

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6 (CX/FL/19/45/6)

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

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PROPOSED DRAFT GUIDELINES ON FRONT-OF-PACK NUTRITION LABELLING

(Comments from Dominican Republic, El Salvador, Panama, Thailand, FoodDrinkEurope, FIVS, OIV)

DOMINICAN REPUBLIC

República Dominicana envió las observaciones en respuesta a la carta circular CL2019/14 FL y están contenidas en el documento CX/FL 19/45/6. ADD. 1, pero desea destacar los siguientes puntos :

1. **República Dominicana** sugiere en el artículo 2.2, **eliminar el párrafo siguiente** "Estas directrices también pueden utilizarse como una guía en el caso donde se muestra la información nutricional simplificada cerca de los alimentos (por ejemplo, etiquetas de estante o servicio de alimentos), para alimentos sin envasar o vendidos en línea (por ejemplo, información disponible en el punto de venta en sitios web)", ya que reiteramos lo expresado en el segundo borrador del documento, "consideramos que el ENPFE es para la información individual del consumidor , que debe estar en el envase del alimento y no cerca de los alimentos ni en estantes o servicio de alimentos.
2. En el artículo 4.2 no apoyamos la inclusión de "amplia gama de" y sugiere se **sustituya por "los consumidores"**.
3. En artículo 4.5 sugerimos se elimine el texto propuesto entre corchetes "sin necesidad de levantar el envase del alimento", por considerarla innecesaria.
4. En el artículo 4.6, **República Dominicana** solicita que la información entre corchetes se sustituya por "**políticas de salud y nutrición**". por considerarla pertinente.
5. En artículo 4.8, **República Dominicana** no está de acuerdo con la frase "o entre categorías", ya que sería motivo de malas interpretaciones por los consumidores. Por lo cual aceptamos se mantenga "dentro de las categorías"
6. En el artículo 4.9, considera adecuado se acepte la información del primer corchete y la eliminación del segundo corchete ya que sería innecesario.
7. En el artículo 4.12, **República Dominicana** acepta se mantenga la primera frase en el corchete "como se consume" y sugerimos que la segunda frase "vende con mínimas excepciones" sea eliminada.

EL SALVADOR

Ver documento CX/FL 19/45/6 Add. 1-rev 1, respuesta a la Carta Circular CL 2019/14-FL

PANAMA

Observaciones generales

Panamá respalda, valora y agradece este importante trabajo preparado por el GTE (documento de referencia: **CX/FL19/45/6**).

1. PROPÓSITO

Panamá está de acuerdo, en términos generales, con el propósito, considerando una mejora en su redacción de la siguiente manera:

Propuesta: Dar una orientación general para ayudar en el desarrollo del etiquetado nutricional en la parte frontal del envase, como una herramienta para facilitar la **elección de compra del** consumidor de alimentos

consistentes con la política nacional de salud y nutrición del país donde se implementa, **contribuyendo a mejorar la nutrición y alcanzar los objetivos de salud pública mundial, que incluye la reducción de la carga de enfermedades no transmisibles relacionadas con la dieta.**

2. ÁMBITO DE APLICACIÓN

Panamá apoya de manera general el ámbito de aplicación, pero hace la solicitud de que se mejore la redacción de la llamada 3 que se hacen mención en los puntos 2.2 y 2.3 del ámbito de aplicación.

2.2. Las bebidas alcohólicas y algunos alimentos para uso en regímenes especiales, **[incluidos los preparados para lactantes, los alimentos para lactantes y niños pequeños, los alimentos o bebidas deportivos]**, y los alimentos para usos médicos especiales están excluidos³.

2.3. Además, ciertos alimentos envasados pueden quedar exentos³ del ENPFE como:

- Alimentos con baja importancia nutricional por lo que se refiere a su composición como a las cantidades consumidas: por ejemplo, hierbas, especias, té y café simples a los que no se ha añadido ningún otro ingrediente.
- Alimentos en pequeñas unidades;

La llamada 3 señala: *Las exclusiones son alimentos que no deben tener un ENPFE. Las excepciones son aquellos casos en que los alimentos no tienen que tener un ENPFE, pero en caso de que la tengan, no afecta a su aplicación.*

Panamá sugerimos que se modifique la llamada la llamada 3, donde se menciona que **“las exenciones son aquellos casos en que los alimentos no tienen que tener un ENPFE, pero en caso de que la tengan, no afecta a su aplicación”, de la siguiente manera:**

“Las exclusiones son alimentos que no deben tener un ENPFE. Las exenciones son aquellos casos en que los alimentos no tienen que tener un ENPFE, pero en los casos de que los países consideren que deben tener un ENPFE deben contar con una normativa nacional o alguna política de alimentación y nutrición nacional, regional o internacional que lo sustente, no afectando a su aplicación”.

