

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CL 2020/57-FL
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TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for comments / information on innovation – use of technology in food labelling

DEADLINE: 15 January 2021

COMMENTS:

To:

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BACKGROUND

1. The 45th Session of the Committee on Food Labelling (CCFL45) considered a paper on innovation and technology in food labelling noting that CCFL44 had identified this area of food labelling as possible new work. Noting the general interest in the topic, CCFL45 agreed that Canada would prepare a discussion paper to further clarify the scope of innovation and technology in food labelling, taking into account the discussions and to consider preparing a project document for consideration by CCFL46.¹
2. Canada has prepared a discussion paper based on information provided to CL2019/82-FL (see Appendix I).
3. In view of the postponement of CCFL46 to 2021 due to the COVID19 pandemic, and taking advantage of the additional time at our disposal, Codex members and observers are kindly invited to consider the summary and conclusions in section 4.1 and questions in section 4.2 of the discussion paper regarding innovation – use of technology in food labelling in Appendix I.
4. Comments in reply to this Circular Letter will assist Canada to further develop the discussion paper and a project document, as necessary.

REQUEST FOR COMMENTS

5. Codex members and observers are invited to provide information and replies to the questions in section 4.2 in Appendix I.

¹ REP19/FL paras 102 - 105

APPENDIX I

**INNOVATION – USE OF TECHNOLOGY IN FOOD LABELLING
DRAFT DISCUSSION PAPER****1. Introduction and Background**

At the 44th Session of the Codex Committee on Food Labelling (CCFL), the Committee considered potential work based on the *Discussion Paper on Future Work and Direction for CCFL*, (CX/FL 17/44/9) that covered previously identified, current, and potential work for the Committee. Broad support was received for the item “Innovation – use of technology in labelling”.

The Committee agreed that a discussion paper would be developed and prepared by Canada. It was further agreed that information would be sought through a Circular Letter (CL) on current practices, issues and any potential roles for CCFL. A total of 17 responses were received (14 member countries and 3 observer organizations).

At the 45th Session of CCFL, Canada introduced the discussion paper CX/FL 19/45/9. Three key areas identified for discussion and possible new work were introduced: a) the development of criteria for labelling to be made available at the point of sale; b) the revision of the definition for “label” and “labelling” in the *General Standard for the Labelling of Prepackaged Foods* (GSLPF); and c) the review of other Codex texts developed by CCFL.

The Committee expressed general interest on the topic of innovation and technology in food labelling, while noting several considerations, including the need to clarify the distinction between this work and that on internet sales/e-commerce. As a result, the Committee agreed that Canada would prepare a revised discussion paper to further clarify the scope of potential work on innovation and technology in food labelling, taking into account the discussions at CCFL45 and to consider preparing a project document for consideration by CCFL46. It was again agreed that information would be sought through a CL, to provide information to help in the development of the discussion paper².

In August 2019, member countries and observers were invited through CL 2019/82-FL to provide information on innovation and technology in food labelling and to consider seven questions to inform their submissions³.

The questions sought to identify what gaps remain for CCFL to address with respect to the use of technology in the sale of foods or in conveying information about foods to consumers or other buyers, taking into consideration the concurrent work on internet sales. Questions were also raised regarding the current GSLPF definitions of “label” and “labelling” with respect to information provided by technology that is not accompanying the food. The type of food labelling information that could be provided using technology and how to ensure its accessibility were also discussed.

A total of 24 responses to CL 2019/82-FL were received (18 member countries, 1 member organization and 5 observer organizations; refer to [ANNEX 1](#) for a detailed list of respondents). These form the basis of this discussion paper.

In view of the postponement of CCFL46 due to the COVID19 pandemic, and taking advantage of the additional time between sessions, this paper has been prepared with key questions for input by all interested members and stakeholders. Responses to the questions will help guide completion of the discussion paper and project document, if appropriate, for consideration at the next session of CCFL.

