

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 5.1, 5.2, 6, 7, 8, 10, 13

FL48CRD21

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 Indonesia)

#### Agenda Item 2: Matters referred to the Committee by the Codex Alimentarius Commission and/or its subsidiary bodies

Indonesia supports that the labelling provision for the country of harvest in the Standard for dried floral parts – saffron should be voluntary.

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

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO ALLERGEN LABELLING</b> (revisions to GSLPF are presented as <b>bolded</b> additions and <del>strikethrough</del> deletions)  CL 2024/53-FL</p>	<p><b>INDONESIA COMMENT</b></p>
<p><b>2. DEFINITION OF TERMS</b></p> <p><b>“Food allergen”</b> means a food or ingredient <del>for substance or processing aid</del> <b>including a food additive or processing aid</b> usually <b>containing</b> a protein or protein derivative, that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals.</p> <p>OR</p> <p><b>“Food Allergen”</b> means a food (including ingredients, food additives and processing aids) that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, usually caused by a protein or protein derivative in the food.</p>	<p>The proposed alternative definition (second option) includes food additives, however, it needs clarification on that the definition of food allergen should include non-protein components such as sulphites, also known as allergens.</p> <p>Indonesia proposes the modification of the food allergen’s definition to make clearer that sulphite is included, as follows:</p> <p><b>“Food Allergen”</b> means a food (including ingredients, food additives and processing aids) that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, usually caused by a protein or protein derivative <u>or other substances (such as sulphite)</u> in the food.</p>
<p><b>4. MANDATORY LABELLING OF PREPACKAGED FOODS</b></p>	
<p><b>4.2.1.4</b> The following foods and ingredients are known to trigger food allergy or coeliac disease and shall always be declared</p>	<p>Considering the proposal to include ‘Gluten’ as a specified name in section 4.2.1.4, Indonesia seeks clarification on the implementation of the inclusion of gluten in the ingredient list, related to “gluten-free</p>

<p>using the specified name in addition to or as part of the ingredient name<sup>1</sup>:</p>		<p>claims” (refer to Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXS 118-1979)), as it is potentially contradictive that gluten is an allergen regardless of quantity.</p>
FOODS AND INGREDIENTS	SPECIFIED NAME	
Cereals containing gluten <sup>2</sup>		
– wheat and other <i>Triticum</i> species	‘wheat’	
– rye and other <i>Secale</i> species	‘rye’	
– barley and other <i>Hordeum</i> species and products thereof	‘barley’	
Crustacea and products thereof	‘crustacea’	
Eggs and products thereof	‘egg’	
Fish and products thereof	‘fish’	
Peanuts and products thereof	‘peanut’	
Milk and products thereof	‘milk’	
Sesame and products thereof	‘sesame’	
Specific tree nuts		
– Almond ( <i>Prunus amygdalus</i> )	‘almond’	
– Cashew ( <i>Anacardium occidentale</i> )	‘cashew’	
– Hazelnut ( <i>Corylus spp.</i> )	‘hazelnut’	
– Pecan ( <i>Carya illinoensis</i> )	‘pecan’	
– pistachio ( <i>Pistacia vera</i> )	‘pistachio’	
– walnut ( <i>Juglans spp.</i> ) and products thereof	‘walnut’	
<p>Section 4.2.1.6 – Exemptions CL 2024 53 Part A requested comments on section 4.2.1.6 (as below) and the proposed alternate text.</p> <p><b>4.2.1.6 Subject to evaluation using established criteria<sup>3</sup>, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared.</b></p> <p><b>Proposed alternate text</b></p> <p><b>[4.2.1.6 Subject to evaluation using established criteria<sup>7</sup>, Regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared. Such exemptions shall be subject to an evaluation that should</b></p>	<p>Indonesia does not support the wording of the proposed alternate text that a weight-of-evidence approach includes an exposure assessment. Indonesia is considering using the word “risk analysis” rather than “an exposure assessment” as it gives flexibility to the national authorities to establish an exemption. Therefore Indonesia proposes the alternate text as follows:</p> <p><b>Proposed alternate text</b></p> <p><b>[4.2.1.6 Subject to evaluation using established criteria<sup>7</sup>, Regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being</b></p>	

<sup>1</sup> In accordance with Section 4.1.1 of the *General Standard for the Labelling of Pre-packaged Foods* (CXS 1-1985), the ingredient declaration should specify the true nature of the food and be specific and not generic.