3. DEFINICIÓN DE ETIQUETADO NUTRICIONAL EN LA PARTE FRONTAL DEL ENVASE (ENPFE)

3.1. **Etiquetado nutricional en la parte frontal del envase (ENPFE)** es cualquier sistema que presenta información simplificada de nutrición en la parte frontal del envase⁶ de **alimentos preenvasados**.⁷⁷ Puede incluir símbolos y gráficos, texto o una combinación de estos, que proporcionen información sobre el valor nutricional global de los alimentos y/o los nutrientes que se incluirán en el ENPFE, como se describe en estas directrices.

3.2. Esta definición excluye:

- i. Declaraciones de propiedades de nutrición;
- ii. Declaraciones de propiedades de salud;
- iii. Etiquetado alergénico; y
- iv. La declaración cuantitativa de ingredientes.

Panamá considera conveniente evaluar y debatir más sobre la definición ENPFE propuesta, que abarca solamente a los alimentos preenvasados, con el propósito de **considerar un alcance más amplio** como **“una guía en el caso donde se muestra la información nutricional simplificada cerca de los alimentos (por ejemplo, etiquetas de estante o servicio de alimentos), para alimentos sin envasar o vendidos en línea (por ejemplo, información disponible en el punto de venta en sitios web)”**.

Justificación: Como ya lo hemos señalado, una buena parte de los alimentos hipercalóricos, hipersódicos y/o grasosos se presentan “no preenvasados” y se sirven “listos para el consumo” en muchos restaurantes, servicios de alimentación y establecimientos de “comida rápida”, contribuyen significativamente con la alta carga de enfermedades (crónicas) no transmisibles relacionadas con la dieta, lo cual es un grave problema mundial de salud pública, por lo que **también deberían ser abarcados por estas directrices y/o guías.**

4. PRINCIPIOS GENERALES

Panamá apoya, en términos generales, los **principios generales propuestos**; sin embargo, considera conveniente eliminar parcialmente el contenido entre corchetes, en 4.2 **[una amplia gama de]**, 4.5 **[sin necesidad de levantar el envase del alimento]**, y 4.6 **[orientaciones dietéticas...]**, y estaría de acuerdo con la eliminación de los corchetes en el resto.

4.1. Solo un sistema de ENPFE debería ser recomendado en cada país o región. Sin embargo, en caso de que un sistema de ENPFE coexista con otros sistemas, estos no deben ser contradictorios entre sí.

- 4.2. El ENPFE debe presentar información de manera que sea fácil de entender por ~~[una amplia gama de]~~ consumidores en el país donde se implementa. El formato del ENPFE debe estar basado en una investigación de mercado científicamente válida.
- 4.3. El ENPFE se deberá ofrecer solo como añadidura, y no en lugar, de la declaración de nutrientes.
- 4.4. El ENPFE debe ir acompañado de una concientización y programa de educación/información para incrementar la comprensión y uso del consumidor.
- 4.5. El ENPFE debe ser claramente visible en el envase en el punto de compra bajo condiciones normales de venta y uso ~~[sin necesidad de levantar el envase del alimento]~~.
- 4.6. El ENPFE debe estar alineado con ~~[orientaciones dietéticas/políticas de salud y nutrición]~~ nacionales basadas en la evidencia.
- 4.7. El ENPFE debe estar avalado por medidas objetivas de ~~[nutrientes de importancia mundial]~~ apoyadas por evidencias científicas válidas.
- 4.8. El ENPFE debe permitir a los consumidores realizar comparaciones ~~[dentro de las categorías o entre categorías]~~.
- 4.9. El ENPFE debe ser ~~[liderado por el gobierno, pero]~~ desarrollado en colaboración con todos los interesados, por ejemplo, ~~[el gobierno]~~, el sector privado, los consumidores, el sector académico y asociaciones de salud pública entre otros.
- 4.10. Debería ser objeto de seguimiento y evaluación para determinar la efectividad y la repercusión.
- 4.11. Debería aplicarse de una manera que fomente el uso en las etiquetas de los alimentos.
- 4.12. Debería ser calculado y aplicarse a los alimentos en consonancia con la declaración de nutrientes correspondiente de tal manera que represente la naturaleza del alimento ~~[como se consume/vende con mínimas excepciones]~~.

