

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 7

CX/FL 24/48/7-Add.2

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

GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING (STEP 7)

Comments in reply to CL 2024/55-FL (After deadline)

Comments by ALAIAB, FIVS, the International Association of Consumer Food Organizations (IACFO)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/55-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>FIVS welcomes the opportunity to comment on these draft guidelines. FIVS is an international federation serving trade associations and companies in the wine industry from around the world. It provides a forum for its members to work collaboratively on legal and policy issues and communicates Federation views to national governments and international organisations.</p> <p>Once the points raised in text below are addressed, FIVS believes the text will be ready to advance to Step 8.</p>	FIVS
<p>We recommend including in this guideline a cross-reference to the “Guidelines on the Provision of Food Information for Pre-packaged Foods Offered Via E-commerce” since these two related sets of guidelines both address the provision of labeling information online</p>	The International Association of Consumer Food Organizations (IACFO)
<p>De acuerdo con el término audible. Por otro lado, ALAIAB solicita se elimine la sección 7.12, ya que no es lenguaje de uso común en CODEX la terminología relativa a costos.</p>	ALAIAB
SPECIFIC COMMENTS	
<p>5.2 FIVS would like to stress the need to be cautious about defining what is considered health and safety information. If the definition is too wide no information will be able to be provided exclusively using technology, making these guidelines obsolete.</p>	FIVS
<p>5.2 We recommend the following addition to 5.2: “Mandatory information, especially the name of the food, price, net quantity, and any and all food information concerning health and safety, <u>including but not limited to nutrition, ingredient, and allergen information</u>, should not be provided exclusively using technology.”</p> <p>This change is warranted to clarify which items at minimum must appear on the physical package and should not be provided exclusively using technology.</p>	The International Association of Consumer Food Organizations (IACFO)
<p>7.3 FIVS suggests maintaining the reference to commercial information to distinguish it from other regulated information that is not mandatory but that may appear on the e-label of wines such as harvest year, vintage, varieties. This would require a definition of commercial information to provide legal certainty to wine companies.</p>	FIVS
<p>7.3 Adicionalmente, se solicita la interpretación del numeral 7.3 del término ‘agrupados’ ya que hay información que si se coloca separada no hace sentido. Por ejemplo, una declaración nutricional que puede obligar a colocar en TN los datos sobre grasas monoinsaturadas y poliinsaturadas.</p>	ALAIAB
<p>7.3 We recommend adding an additional statement or section stating: “The consumer protections associated with use of a technology (such as a QR code) to provide labelling information should be no less than what they would be for any other online information.”</p>	The International Association of Consumer Food Organizations (IACFO)
<p>7.4 Con la misma intención de hacer la tecnología accesible a una amplia audiencia, también sugerimos hacer pequeños cambios en 7.4 y 7.7:</p>	ALAIAB

7.4. ...la información sobre los alimentos se <u>mostrará</u> ofrecerá conforme a los textos aplicables del Codex.	
7.5 We support this addition but emphasize the importance that it not be applied to any information regarding health and safety.	The International Association of Consumer Food Organizations (IACFO)
7.7 Con la misma intención de hacer la tecnología accesible a una amplia audiencia, también sugerimos hacer pequeños cambios en 7.4 y 7.7: 7.7. ...se mostrará proporcionará información suficiente en la plataforma tecnológica.	ALAIAB
7.8 FIVS would like to know what criteria would be used to deem that a reference on a label is self-explanatory or not. We believe this is confusing and that the purpose of e-labels is to simplify access to information for consumers and should not require additional accompanying text. Instead, Codex may want to consider recommending an international harmonised symbol for the term information. A relevant example is the existing ISO 7001 symbol which indicates where information is to be obtained.	FIVS
7.10 FIVS seeks clarification regarding what is meant by audible food information.	FIVS
7.10 We recommend that presentation of information in audio format be addressed in a separate sentence or section that reads "Food information described or presented using technology in audio format shall be audible to the consumer under normal settings and conditions of use of the technological platform. Sellers are encouraged to provide food information in both written and audio format." We recommend this change because, as written, information could be presented in audio format as an alternative to written format.	The International Association of Consumer Food Organizations (IACFO)
7.11 We recommend clarifying the importance that the technology used be suitable for the country in which the food is marketed by adding the following sentence to 7.11 "Additionally, the technology used to present food information shall be suitable based on local conditions, including which major technology platforms are available in that country and provide information in a manner that optimizes opportunities for time-efficient product comparisons, and include as many locally understood languages as practicable."	The International Association of Consumer Food Organizations (IACFO)
7.12 FIVS seeks further clarification regarding what would be considered an additional cost for the consumer. Is this meant to ensure that accessing the information will not include any additional costs? Could this include access to internet or ownership of a smartphone?	FIVS
[7.12 Cuando la información alimentaria se facilite utilizando tecnología, se hará sin costo adicional para el consumidor.] Por otro lado, ALAIAB solicita se elimine la sección 7.12, ya que no es lenguaje de uso común en CODEX la terminología relativa a costos.	ALAIAB
<u>[7.12- Where food information is provided using technology, it shall be provided without any additional costs for the consumer.]</u> We support the addition of 7.12 as written.	The International Association of Consumer Food Organizations (IACFO)