<sup>2</sup> Includes spelt, Khorasan, and other specific cereals containing gluten that are species or hybridized strains under the genus names of *Triticum*, *Secale* and *Hordeum*. Specified names are to be used according to the associated genus. Hybridized strains are to use specified names in conjunction from all of the parent genera (e.g. ‘wheat’ and ‘rye’ for triticale).

<sup>3</sup> **FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens <https://doi.org/10.4060/cc9554en>**

<p>follow a weight-of-evidence approach that includes an exposure assessment and other established criteria<sup>7</sup>.]</p>	<p>declared. Such exemptions shall be subject to an evaluation <b>that includes risk analysis</b> <del>that should follow a weight-of-evidence approach that includes an exposure assessment and other established criteria<sup>7</sup>.]</del></p>
<p><b>4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more<sup>4</sup> in a food [as offered to the consumer/as consumed] shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</b></p> <p>RENUMBER existing sections 4.2.1.5 and 4.2.1.6 to 4.2.1.8 and 4.2.1.9 respectively.</p>	<p>Indonesia proposes to open the square brackets and prefers the option “as consumed” as follows:</p> <p><b>Sulphite when present in concentrations of 10 mg/kg or more<sup>5</sup> in a food <del>[as offered to the consumer/as</del> consumed] shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</b></p>
<p><b>8. PRESENTATION OF MANDATORY INFORMATION</b></p> <p><b>8.3 Declaration of certain foods and ingredients</b></p> <p><b>8.3.1 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 shall be declared so as to contrast distinctly from the surrounding text such as through the use of font type, style or colour.</b></p>	<ul style="list-style-type: none"> <li>▪ Indonesia supports the revised text for sections 8.3.1</li> <li>▪ Indonesia supports the revised text for sections 8.3.2 and 8.3.2.1, with slight modifications as follows:                     <p><b>8.3.2 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 <del>or</del> and in a separate statement <del>or in both</del>.</b></p> <p><b>8.3.2.1 <del>If used</del> 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</b></p> </li> </ul>

**Agenda Item 5.2: Guidelines on the use of precautionary allergen labellingCX/FL 24/48/5 (Part B)**

Guidelines on the use of precautionary allergen labelling	INDONESIA COMMENT
<p><b>4. GENERAL PRINCIPLES</b></p>	
<p><b>4.2</b> The decision to use PAL shall be based on the findings of a risk assessment<sup>6</sup> of unintended allergen presence to determine potential exposure above a reference dose.</p>	<p>Indonesia considers the wording of Section 4.2 should be more explicit that a risk assessment includes qualitative as well as quantitative, to provide clarity and flexibility for food business operators that both approaches can be applied in the decision to use PAL.</p>

<sup>4</sup> Sulphite measured as the total concentration of sulphur dioxide (SO<sub>2</sub>) and sulphur dioxide equivalents.

<sup>5</sup> Sulphite measured as the total concentration of sulphur dioxide (SO<sub>2</sub>) and sulphur dioxide equivalents.

<sup>6</sup> FAO and WHO (2023). Risk assessment of food allergens – Part 3: Review and establish precautionary labelling in foods of the priority allergens (Sections 3.3.1 to 3.3.6). <https://doi.org/10.4060/cc6081en>

<p>4.3 PAL shall only be used if unintended allergen presence cannot be mitigated to a level at or below the action level<sup>7</sup> for a food allergen based on the reference doses in the table at 4.3.1.</p>	<p>Indonesia considers that it is essential to harmonize sections 4.2 and 4.3, as if a risk assessment includes qualitative as well as quantitative, PAL should not only be used based on the reference doses in table 4.3.1.</p>
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**Agenda Item 6: Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce**

Indonesia would like to thank the UK for preparing a discussion paper addressing some of the remaining aspects of the review of the Guidelines on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce.

A virtual working group (VWG) was convened before the CCFL48. The VWG Chair introduced the program for the working group and provided background documentation (Agenda Paper 6 CX/FL 24/48/6, Comments in Response to Circular Letter (CL) CL 2024/54-FL in CX/FL 24/48/6 – Add. 1, Summary of responses to CL 2024/54-FL).