Justificación: Para lograr sencillez y mayor claridad.

5. OTROS ASPECTOS A CONSIDERAR EN EL DESARROLLO SISTEMAS DE ENPFE

Panamá apoya que el propósito, ámbito de aplicación y principios del ENPFE deben tener una armonización global, pero es de suma dejar claro que existen otros aspectos de importancia que deben permitir la flexibilidad de adaptaciones del mismo por las autoridades nacionales, según las necesidades del país o región que la implemente, relacionado todos los puntos:

- 5.1. Selección y desarrollo del sistema de ENPF: La selección y desarrollo del mismo debe estar basado en evidencia y las necesidades en la situación de salud sobre las ENT en los países que lo implementen.
- 5.2. Implementación del sistema de ENPFE: Opinamos “puede también considerarse (a nivel nacional e internacional) el potencial de aplicación de un sistema de ENPFE de manera más amplia que a los alimentos preenvasados.
- 5.3. Presentación de la información: Panamá apoya que la misma debe facilitar al consumidor su comprensión que lo guie en la elección de compra.
- 5.4. Programas de educación: Apoyamos la importancia que tiene la educación al consumidor y que la misma sea continua, pero resaltamos la importancia de los países de facilitar un presupuesto para ello.
- 5.5. Seguimiento y evaluación del sistema de ENPFE: Consideramos que la misma debe ser liderada por una autoridad del estado, que puede ser de salud, con la cooperación de diferentes sectores.

THAILAND

Thailand would like to thank Costa Rica and New Zealand for preparing this draft Guidelines.

Thailand supports the voluntary basis of this guidelines and agrees with the **purposes** of this document as FOPNL will help consumers in making informed choices for their food. FOPNL should be in line with the context of each country to ensure consumer’s understanding of the implemented scheme.

For **scope**, Thailand agrees in principle with the proposed scope. For Section 2.2, we propose deletion of the clause in the square brackets. Foods for young children should be opened for FOPNL so that parents can select appropriate food for their children whom at this age eat the same food as typical adult. For sport food and drinks, Thailand is of the opinion that it should not have FOPNL as it may cause confusion and misunderstanding to general consumers.

For **definitions**, it is crucial to clearly define FOPNL as it links to the scope of this draft document, hence its application. It could be beneficial for individual countries to develop FOPNL scheme according to its own national dietary and health policies. This would result in diversified practices and formats of FOPNL and thus at international level we are not sure if this could fulfil the objective of Codex on ensuring fair practices in the food trade.

With regards to the requests in **Sections 4 and 5**, Thailand has the following comments.

Principle 4.6

Thailand agreed with this principle and the retention of the clause in square brackets. Nonetheless, we propose to use “and/or” instead of just “/” for better clarification that countries can choose either or both of dietary guidance and health and nutrition policies. Therefore, this principle should be written as, FOPNL should align with evidence-based national {dietary guidance **and/or** health and nutrition policies}.

Principle 4.7

Thailand agrees that any underlying basis for FOPNL should be supported by scientific evidence and is of the view that the clause in square bracket should be retained.

Principle 4.8

Thailand is of the opinion that FOPNL enables consumers only to make comparisons between products within the same categories. For inter-categories comparison, it may be very difficult and may cause confusion and misleading to consumers. Therefore, we propose to amend Principle 4.8 to be, “FOPNL should allow consumers to make comparison { within categories ~~and/or between categories~~”.

Section 5

5.1 Thailand is of the view that the word, “global principles” has very wide scope. Thus to ensure clarification and reduce any misunderstanding, the principles of which FOPNL system shall be met should be clearly identified.

