent position and in the same field of vision.</p> <p>Please see explanation in the next comment.</p>	ICBA
<p>8.1.4 El nombre* y contenido neto** del alimento deberán aparecer en un lugar prominente y en el mismo campo de visión.</p> <p>consideramos que con lo establecido en la nota como en la descripción de contenido neto indicado en los 2 asteriscos (**) es compleja la declaración por el contenido de unidades debido a la variación de productos que puede contener un multipack, por ejemplo, se tiene un multipack de surtido, en el cual se incorporan 2 galletas (80g), 2 snacks de 52 g y otras 2 galletas de 75g, la declaración del contenido neto</p>	Guatemala

sería confusa para el consumidor y es información que los empaques individuales ya contienen, por lo que la sugerencia es que se pueda analizar y que en lugar que quede de manera mandatoria las empresas puedan escoger la mejor manera de declararlo.	
<p>8.1.4 El nombre* y contenido neto** del alimento deberán aparecer en un lugar prominente y en el mismo campo de visión.</p> <p>Se sugiere que el texto descrito para los símbolos “*” y “**” sean notas y no pies de página.</p>	Colombia
<p>8.1.4 El nombre* y contenido neto** del alimento deberán aparecer en un lugar prominente y en el mismo campo de visión.</p> <p>Uruguay considera que a partir de los cambios realizados en el 8.1.3 este punto quedaría comprendido en el mismo.</p>	Uruguay
<p>*It must be included in the outer packaging of the joint presentations-presentatios and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p> <p>We suggest one technical amendment in the provision above.</p>	International Confectionery Association
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p> <p>New Zealand does not support the inclusion of this proposed footnote. New Zealand considers the requirement for information to be displayed on the outer pack if information on the inner pack is not visible (due to opaque packaging or any other reason) is already adequately covered by 8.1.2 and 8.1.3 and there is no need for a footnote specifically requiring this for the name of the food in respect of multipack formats.</p>	New Zealand
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p> <p>FIA believes that the sections 8.1.3 and ‘3. GENERAL PRINCIPLES’ of the GSPLF adequately address the requirement. Therefore, the newly introduced footnote is unnecessary.</p>	Food Industry Asia
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p> <p>Rather than specify for each labelling requirement how the information should be legible, Canada proposes a broad provision in section 8.1.3.1 that would address the legibility of all of the labelling of a food in multipack format or joint presentation.</p>	Canada
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container-such is opaque-and does not-allow-offered to the names-consumer, regardless of the foods-it contains-transparent or opaque packaging, to be legible-enable clarity and ease in reading all necessary information.</p>	Indonesia
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p> <p>De acuerdo con la propuesta</p>	Paraguay
<p>*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p>	ICBA

<p>ICBA believes that existing Sections '8.1.3 PRESENTATION OF MANDATORY INFORMATION', '4.1 The name of the food' and '3. GENERAL PRINCIPLES' of the GSPLF sufficiently cover the name of the food regardless of the food presentation, so it is not necessary to have a specific section for multipacks and joint presentation. In fact, we note that the majority of respondents (with one exception) to the previous consultation did not support including this type of section.</p> <p>Therefore, we do not support the addition of the NAME and the corresponding note in 8.1.4: It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible.</p>	
<p><u>**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p> <p>New Zealand does not support the inclusion of this proposed footnote. New Zealand considers the requirement for information to be displayed on the outer pack if information on the inner pack is not visible (due to opaque packaging or any other reason) is already adequately covered by 8.1.2 and 8.1.3 and there is no need for a footnote specifically requiring this for the net contents in respect of multipack formats.</p>	New Zealand
<p><u>*In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p> <p>FIA supports the inclusion of additional net content requirements for multipack formats.</p>	Food Industry Asia
<p><u>**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p> <p>Canada suggests that Section 8 should be limited to information about the presentation and format of mandatory labelling information, while any specific related to the mandatory labelling requirements should be in Section 4. Therefore, Canada recommends deleting this provision and including similar information in section 4.3.4 as outlined above in General comments.</p>	Canada
<p><u>**In a multipack, the labelling should provide information on the net content and-with or without number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p>	Indonesia
<p><u>**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p> <p>De acuerdo con la propuesta</p>	Paraguay
<p><u>**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content.</u></p> <p>FoodDrinkEurope supports the proposed text.</p> <p>Instead of a footnote, we suggest an explicit provision for indication of net contents in a multipack format, and which provision allows for flexibility to encompass various scenarios:</p> <p>8.1.4.1. On a multipack format product, the labelling must provide net content and number of units information in way that net content of individual units and the number of units can be readily perceived. Preferably the multipack would indicate the total net contents .</p>	FoodDrinkEurope

<p>**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Preferably, the multipack would indicate the total net content. In that case, the number of units per type of food that make up the multipack should be indicated next to the net content. Example: 600ml (3 units of 200ml)</p> <p>We recommend replacing the word “must” with “should,” as Codex text do not tend to use the word “must.” Since this note is directly related to the sentence above, we suggest combining the two sentences to read as following:</p> <p>In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived. Optionally, the multipack could indicate the total net content. In that case, the number of units per type of food that make up the multipack should be indicated next to the net content. Example: 600ml (3 units of 200ml).</p>	ICBA
<p>Note: The number of units per type of food that make up the multipack must shall be indicated next to the net content. Example: 600ml (3 units of 200ml).</p> <p>India suggests replacing the word “must” with “shall,” as Codex texts do not tend to use the word “must.” Further, the proposal is in alignment with GSLPF text which uses the word ‘Shall’.</p>	India
<p>Note: The number of units per type of food that make up the multipack must be indicated next to the net content. Example: 600ml (3 units of 200ml).</p> <p>New Zealand could support this note. It aligns with New Zealand’s proposed subclause 8.1.3.1. on the presentation of mandatory information for multipacks.</p>	New Zealand
<p>Note: The number of units per type of food that make up the multipack must be indicated next to the net content. Example: 600ml (3 units of 200ml).</p>	Canada
<p>Note: The number of units per type of food that make up the multipack must may be indicated next to the net content. Example: 600ml (3 units of 200ml).</p>	Indonesia
<p>Note: The number of units per type of food that make up the multipack must be indicated next to the net content. Example: 600ml (3 units of 200ml).</p> <p>We suggest combining this with the previous sentence. Please see explanation to previous comment.</p>	ICBA