Indonesia has previously sent comments as summarized on CX/FL 24/48/6 – Add. 1. Referred to FL48/CRD03 Indonesia would like to provide the following comments:

<p><b>GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PRE-PACKAGED FOODS OFFERED VIA E-COMMERCE</b></p> <p>(changes are in <b>bold/underline or strikethrough</b> mode)</p> <p><b>FL48/CRD03</b></p>	<p><b>INDONESIA COMMENT</b></p>
<p><b>1. PURPOSE</b></p> <p>The purpose of these guidelines is to ensure consumers buying pre-packaged foods via e-commerce have the information needed to make informed choices, similar to the information they would find on the physical label of the food <b><u>[as well as other considerations for pre-packaged foods offered for sale via e-commerce.]</u></b></p>	<p>Indonesia supports the text in square brackets and agrees to open the square brackets as follows:</p> <p>1.1 The purpose of these guidelines is to ensure consumers buying prepackaged foods via e-commerce have the information needed to make informed choices, similar to the information they would find on the physical label of the food {, as well as other considerations for prepackaged foods offered for sale via e-commerce.}</p>
<p><b>6. OPTIONAL <del>FOOD</del> INFORMATION PRIOR TO THE POINT OF E-COMMERCE SALE</b></p>	
<p><b>6.1</b> Section 7 of the <i>General standard for labelling of pre-packaged foods</i> (CXS 1-1985) is applicable to food information shown to consumers on the product information e-page for the pre-packaged food that is being offered for sale</p>	
<p><b><u>[6.2 A statement may be provided on the product information e-page prior to the point of e-commerce sale to inform the consumer about the seller’s policy on shipping their pre-packaged foods in relation to their date marking/best before, best quality before, use-by, or expiration date.]</u></b></p>	<p>Indonesia considers that an indication of durability of prepackaged food should be provided on the product information e-page considering that consumer has the right to get complete information regarding the product before purchasing the product.</p> <p>In section 5.1 (CL 2024/54-FL), Indonesia has previously proposed to delete the word “is encouraged to” and add</p>

<sup>7</sup> Action level (mg total protein from the allergen / kg food) = Reference dose (mg total protein from the allergen) / Amount of the food (kg). The amount of food should be established based a single eating occasion intake of the food preferably using the 50th percentile or mean of consumption data for the respective population(s) where available.

<b>GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PRE-PACKAGED FOODS OFFERED VIA E-COMMERCE</b> (changes are in <b>bold/underline or strikethrough</b> mode) <b>FL48/CRD03</b>	<b>INDONESIA COMMENT</b>
	<p>the word “should” on the first bullet of Section 5.1, and open the square brackets, as follows:</p> <p>Section 4 and Section 5 of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) except information required by 4.6 and 4.7.1; <del>{An indication of durability of prepackaged food is encouraged to</del> <b>should</b> be provided.} {For the purpose of this clause, “durability” means the period between the point of delivery and the best-before or use-by date in which the food retains its specific properties when properly stored.}</p>

#### Agenda Item 7: Guidelines on the use of technology to provide food information in food labelling

Indonesia would like to thank eWG chaired by Canada for developing the draft of Guidelines on the Use of Technology to Provide Food Information in Food Labelling. Indonesia would like to provide comments related to review the addition of [audible] in section 7.10 and the new provision on costs in section 7.12 to align with the work on e-commerce, as follows:

- a. Indonesia supports including reference to the information being audible as well as legible. Indonesia proposes the wording of section 7.10 as follows:

7.10 Food information described or presented using technology shall be clear, prominent, and readily legible, **with or without its audible version** ~~{or audible}~~ to the consumer under normal settings and conditions of use of the technological platform.

Indonesia considers that the food information should be mandatorily legible in any case. The audible version may be added in case of the use of technology in food labeling and does not replace the food information in legible form. Suppose it is allowed that the food information is solely presented in audible form/version, the consumer may have more obstacles to get the information, e.g. noisy situations, and dialect differences.

- b. Indonesia supports the wording of Section 7.12 and agrees to open the square brackets as follows:

{7.12 Where food information is provided using technology, it shall be provided without any additional costs for the consumer.}

#### Agenda Item 8: A mendments to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985): Provisions relevant to joint presentation and multipack formats

Indonesia would like to thank Colombia, as Chair of the EWG, that has revised the proposed draft text (CRD05), upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.