FOODDRINKEUROPE

SECTION	COMMENTS
1. PURPOSE:	
Provide general guidance to assist in the development of front-of-pack nutrition labelling, as a tool to facilitate the consumer's choice and understanding of food in line with international and/or national dietary guidelines.	FOP nutrition labelling is also meant to help consumers to better understand what is in their food. Clarification that FOP should be in line with international and/or national dietary guidelines.
2. SCOPE:	
2.1 These guidelines apply to front-of-pack nutrition labelling (FOPNL), whether on a voluntary or mandatory basis, used on pre-packaged foods ¹ that include a nutrient declaration, including where simplified nutrition information is displayed near the food (e.g. shelf-tags or food service) or where foods are sold online (e.g. information available at point of purchase or in websites). ²	It should be clarified that FOP nutrition labelling can be voluntary or mandatory. Either way, these guidelines are applicable. For reasons of consistency, we prefer the applicability of these guidelines directly to all forms of information provision. Rather than using the term "food service", it may be better to refer to "foods for catering purposes" (aligned with the General Standard on the Labelling of Prepackaged Foods).
2.2 Alcoholic beverages and certain foods for special dietary uses [including infant formula, foods for infants and young children, sports foods or drinks], foods for special medical purposes are excluded ³ .	FoodDrinkEurope supports the exclusion from the scope of these foods.
2.3 Additionally, certain prepackaged foods may be exempted ³ from FOPNL such as ⁴ : <ul style="list-style-type: none"> • foods with low nutritional significance in terms of both its composition and the quantities consumed: e.g. herbs, spices, plain tea and plain coffee to which no other ingredients have been added. • foods in small units⁵; 	Further examples could be added, e.g. food supplements, foods not intended for retail sale, foods with packaging limitations, etc.
	FoodDrinkEurope prefers the inclusion as suggested in 2.1 for consistency.
3. DEFINITION OF FRONT-OF-PACK NUTRITION LABELLING (FOPNL)	
For the purposes of these guidelines:	
3.1. <i>Front-of-pack nutrition labelling (FOPNL)</i> is any system that presents simplified nutrition information on	FoodDrinkEurope does not support the inclusion of "health warning" type labels (ex. High in salt") in the definition/scope of FOPNL.

¹ As defined in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).

² As defined in the *Guidelines on Nutrition Labelling* (CXG 2-1985).

³ Exclusions are foods that must not have FOPNL. Exemptions are where the food does not have to have FOPNL, but if it does, it does not affect its application.

⁴ This list is indicative.

⁵ Section 6 of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) refers to 'small units' as where the surface area is less than 10cm²

the front-of-pack ⁶ of pre-packaged foods. ⁷ It can include symbols/graphics, text or a combination thereof, that provide factual information on the contribution of a food to the energy and nutrient content of a diet and/or on the nutritional value of the food.	
3.2. This definition excludes symbols/isolated graphics or isolated textual indications applicable to a limited number of products or nutrients based on the presence, absence, reduction or fortification of a nutrient, food or food category, such as:	
i. Nutrition claims;	Add reference to Codex Guidelines on Claims
ii. Health claims;	
iii. Allergenic labelling; and	
iv. The quantitative declaration of ingredients.	
4. GENERAL PRINCIPLES	
An FOPNL should be based on the following general principles in addition to the general principles in the <i>General Standard for the Labelling of Prepackaged Foods</i> (CXS 1-1985):	
4.1. Only one FOPNL system should be recommended in each country or region. However, in case of coexisting a FOPNL system with other systems, these should not be contradictory to each other.	Agree
4.2. FOPNL should present information in a way that is easy to understand by a wide variety of consumers in the country of implementation and which is not misleading the consumer. The format of the FOPNL should be informed by scientifically valid consumer research.	The concept of “not misleading the consumer” is a critical concept to be added in the General Principles section, either in the way suggested or as stand-alone.
4.3. FOPNL should only be provided in addition to, and not in place of, the nutrient declaration.	Agree
4.4. FOPNL should be accompanied by a consumer awareness and education/information program to increase consumer understanding and use.	Agree

⁶ *Front-of-pack* means the total area of the surface (or surfaces) that is displayed or visible under customary conditions of sale or use.

⁷ As defined in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).

