

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4, 5.1, 7, 12, 14

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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 India)

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

- India supports endorsement of labelling provisions forwarded by CCSCH.

Rationale:

(1) The fifth session of CCSCH, while discussing the labelling provisions (8.3 and 8.3.1) of Country of origin/Country of harvest, on the clarification sought by the CCFL45, had agreed to keep both provisions in the standards and split “Country of Origin/Country of Harvest” into two independent and clear provisions, i.e. a provision on “Country of Origin” being mandatory and a provision on “Country of Harvest” being optional; and that **these provisions would be reconsidered in individual standards, should the need arise. The same was endorsed by the CCFL46.**

(2) Among all the spices and culinary herbs, Saffron is the most expensive spice produced in a few countries under specific geo-climatic conditions and this has a bearing on the quality of the spice. Because of this, the country of harvest becomes very important in case of saffron. It is just one part of the flower and hence its volume of production is very low compared to other spices and hence the high price. Due to its high value, it is more often subjected to adulteration and fraud.

(3) Specifying the country of origin and country of harvest will ensure the protection of the true origin and authenticity of this product and also prevent misbranding. This helps the consumer to make an informed choice without being misled.

Considering the above scenario, India would like to submit that keeping both the labeling provisions of country of origin and country of harvest as mandatory in the standard of saffron is warranted, and is also consistent with the decision taken in CCSCH5 about assessing the need for these provision based on specific needs of SCH standards.

Further, as outlined in the report of CCSCH7, India supports for the endorsement of labelling provision for saffron.

- India has following concerns regarding the labelling provisions forwarded by CCLAC, w.r.t. draft regional standard for Castilla Lulo from CCLAC:
 - General Standard for Labeling of Non-Retailer Container (CXS 346-2021) under section 5.5 already covers the requirements proposed under ‘Section 7.2.1 Identification’. Therefore, section 7.2.1 seems to be redundant. Further the word ‘dispatcher’ is not clear, as word ‘distributor’ has already been mentioned in NRC.
 - Further, ‘Section 7.2.2 Nature of Produce’ specifies that name of the produce has to be given if the contents are not visible from the outside, which is also a requirement covered under section 5.1. Therefore, purpose of this section is not clear.

Agenda Item 5.1: Revision to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985): Provisions relevant to allergen labelling (Step 7)

India appreciates the work done by the EWG Chair Australia and co-chair United Kingdom and United States of America in drafting food allergen labelling.

India agrees to provide advice to CCFH to ensure consistency with the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020).

Agenda 5.1:

- Regarding section 4.2.1.6, India would like to state that Part 4 reference already includes the list of current accepted exemptions. There is no need to provide a list of exemptions in the GSLPF (or elsewhere), or alternatively to reference the 'current accepted exemptions' as examples.
- Regarding Section 4.2.1.7 regarding sulphite declaration, India supports "as offered to consumer".

Rationale: "as offered to consumer" is clear compared to 'as consumed' and would also include the 'instruction for use'. The term 'as consumed' is subjective as it is left to the consumer.

Agenda Item 7: Guidelines on the Use of Technology to Provide Food Information: Amendment to the General Standard for the Labelling of Prepackaged Foods

India appreciates the work done by the EWG Chair Canada in preparing these guidelines.

(a) the addition of [audible] in section 7.10

India supports this addition as it expands the scope to cater to the visually challenged consumers for whom reading is difficult. However, the word 'or' before audible should be carefully used. This should only be an additional option and not a replacement to the mandatory printed/visual information. Therefore, India proposes to amend the section as following:

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

b) the new provision on costs in section 7.12 to align with the work on e-commerce

India supports this provision as it would ensure that the burden is not passed on to the consumer. However, for clear interpretation, India would like to suggest modification as below:

*Where food information is provided using technology, ~~it~~ **such information** shall be provided without any additional costs for the consumer.*

India supports advancement of the text to step 8 with minor modifications as suggested above.

Agenda Item 9: Discussion paper on Labelling of Alcoholic Beverages

India appreciates and supports the work done by WHO for drafting discussion paper

Agenda Item 10: Discussion paper on Food labelling exemptions in emergencies

India appreciates and supports the work done by United States of America for drafting discussion paper on Food labelling exemptions in emergencies

Agenda Item 13: Discussion paper on Sugar Labelling - definition for 'added sugars'

India supports further work on development of definition. Regarding the recommendations, India would like to suggest following:

- Incorporation of definition in the CXG 2-1985, as this text includes other definitions also. Therefore, including definition of 'added sugar' here would be most appropriate.
- The added sugar should be included in the list of nutrients to be declared.
- The declaration of added sugars should be mandatory as it would help consumers to make informed choice.