Furthermore, in response to the proposed draft text (CRD05), Indonesia would like to provide the following comments:

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b> (Proposed amendments to GSLPF are presented as <u>underlined and red</u>) <a href="#">CL 2024/56-FL</a></p>	<p><b>Proposed draft text (CRD05)</b> upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
<p><b>TITLE</b></p>	<p>Replace the term "MULTIPLE CONTAINERS" with "MULTIPACK" in the title of the document in Spanish DRAFT AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</p>	
<p><b>2. DEFINITION OF TERMS</b></p> <p><b>"Container"</b> 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><b>"Prepackaged"</b> 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><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><u>Note: For example, yogurt and cereal.</u></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,</u></p>	<p>Include the terms "joint presentation" and "multipack" in the definition of "Container"</p> <p><b>"Container"</b> means any packaging of food for delivery to the <b>consumer</b> 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 <b>of the same or different nature to be consumed together (joint presentation) or separately (multipack), when offered to the consumer, such as multi-pack formats or joint presentations.</b></p> <p><b>Clean version</b></p> <p><b>"Container"</b> means any packaging of food for delivery to the <b>consumer</b> 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 <b>of the same or different nature to be consumed together (joint presentation) or separately (multipack).</b></p> <ul style="list-style-type: none"> <li>- Delete the amendment to the definition of "prepackaged"</li> </ul> <p>"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for</p>	<p>Indonesia agrees with the proposed definitions (referred to document CL 2024/56-FL) of "Container"; "Prepackaged"; "Joint presentation", and "Multipack format"</p>

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b> (Proposed amendments to GSLPF are presented as <u>underlined and red</u>)  CL 2024/56-FL</p>	<p><b>Proposed draft text (CRD05)</b>  upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
<p><u>which are intended to be consumed separately.</u>  <u>Note: For example, small packages of French fries of different flavors in a larger package.</u></p>	<p>catering purposes <del>including joint presentation and multipack formats.</del></p> <ul style="list-style-type: none"> <li>- Remove separately definitions of the terms "joint presentation" and "multipack"</li> </ul> <p><del>"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. Note: For example, small packages of French fries of different flavors in a larger package.</del></p> <p><del>"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. Note: For example, yogurt and cereal</del></p>	
<p><b>8. PRESENTATION OF MANDATORY INFORMATION</b></p> <p><b>8.1 General</b></p> <p><b>8.1.3.</b> 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>Include an amendment to numeral 8.1.3</p> <p>8.1.3. Where the container is covered by <del>an opaque</del> wrapper, the wrapper shall carry the <del>necessary</del> <b>mandatory label</b> information <del>or the label on the container shall be readily legible through the outer wrapper or not obscured by it.</del> <b>of the unit(s) inside. If the wrapper is transparent, it must be easily readable.</b></p> <p><b>Clean version</b></p> <p><b>8.1.3</b> Where the container is covered by <del>an opaque</del> wrapper, the wrapper shall carry the mandatory label information <del>of the unit(s) inside. If the wrapper is transparent, it must be easily readable.</del></p>	<p>Indonesia considers that the wrapper, either transparent or opaque as the final package of the food that is traded to consumers, must include mandatory labeling information</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</u></p>	<p>Delete numeral 8.1.3.1:</p> <p><u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint</u></p>	<p>Referred to Indonesia's comment on CL 2024/56-FL, Indonesia proposes to add packaging that is either</p>