4.5.	<p>This principle is considered problematic as it is impossible to ensure its compliance given that food manufacturers do not control how a product is displayed in store (e.g. the same product could be stacked flat in some stores & stacked on its side in other stores). Therefore, this principle is difficult to implement and enforce consistently.</p> <p>The possibility to use other ways (e.g. digital media, website, shelf-tags...) should be highlighted as indicated in our previous comments.</p> <p>If this is nevertheless decided to be kept, we propose <u>not</u> to retain the addition between brackets [“without the need to pick up the food package”], since the current expression “clearly visible” is already sufficient and easy to understand. Unnecessary repetitions, especially in multilateral fora language, should be avoided.</p>
4.6. FOPNL should align with evidence-based international and/or national dietary guidance .	We propose to retain the reference to “ <i>evidence-based dietary guidance</i> ”, as this is much more coherent with the following point 4.6 concerning “ <i>sound scientific valid evidence</i> ”, with respect to the much less scientific concept of “ <i>health and nutrition policies</i> ”.
4.7. FOPNL should be underpinned by objective measures as supported by sound scientific valid evidence. It aims to facilitate consumer understanding of the contribution or importance of the food to the energy and nutrient content of a diet.	<p>We suggest to delete the reference to “nutrients of global importance” given that it is not clear what is meant by this (no definition at Codex level).</p> <p>Additional language suggested to clarify the purpose.</p>
4.8. FOPNL should allow consumers to increase their understanding of the nutritional value of foods and assist them in interpreting the content of the nutrient declaration..	This is coherent with the Codex Guidelines on Nutrition Labelling (CXG 2-1985)
4.9. Should be objective and non-discriminatory, and should not exploit fear in the consumers	This is in line with CODEX General Guidelines on Claims (CXG 1 1979, para 3.5)
4.10. FOPNL should be developed in collaboration with all interested parties including government , private sector, consumers, academia, public health associations among others.	<p>As the FOPNL guidelines are also suggested to be addressed to other stakeholders, we believe that FOPNL schemes can also be industry/stakeholder-lead.</p> <p>Collaboration with stakeholders, in particular the industry, is crucial to ensure feasibility and uptake of the FOPNL scheme.</p>
4.11. Should be monitored and evaluated to determine effectiveness/impact.	Agree
4.12. Should be implemented in a way that encourages use on food labels.	Could be misread as understanding that FOPNL is mandatory, whereas we strongly believe it should be voluntary.

<p>4.13. Should be calculated and applied to the food in a manner consistent with the corresponding nutrient declaration for that food such that it represents the nature of the food as consumed or as sold, as appropriate.</p>	<p>The current wording is too vague.</p> <p>The calculation should be done as consumed when relevant for products that need to be reconstituted for the consumption to give a useful information for consumers in an aligned way with their diet. In these cases, sufficiently detailed preparation instructions must be given by the food business operator.</p>
<p>5. OTHER ASPECTS TO CONSIDER IN THE DEVELOPMENT OF FOPNL SYSTEMS</p>	<p>The overall objective should be to encourage global harmonisation aligned with WTO recommendations and as such the principles should be broad enough to encourage a high level of global consistency and to minimise trade barriers.</p> <p>It is reasonable to allow authorities a certain amount of flexibility in the development of systems that best support the needs of the average consumer in the country(ies) of use, but this should not create barriers to trade. Also, a FOPNL cannot take the place of consumer education programmes which should address specific consumer needs/deficiencies on a national/regional basis.</p> <p>As a minimum, it is suggested to include reference, e.g. in the General Principles, to the importance of mutual recognition/reciprocity in helping to facilitate trade while respecting national differences. If the Committee agrees with this addition, we suggest informing CCFICS of the proposal as well, as this will be particularly relevant for import/export purposes.</p>
<p>While the purpose, scope and principles for FOPNL aim to provide a high level of global consistency in approach to FOPNL, there remains a need for flexibility in order to tailor a FOPNL system to the needs of the specific population/s in the country or region of implementation.</p>	
<p>Therefore, there are a number of other aspects to consider in the development and implementation of a FOPNL system. Many of these may be decided at national or regional level to meet specific requirements of consumers in individual countries or regions. Many of the considerations for national and/or regional competent authorities relate to the implementation of the scope and global principles at the national/regional level.</p>	<p>Consistent with other Codex texts.</p>
<p>Some considerations for national and/or regional competent authorities could include the following:</p>	
<p>5.1. Selection/Development of the FOPNL System</p>	<p>We are concerned that this section may result in more trade barriers and wonder what can be done to avoid a plethora of labelling systems worldwide which may confuse consumers and create burdens for global food business operators.</p>