2. Scope

The topic of innovation and the use of technology in food labelling has been previously described as exploring if and when labelling information can be provided through the use of technology, even when the

² REP19/FL, para 105

³ CL 2019/82-FL - [Request for Information on Innovation and Technology in Food Labelling](#)

physical product is present. This may include, for example, a QR code on a product that links to additional information on a website or web-based application.

There is a distinction between the subject of innovation and technology in food labelling and the work on e-commerce / internet sales of food. However, they are closely linked. For the purposes of this paper, innovation and technology in food labelling relates to labelling information provided via technology with respect to a prepackaged food that *is* physically present with the consumer, including when the purchasing decision is made. This is compared to the internet sales work which relates to the labelling of prepackaged foods offered for sale via e-commerce, or in other words, prepackaged foods that *are not* physically present with the consumer when the purchasing decision is made.

Compliance and enforcement with respect to the use of innovation and technology has not been considered for the purposes of this discussion paper.

3. Analysis of Responses

Overall, based on the number of responses received, there is a general interest and acknowledgement of the increasing prevalence of innovation and technology in food labelling. However, there was some variation regarding the amount or depth of new work that should be pursued on the topic.

3.1 Gaps in Current Work or Texts

Question (a): Considering the CCFL work on internet sales (REP19/FL Appendix III page 41-43), what gaps remain for CCFL to address respecting the use of technology in the sale of foods or in conveying information about foods to the consumer or other buyers?

The work on Internet Sales⁴ aims to develop a supplementary text to the GSLPF¹ that will specify the information that shall appear in the virtual depiction of prepackaged food sold through e-commerce. The work will also review and revise, as necessary, the current provisions under the GSLPF and other Codex texts related to food labelling, to ensure their scope includes food sold in an e-commerce environment.

Considering this, respondents' most commonly identified gaps remaining for CCFL to address surrounding innovation and technology were to define:

- the type of food labelling information that may or may not be provided through technology (i.e. mandatory vs voluntary information) (52%),
- situations in which certain information may or may not be presented through technology (e.g. very small packages, bulk display) for consumer prepackaged food (35%), and
- the terms 'innovation' and 'technology' (39%), which it was noted may help to clarify scope of the new work and identify situations other than e-commerce where such technology may be used.

Other gaps identified by respondents were considerations for technology-based labelling solutions for products sold in-store and on-product labelling innovation which may be food safety related (time-temperature indicators, integrity indicators, freshness indicators) (30%). Others noted it is important to consider accessibility and consumers who do not have access to innovative technology (22%). Another identified gap that new CCFL work on innovation and technology could address is the potential role of technology in facilitating the increased consumer demand for food information (i.e. of production, religious certification, environmental or ethical attributes, organic status, provenance) (22%). Lastly, gaps in how innovation and technology may be used in advertisements or production promotional requirements could be addressed by new work (13%). One respondent indicated points addressed in REP19/FL Appendix III in reference to internet sales are complete. The topic of loose foods was brought up by one respondent.

⁴ [REP19/FL Appendix III](#)

3.2 Definitions of Label and Labelling

Question (b): Do the current CCFL definitions for “label” and “labelling” sufficiently capture information that is not accompanying the food, such as mandatory or voluntary labelling information provided virtually using technology? If not, what is the best approach to address this gap, e.g. a new definition or revisions to the existing definitions?

The majority of respondents (86%) indicated that the current GSLPF definitions for ‘label’⁵ and ‘labelling’⁶ do not capture labelling information that is provided virtually using technology. It was noted that the definition of ‘label’ is effective when the package of food is physically present at the point of sale. While the definition of ‘labelling’ applies more broadly and includes information accompanying or displayed near the food, it does not sufficiently encompass virtual information, such as that accessible using a QR code.

Some respondents (14%) noted that the current definitions do not require any changes and sufficiently capture information that is not accompanying the food and is provided by other technological means.

55% of respondents proposed that work on innovation and technology should include revisions to the existing definitions for ‘label’ and ‘labelling’, while 18% suggested new definitions be drafted for use in the context of innovation in technology alone. Many noted that care must be taken to avoid any potential unintended consequences of updating the existing definitions of “label” and “Labelling”, as these terms are widely used throughout Codex texts and apply horizontally. An example of an unintended consequence could arise if the definition of “label” were to no longer relate exclusively to a container of food/physical product, potentially allowing inadvertently labels to be provided using electronic means. It was also suggested that any potential innovation and technology work to amend these definitions align with the work on e-commerce and internet sales.