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b> (Proposed amendments to GSLPF are presented as <u>underlined and red</u>)  CL 2024/56-FL</p>	<p><b>Proposed draft text (CRD05)</b>  upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
<p><u>packaging is opaque and does not allow such information to be viewed on the food it contains.</u></p>	<p><del>presentation and multipack format, when the packaging is opaque and does not allow such information to be viewed on the food it contains.</del></p>	<p>transparent or opaque as the final package of the food that is traded to consumers must include mandatory labeling information as follows:  <u>8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and multipack format when such is offered to the consumer, regardless of transparent or opaque packaging, to enable clarity and ease in reading all necessary information.</u> <del>when the packaging is opaque and does not allow such information to be viewed on the food it contains.</del></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, or when it is different from the manufacturer, packer, importer or exporter of the inside products.</u></p>	<p>Numeral 8.1.3.2 is replaced by the following proposed text (hereinafter referred to as numeral 8.1.3.1)</p> <p><del>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.</del></p> <p><b>8.1.3.1</b> When the packer of the product in joint presentation or multipack formats is different from the manufacturer, packer, importer or exporter of the products inside, such packer name and address be included in the wrapper.</p>	<p>Referred to Indonesia's comment on CL 2024/56-FL, Indonesia proposes to add packaging that is either transparent or opaque considering our comment in section 8.1.3 as follows:  <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 such is offered to the consumer, regardless of transparent or opaque packaging, to enable clarity and ease in reading all necessary information.</u> <del>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.</del></p>

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b> (Proposed amendments to GSLPF are presented as <u>underlined and red</u>)  CL 2024/56-FL</p>	<p><b>Proposed draft text (CRD05)</b>  upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
<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>Numeral 8.1.3.3 is replaced by the following proposed text (thereinafter referred to as numeral 8.1.3.2)</p> <p><del>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 date closest to completion. This does not exempt each of the individual products that make up the presentation from having their respective date marking.</del></p> <p><b>8.1.3.2 The date marking on foods packaged in joint presentations and/or in multipack formats whose wrapper is opaque, shall be that of the product with the date closest to its completion. This does not exempt each of the units inside it from having its respective date marking.</b></p> <p><b>Justification:</b> The proposed adjustment to numeral 8.1.3 allows the elimination of numeral 8.1.3.1, since it is clarified that all the information on the label (including the list of ingredients) must appear on the container when the wrapper is opaque. Adjusting the text of numeral 8.1.3.2 and 8.1.3.3 reduces repetition in the text and makes it more concise and clearer.</p>	<p>Referred to Indonesia's comment on CL 2024/56-FL, Indonesia agrees with the proposed wording of Section 8.1.3.3 (hereinafter referred to as numeral 8.1.3.2) 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> <p>Furthermore, referred to Indonesia's comment on CL 2024/56-FL, Indonesia proposes to add packaging that is either transparent or opaque considering our comment in section 8.1.3 as follows:</p> <p><b>8.1.3.2 The date marking on foods packaged in joint presentations and/or in multipack formats whose wrapper is opaque <u>or transparent, to enable clarity and ease in reading all necessary information</u>, shall be that of the product with the date closest to its completion. This does not exempt each of the units inside it from having its respective date marking.</b></p>
<p><b>8.1.4</b> The name* and net content** of the food shall appear in a prominent position and in the same field of vision.</p>	<p><b>Proposed Change</b> Elimination of the amendment to numeral 8.1.4</p>	<p>Referred to Indonesia's comment on CL 2024/56-FL, Indonesia proposes to add packaging that is either transparent or opaque considering our comment in</p>

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXs 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b> (Proposed amendments to GSLPF are presented as <u>underlined and red</u>)  CL 2024/56-FL</p>	<p><b>Proposed draft text (CRD05)</b>  upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
<p><u>*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.</u></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><u><b>Note:</b> 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).</u></p>	<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><del>*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.</del></p> <p><del>**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.</del></p> <p><del><b>Note:</b> 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).</del></p> <p>Include a numeral to section 4.3 Net content</p> <p><b>4.3.4. In addition to the declaration of the net content, in the case of food packaged in multipack format, the net content of each unit and the number of units per type of food shall be indicated (Example: 600 ml (3 units of 200 ml)).</b></p> <p><b>Justification</b></p> <p>One member suggests that section 8 should be limited to information on the presentation and format of mandatory labelling information, while any specific information relating to mandatory labelling requirements should be included in section 4. This recommendation is very correct, as it clarifies doubts regarding the placement of the amendments. Therefore, the amendment to numeral 8.1.4 is</p>	<p>section 8.1.3. 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> <p><b>8.1.4</b> The name* and net content** of the food shall appear in a prominent position and in the same field of vision.</p> <p><u>*It must be included in the outer packaging of the joint presentations and multipack formats, when such is offered to the consumer, regardless of transparent or opaque packaging, to enable clarity and ease in reading all necessary information when the container is opaque and does not allow the names of the foods it contains to be legible.</u></p> <p><u>**In a multipack, the labelling should provide information on the net content 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> <p><u><b>Note:</b> The number of units per type of food that make up the multipack may must be indicated next to the net content. Example: 600ml (3 units of 200ml).</u></p>