<ul style="list-style-type: none"> The system must meet the global principles for a FOPNL as defined in Section 4 (General Principles), but the exact form of the system should be informed by local/regional research. 	<p>Cross-reference added.</p>
<ul style="list-style-type: none"> To consider whether the FOPNL should provide a summary indication of the nutritional quality of the whole food or information on separate nutrients. 	
<p>5.2. Implementation of the FOPNL System</p>	
<ul style="list-style-type: none"> Consideration whether there are additional foods that are not be intended to have FOPNL such as: 	
<ul style="list-style-type: none"> o Foods with minimal nutritional value 	
<ul style="list-style-type: none"> o Foods where a nutrient declaration is not needed 	
<ul style="list-style-type: none"> o Foods in small packages or with other packaging limitations 	
<ul style="list-style-type: none"> Consideration may also be given at national/regional level to potential application of a FOPNL system more broadly than pre-packaged foods. Competent authorities may also wish to consider whether FOPNL be extended to include: 	
<ul style="list-style-type: none"> o Unpackaged foods 	
<ul style="list-style-type: none"> o Food sold via online sales (e.g. information available at point of purchase on websites) 	<p>This should generally be in scope of this guidance (as per above comments in definitions section)</p>
<ul style="list-style-type: none"> o Point of purchase information not on the label (e.g. shelf signposting) 	
<ul style="list-style-type: none"> o Food sold or otherwise provided in food service institutions such as schools or hospitals 	
<ul style="list-style-type: none"> Consideration of the need for supporting guidance documents such as style guides, calculators etc. 	
<ul style="list-style-type: none"> Consideration will need to be given as to how to maximise uptake including whether the FOPNL should be voluntary or mandatory, including consideration of trade impacts particularly for mandatory implementation. 	
<ul style="list-style-type: none"> Key stakeholders to be involved in the developing guidance documents (important to have end users involved in the development of the guidance). 	
<ul style="list-style-type: none"> 	<p>These two questions should either be answered or be removed from the text.</p>
<p>5.3. Presentation of the Information</p>	
<ul style="list-style-type: none"> Consumer research in the target population should underpin decisions regarding the best for of presentation of information in the FOPNL. 	

<ul style="list-style-type: none"> • Consumer understanding and use of the FOPNL used should be monitored at baseline and after implementation. 	
<ul style="list-style-type: none"> • Consider if there are occasions when the top or other surface may be the appropriate place for the FOPNL. For example, when it is displayed in a horizontal freezer or in a container in which the consumer looks down. 	
<p>5.4. Education Programmes</p>	
<ul style="list-style-type: none"> • Consumer research on the target/intended population should inform development of a consumer education programme 	
<ul style="list-style-type: none"> ○ What is the best media to use? 	
<ul style="list-style-type: none"> ○ What will make the message most likely to be seen and taken on board? 	
<ul style="list-style-type: none"> ○ What do consumers need to know to use the FOPNL successfully? 	
<p>5.5. Monitoring and Evaluation of the FOPL system</p>	
<ul style="list-style-type: none"> • Type of monitoring and evaluation possible to be undertaken. 	
<ul style="list-style-type: none"> • What baseline data is needed to measure impact of the FOPNL? 	
<ul style="list-style-type: none"> • Consideration should be given to monitoring: 	
<ul style="list-style-type: none"> ○ Uptake of the label by industry 	
<ul style="list-style-type: none"> ○ Consumer use of and understanding of the FOPNL 	
<ul style="list-style-type: none"> ○ Composition of the food supply 	
<ul style="list-style-type: none"> ○ Impact on nutrient intake of consumers 	
<ul style="list-style-type: none"> • How to balance continuous improvement without constant change. 	

FIVS

- FIVS supports the outcome of the work of the electronic working group Chaired by Costa Rica and Co-chaired by New Zealand and, more precisely, the proposition, included in the document CX/FL 19/45/6, to exempt alcoholic beverages from Front of Pack Nutritional Labelling (FOPNL).
- As explained in CX/FL 19/45/6, it would be inappropriate to apply FOPNL to alcoholic beverages as it could be misunderstood by consumers as a promotion of certain alcoholic beverages over others based on risk nutrients identified for other foods.
- In addition to the risk of misleading consumers, it is necessary to consider the negative economic impact FOPNL would have on the wine sector because of the consequent necessity to translate the front label. Normally, in the wine sector, only back labels are adapted and translated for each market, while the front label remains unchanged independently of the destination market.
- FIVS requests Codex Members States to support the exclusion of alcohol beverages from FOPNL as proposed by the electronic working group.

INTERNATIONAL ORGANISATION OF VINE AND WINE (OIV)

The International Organisation of Vine and Wine (OIV) welcomes and appreciates the work on Guidelines on Front-of-Pack Nutrition Labelling (FOPNL) prepared by the Electronic Working Group Chaired by Costa Rica and Co-chaired by New Zealand.

The OIV understands that promotion of one type of alcohol over another based on risk nutrients identified for other foods is misleading and could result in unintentional promotion of some alcoholic beverages.

As member of the eWG, The OIV take note that EWG members agreed that it could be inappropriate to apply a FOPNL to certain foods. This included alcoholic beverages, given the role of FOPNL in guiding consumers to healthier food choices and that this specific exclusion had broad support from the members of the EWG.