

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 5, 6, 7, 9, 11, and 13

FL48/CRD33

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Québec City, Québec, Canada

27 October - 01 November, 2024

(Comments from Ghana)

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

Ghana appreciates the work done by the eWG with Australia as Chair, on the revision of the provisions relevant to allergen labelling in the General Standard for the Labelling of Pre-packaged Foods and on the Guidelines on the Use of Precautionary Allergen Labelling.

Ghana supports advancement of the revision to step 8 provided consensus is reached on the outstanding issues. We however propose that a provision is made to allow regional and national authorities to add to the list of ingredients based on scientific justification.

#### Section 2 – Definition of ‘food allergen’

**Position:** Ghana supports proposed definition in option B.

**Rationale:** The second definition clarifies that the labelling applies to the food allergen not just the protein in the allergenic food. Again, the definition broader to cater for situations where there is cross contamination.

#### Section 4.2.1.6 – Exemptions

**Position:** Ghana supports the proposed text in the section.

**Rationale:** The text allows regional and national authorities to make informed decisions that will protect consumers. However, the provision prevents arbitrary decisions that are not based on risk assessment by subjecting the authority to exempt on meeting the criteria in the FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens

#### Section 4.2.1.7 – Sulphite

**Position:** Ghana supports the proposed text in the section as well as the footnote. With regards to the text in bracket (as offered to the consumer/as consumed) Ghana supports the first option “as offered to the consumer”

**Rationale:** The text aligns with JECFA’s risk assessment.

Section 8

**Position:** Ghana supports the proposed revision to sections 8.3.1, 8.3.2, and 8.3.2.1

**Rationale:** The revision ensures that consumers are provided with relevant information to protect health.

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

Ghana appreciates the work done by the eWG chaired by Australia and co-chaired by the United Kingdom and the United States of America. We support the advancement of the annex to the GSLPF to step 5 provided the committee can reach a consensus on the proposed texts in 4.2 and 4.3.

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

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

Ghana thanks the eWG for the comprehensive work done with the UK as the chair.

Ghana supports the advancement of the proposed guideline to the next step in the process provided the members reach consensus on the outstanding issues.

**Section 5.1**

**Position:** Ghana supports option A with the definition of durability.

**Rationale:** Prepackaged foods purchased via e-commerce should be delivered within a suitable consumption period which is either before the best-before or expiration date as indicated on the label. It is therefore crucial that consumers have access to information on whether the food will be delivered well in time before it expires or not suitable for consumption. Again, this will help in the decision making of the consumer.

**Section 5.3**

**Position:** Ghana supports the proposed text and support the removal of the square brackets.

**Rationale:** Prepackaged foods sold via e-commerce should provide the necessary information for the consumer to make an informed decision irrespective of the size of the food.

**Section 5.4**

**Position:** Ghana supports the removal of the square brackets

**Rationale:** The consumer should not incur extra cost for information necessary to make an informed decision.

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

Ghana thanks the Chair and Co-Chairs for the EWG report and revised draft guidelines. We agree that the guidelines are ready to advance to step 8 provided the committee is able to reach consensus on outstanding issues.

**Section 7.10**

Ghana supports in the inclusion of “audible” to the text. We however recommend that the audible presentation of information should not act as a replacement for information that should be provided in written form.

**Rationale:** Ghana recognizes that technology helps to provide additional forms of providing information to consumers. Providing audible formation will enable individuals with visual impairments to access food information.

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

Ghana recognizes the need to develop mandatory labelling requirements tailored to alcoholic beverages taking into consideration health/nutrition related information as well as restrictions on claims. We however, believe that the existing definition for food includes alcoholic beverages with the mention of drinks. There is no need to revise the definition of food to include alcoholic beverages.

We again support revising and amending existing Codex standards and related texts to include specific provisions to cover alcoholic beverages.

**AGENDA ITEM 11: TRANS FATTY ACIDS (TFAs)**

Ghana support Canada’s recommendation to defer discussions on Trans Fatty Acids to CCFL48

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

Ghana appreciates Costa Rica for the effort put in developing the Discussion paper. We support the establishment of a definition of added sugars.

**Rationale:** The use of no added sugar has become a trend in the labelling of food which has the potential of influencing health consumers’ decision to purchase a food product or not. It is therefore essential that consumers have accurate information about the nutrient content of the foods they buy.