<p><b>DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS</b>          (Proposed amendments to GSLPF are presented as <u>underlined and red</u>)  <a href="#">CL 2024/56-FL</a></p>	<p><b>Proposed draft text (CRD05)</b>          upon consideration of comments and recommendations received in response to CL 2024/56-FL as compiled in CX/FL 24/48/8-Add.1.</p>	<p><b>Indonesia comment to Proposed draft text (CRD05)</b></p>
	<p>eliminated and the text is adjusted to include it in section 4.3.4.</p>	

**Agenda Item 10: Discussion Paper on Application of food labelling provisions in emergencies**

Indonesia would like to thank the USA for preparing a discussion paper and project document on food labelling flexibilities in emergencies.

Referred to the Draft Guidelines on the Application of Food Labelling Measures in Emergencies (CX/FL 24/48/10 Appendix III), Indonesia would like to provide comments that have also been submitted on EWG Consultation Paper 2: Application of Food Labelling Provisions in Emergencies, as follows:

<p><b>Draft Guidelines Guidelines on the Application of Food Labelling Measures in Emergencies</b>  <b>CX/FL 24/48/10 Appendix III</b></p>	<p><b>Indonesia Comments</b></p>
	<p>General comments:            Indonesia would like to thank the United States for preparing the second discussion document of the electronic working group on flexibilities in the application of food labeling in emergencies.            Furthermore, Indonesia would like to propose that a reference should be made to the Codex Guideline CXG 19-1995 Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situation because these two documents are related.</p>
<p><b>Purpose</b>            The purpose of these guidelines is to provide guidance through general principles and decision-making criteria for the consideration and flexible application of food labelling requirements in emergencies that cause supply chain disruptions, and to ensure that the food labelling flexibilities applied by competent authorities in such emergencies are as harmonized and risk-based as possible to maintain food safety and fair trade in uncertain situations.</p>	
<p><b>Scope</b>            For the purposes of these guidelines, an emergency is understood to mean an exceptional and temporary event that causes</p>	<p><b>Scope</b>            For the purposes of these guidelines, an emergency is understood to mean an exceptional and temporary event that causes significant disruption to the international food</p>

<p align="center"><b>Draft Guidelines Guidelines on the Application of Food Labelling Measures in Emergencies</b></p> <p align="center"><b>CX/FL 24/48/10 Appendix III</b></p>	<p align="center"><b>Indonesia Comments</b></p>
<p>significant disruption to the international food supply chain, in whole or in part. Emergencies and consequent supply chain disruptions may occur due to human pandemics, animal disease outbreaks, natural disasters, disruption of critical infrastructure networks, war, or famine, as well as combinations of these and other scenarios. Such emergencies may be experienced globally or regionally and may prompt competent authorities to consider the flexible application of food labelling requirements to help maintain a safe and adequate food supply. For the purposes of these guidelines, such flexibilities are evidence-based derogations from food labelling requirements to the extent and for the periods strictly necessary to facilitate a safe and adequate food supply during an emergency, as determined by competent authorities.</p>	<p>supply chain, in whole or in part. Emergencies and consequent supply chain disruptions may occur due to human pandemics, animal disease outbreaks, natural disasters, disruption of critical infrastructure networks, war, or famine, as well as combinations of these and other scenarios. Such emergencies may be experienced globally <del>or</del> , regionally <u>or nationally</u> and may prompt competent authorities to consider the flexible application of food labelling requirements to help maintain a safe and adequate food supply. For the purposes of these guidelines, such flexibilities are evidence-based derogations from food labelling requirements to the extent and for the periods strictly necessary to facilitate a safe and adequate food supply during an emergency, as determined by competent authorities.</p> <p>Rationale:</p> <p>Indonesia considers that emergencies experienced nationally that have impact to international trade should be included.</p>
<p><b>Principles</b></p> <p>Competent authorities should consider the following principles regarding the application of food labelling requirements in an emergency:</p> <p><i>The General Principles of the General Standard on the Labelling of Prepackaged Food (CXS 1-1985), section 3.1-2, apply to these guidelines.</i></p> <p><u>Before an emergency occurs, competent authorities should:</u></p>	
<ul style="list-style-type: none"> <li>Review national legislation to determine what authorities are available to grant flexibilities in an emergency and, if no flexibilities could be offered in such emergencies, harmonize national legislation with these guidelines.</li> </ul>	
<ul style="list-style-type: none"> <li>Develop a transparent and risk-based plan for considering requests for food labelling flexibilities in times of emergency, indicating stakeholder responsibilities, procedures to be followed, as well as communication with the public and notification to affected countries. Such a plan should be part of an overall national food safety emergency plan.</li> </ul>	
<p><u>When identifying an emergency, and during an emergency, competent authorities should consider whether the event:</u></p>	
<ul style="list-style-type: none"> <li>Reveals that existing food labelling requirements, though effective under normal conditions, now compromise or otherwise</li> </ul>	

