

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4, 5.1, 12, 14

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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 Thailand)

Agenda Item 4: Consideration of labelling provisions in draft Codex standards (endorsement)

Draft standard for dried or dehydrated roots, rhizomes and bulbs – turmeric

Thailand does not object the endorsement of the labelling provision of the Draft standard for dried or dehydrated roots, rhizomes and bulbs – turmeric as proposed by CCSCH.

Thailand would like to draw attention of CCFL and CCSCH to the requirement of trade name specified in Table 1 of Section 2.1, Product Definition, which is linked to the Section 8.2.3 under the labelling provisions of this draft standard. We noted that currently, only one trade name, "Turmeric", is specified. However, in Thailand, trade names for turmeric vary depending on manufacturer, reflecting the diversity of varieties and cultivars with distinct benefits and applications.

We also note that CCSCH has successfully employed a flexible approach in the Standard for Dried or Dehydrated Chilli Pepper and Paprika (CXS 353-2022) to accommodate various trade names by specifying that the trade names are non-exhaustive list. We believe a similar approach could be considered for turmeric to ensure flexibility and avoid potential limitations on both domestic and international trade. This matter may be considered carefully before the adoption of this draft standard by the Commission.

Standard for Fish Oils (CXS 329-2017)

Thailand does not object the inclusion of labelling provision related to astaxanthin in calanus oil as proposed by CCFO28.

However, we noticed that the format of labelling provisions under Section 7 is not in line with the current format specified in the latest version of Procedural Manual and the format used in other Codex texts. For example, the paragraph under Section 7 Labelling should include the sentence, "In addition, the following specific provisions apply:". In addition, the provision of Labelling on non-retail containers should be changed to "The labelling of non-retail containers should be in accordance with the General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021). In addition, the following specific provisions apply:"

Draft Regional Standard for Castilla Lulo (Naranjilla)

Thailand does not object the endorsement of the labelling provision of the Draft Regional Standard for Castilla Lulo (Naranjilla).

Agenda Item 5.1: Revision to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985): Provisions relevant to allergen labelling

Thailand proposes amendment to Section 8.3 as follows:

8.3.21 The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or in a separate statement or in both.

8.3.1.1 ~~If The specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5~~ **are declared in the list of ingredients, the specified name for these foods and ingredients** shall be declared in a clear and distinct manner such as through the use of font type, style or colour that contrasts from the surrounding text.

~~8.3.2~~**1.2** If used the separate statement shall commence with the word 'Contains' (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present.

~~8.3.3~~**2** Where a food is exempt from declaring a list of ingredients, the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared, such as in a separate statement made in accordance with section 8.3.2.1.

~~8.3.4~~**3** For single ingredient foods, section 8.3.3 does not apply where foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 are declared as part of, or in conjunction with, the name of the food.

Agenda Item 12: Discussion Paper on Sustainability labelling claims

Thailand does not object this project document. Nevertheless, we propose to expand the scope of this project document to not only limit to the amendment of General guidelines on claims)CXG 1-1979(but also include any other approach like guidance document or information document. CXG 1-1979 is widely referenced; hence any amendments need careful consideration.

To avoid creating trade barriers or hindering progress towards sustainability, the scope and key aspects of this project document should be carefully considered. Sustainability claims are a valuable tool for manufacturers to communicate their products' environmental benefits to consumers. This work can harmonize labeling practices, increasing consumer awareness and trust in such claims.

While it is essential to prevent misleading claims, we must also ensure that sustainability claim requirements are practical and achievable to avoid discouraging progress towards sustainability in the agri-food sector. Easy-to-implement sustainability claim criteria can support the transformation of agri-food systems and contribute to global sustainability goals.

For example, in rice cultivation, practices like alternate wet and dry methods and proper fertilizer application can reduce greenhouse gas emissions. However, these practices may not significantly impact the overall sustainability of rice products when considering the entire supply chain from the life-cycle perspective. Without clear and achievable sustainability criteria, farmers may be discouraged from adopting such practices, hindering broader sustainability efforts.

To effectively promote sustainability, we propose developing sector-specific guidelines or principles. This approach will ensure that sustainability claims are both accurate and achievable, preventing consumer confusion while encouraging the adoption of sustainable practices in the agri-food sector.

Agenda Item 14: Discussion Paper on Future work and emerging issues

Thailand would like to express its concern regarding the proposed work on "high in" claim. In our view, the "high in" claim may inadvertently discriminate against certain foods that may contain high level of sodium or sugar naturally; or due to technological aspects to ensure food safety. In addition, consumers often associate "high in" claim with positive attributes, such as "high in calcium" or "high in vitamin C." Using this claim in a negative context could potentially mislead consumers.

While we recognize the importance of addressing public health related to non-communicable diseases)NCDs(and how "high in" claim may be beneficial, we believe that CCFL's existing work on front-of-package nutrition labeling, and the NRV-NCD established in CXG 2-1985, effectively addresses such concerns. In addition, given the current project document proposed, we suggest that the "high in" claim be put in the CCFL inventory list for future discussion once other pressing issues have been addressed.