<p><b>Draft Guidelines Guidelines on the Application of Food Labelling Measures in Emergencies</b></p> <p><b>CX/FL 24/48/10 Appendix III</b></p>	<p><b>Indonesia Comments</b></p>
<p>negatively impact the availability of a safe and adequate food supply;</p>	
<ul style="list-style-type: none"> <li>• Demonstrates that flexibility in non-food safety or otherwise low-risk food labelling requirements will assist in mitigating the effects of the emergency on the availability of a safe and adequate food supply, and</li> </ul>	
<ul style="list-style-type: none"> <li>• Is exceptional and temporary in nature.</li> </ul>	
<p><u>Any flexibilities provided by the competent authority during an emergency should:</u></p>	
<ul style="list-style-type: none"> <li>• Not compromise food safety or introduce risks such as foods or ingredients that are known to cause hypersensitivity (e.g. allergen labelling);</li> </ul>	
<ul style="list-style-type: none"> <li>• Be tailored to proportionally address significant negative impacts resulting from the emergency, such as risk of shortage of a safe and adequate food supply, as demonstrated by the food business operator (FBO);</li> </ul>	
<ul style="list-style-type: none"> <li>• Be effective only for the period in which significant negative impacts are experienced, as demonstrated by the competent authority, FBO, or other stakeholders;</li> </ul>	
<ul style="list-style-type: none"> <li>• [Consider how products produced during the emergency that remain available for sale after the emergency is over should be addressed (i.e. stock in trade)];</li> </ul>	
<ul style="list-style-type: none"> <li>• Be based on an assessment of risk relative to the emergency, using all relevant, available information, including consideration of impacts on nutrition or health claims and whether any proposed substitute ingredients are already approved by the competent authority;</li> </ul>	
<ul style="list-style-type: none"> <li>• Arise from issues identified by FBOs and communicated to competent authorities;</li> </ul>	
<ul style="list-style-type: none"> <li>• Be [monitored and] supported by records kept by the FBO [and the competent authority] to support and document implementation of the flexibility, [and enable traceability]. [All records kept by the FBO should be made available to the competent authority.]</li> </ul>	<p>Be <b>monitored and</b> supported by records kept by the FBO to support and document implementation of the flexibility, made available to the competent authority <b>which enable product tracing</b>;</p> <p>Indonesia considers that traceability/product tracing should also included as an important principle in this guideline.</p>

<p align="center"><b>Draft Guidelines Guidelines on the Application of Food Labelling Measures in Emergencies</b></p> <p align="center"><b>CX/FL 24/48/10 Appendix III</b></p>	<p align="center"><b>Indonesia Comments</b></p>
<ul style="list-style-type: none"> <li>• Not provide undue competitive advantage to one or more FBOs over others;</li> </ul>	
<ul style="list-style-type: none"> <li>• Not apply to product exported to other countries, unless acceptance from the country or countries importing the product is confirmed by the competent authority.</li> </ul>	
<ul style="list-style-type: none"> <li>• Be communicated in a transparent manner, as far in advance as possible using all effective means, including the use of technology, to FBOs, trading partners, and consumers;</li> </ul>	
<ul style="list-style-type: none"> <li>• Leverage technology-based approaches where feasible to enhance the availability of food information to all appropriate stakeholders (i.e., FBOs, trading partners, consumers, and competent authorities);</li> </ul>	
<ul style="list-style-type: none"> <li>• Ensure continuity in the basic product information while providing flexibility in the means of communicating such information (e.g. temporary stickering, [in-store materials, use of technology in labelling, websites, accompanying documents]).</li> </ul>	
<ul style="list-style-type: none"> <li>• Not substantially change the basic nature of the product;</li> </ul>	
<ul style="list-style-type: none"> <li>• Be harmonized [across commodities, FBOs, and trading partners,] as far as possible, [and be applied to foods/food groups identified on the basis of the kind and nature of emergency.]</li> </ul>	<ul style="list-style-type: none"> <li>• Be harmonized {across commodities, FBOs, and trading partners,} as far as possible;</li> </ul>
<ul style="list-style-type: none"> <li>• Be notified to and coordinated with other countries, [leveraging international networks such as the International Food Safety Authorities Network (INFOSAN)]</li> </ul>	
<ul style="list-style-type: none"> <li>• Be considered as part of a broader national, regional, or international framework to enhance food supply chain resilience in emergencies.</li> </ul>	
<p><u>After an emergency, competent authorities should:</u></p>	
<ul style="list-style-type: none"> <li>• Evaluate the results of any flexibilities provided during the period of the emergency and adapt the country's food labelling emergency plan accordingly to promote resilience in future emergencies.</li> </ul>	

<p align="center"><b>Draft Guidelines Guidelines on the Application of Food Labelling Measures in Emergencies</b></p> <p align="center"><b>CX/FL 24/48/10 Appendix III</b></p>	<p align="center"><b>Indonesia Comments</b></p>
<ul style="list-style-type: none"> <li>Communicate to FBOs, countries, and the public that time-limited flexibilities offered during the emergency are no longer effective.</li> </ul>	
<p><b>Examples of flexibilities</b></p> <p>The following are non-exhaustive examples of flexibilities that competent authorities may choose to provide, when sufficiently demonstrated by the FBO as necessary to mitigate the effects of an emergency on a safe and adequate food supply:</p>	
<ul style="list-style-type: none"> <li>Labelling format flexibility and how the information was provided.</li> </ul>	
<ul style="list-style-type: none"> <li>Permit alternative ingredient lists for circumstances when an alternative approved food additive or ingredient was sourced, allowing formulation changes to be communicated through accompanying documents, websites, in-store materials, or stickering if labelling modification is not possible.</li> </ul>	
<ul style="list-style-type: none"> <li>Slight variations in nutrition information not reflected in nutrition information panels.</li> </ul>	
<ul style="list-style-type: none"> <li>Depletion of existing labelling stocks.</li> </ul>	<ul style="list-style-type: none"> <li><b><u>Permit utilization of alternative label due to</u></b> <del>d</del>Depletion of existing labelling stock</li> </ul> <p>Indonesia proposes to reword the sentence to make it clearer.</p>
<ul style="list-style-type: none"> <li>Provide flexibility around language labelling requirements, except for labelling requirements that impact health and safety, such as allergen labelling.</li> </ul>	
<ul style="list-style-type: none"> <li>Permit non-food safety labelling flexibilities to allow food made for catering purposes (e.g. hotels, restaurants, and institutions) to be sold at retail.]</li> </ul>	
<p>[Stakeholder Roles, Responsibilities/Processes]</p>	

### Agenda Item 13: Sugar Labelling - definition for 'added sugars'

In principle, Indonesia agrees that there needs to be harmonization regarding the definition of added sugar.

Indonesia is of the view that the definition of added sugar needs to be included in the Codex texts (Guidelines on Nutrition Labelling (CXG 2-1985) and the Guidelines for the Use of Nutrition and Health Claims (CXG 23-1997) considering that the codex texts are related to the definition of added sugar.

Regarding its inclusion in the nutritional value information, it needs to be considered that the nutrients listed in the nutritional value information must be proven by test results while the method of analysis to distinguish added sugar from sugar contained in the raw material does not yet exist.

The inclusion of added sugar in nutritional value information is voluntary and needs to consider the scope of food types that can include information regarding “no added sugar” so that the information is not misleading.

Considering that there are already claims related to “no added sugar”, the provisions on claims “no added sugar” need to be reviewed to be in line with the definition of no added sugar that will be drafted.