It was suggested by three member countries and one member organization that introducing the new concept of ‘food information to consumers’ could address the gap in current definitions of ‘label’ and ‘labelling’, as it could cover not only food labelling, but all food information provided to consumers. The example provided was the approach used in EU Regulation No 1169/2011, under which “food information to consumers” allows some food information to be provided via technology under certain conditions. This regulation defines food information as “*information concerning a food and made available to the final consumer by means of a label, other accompanying material, or any other means including modern technology tools or verbal communication*”. Furthermore, it was noted that it could be confusing to update the term ‘labelling’ to include other technology, as the term ‘labelling’ refers to the physical label, rather than virtual food or information accompanying the food.

3.3 Current Requirements for Mandatory Labelling Information Provided Through Technology

Feedback indicated that 79% of respondents have not identified mandatory labelling information that may

Question (c): Within your country / region, have you identified mandatory labelling information that can be provided through technology? Have you identified criteria for the use of technology in food labelling? If so, please elaborate.

be provided through technology. Three Member Governments (13% of respondents) have identified

⁵ “Label” means any tag, brand, mark, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed or impressed on, or attached to, a container of food (*General Standard for the Labelling of Prepackaged Foods* CXS 1-1985)

⁶ “Labelling” includes any written, printed or graphic matter that is present on the label, accompanies the food, or is displayed near the food, including that for the purpose of promoting its sale or disposal.

mandatory labelling information that may be provided through technology; 2 of which (8%) have criteria for the use of technology in food labelling.

Two Member Governments (8% of respondents) reported regulating the requirements for internet sales, but not which mandatory information should be provided through technological means. It was noted that one Member Government has implemented a mandatory requirement for all food products to bear a 2D barcode (e.g. QR code) that includes information on the name and address of the manufacturer, brands, registration number, expiry date of registration number, and type of packaging. One Member Government also noted that it is not permitted to convey food information to consumers through the use of technology (it is only permitted in business to business transactions through the labelling of non-retail containers).

Two respondents (8%) described Article 12(3) of the EU Regulation No 1169/2011 that allows the provision of mandatory food information to be expressed by means other than on the consumer package or label if the same level of information that is required to be on the package or label is ensured, and there is evidence of uniform consumer understanding and wide consumer use of these technologies. However, it was also noted that the EU has not identified criteria for the expression of certain mandatory food information by means other than on the label yet.

One member country indicated that in their context the use of technology in labelling is optional in some scenarios including:

- for food sold via vending machines,
- restaurant menu nutrition information,
- identification marks such as a barcode applied to each shipping container in business to business transactions, and
- bioengineering information that may be provided via electronic or digital link (must be accompanied by additional information) or text message (in addition to on-label options).

In another comment, it was suggested that at an individual country level, technological means may be appropriate to provide information that would normally be mandatory for a prepackaged food but is exempt from being on a label in certain circumstances. One observer organization noted that a survey was conducted regarding consumer views on receiving mandatory labelling information by means other than the label for chewing gum. This survey found a preference for nutrition information via other means, including technology (particularly sugar-free gum).

3.4 Providing Mandatory Information using Technology

Question (d): What mandatory food labelling information is appropriate to be provided using technology, and under what circumstances?

Half of the respondents indicated that food information provided through technology should supplement rather than replace mandatory information on the label of consumer prepackaged food, citing concerns regarding accessibility. In other words, it would not be acceptable at this time to provide mandatory food labelling information *through technological means only* particularly for health and safety related information (e.g. ingredients, allergens, best before dates). Feedback from 39% of respondents suggests its appropriate to allow labelling information that is eligible for exemption (e.g. the small package exemption) or voluntary (e.g. claims, nutrition labelling, translation into different languages) to be provided through technology.

11% of respondents to the CL noted that mandatory information is appropriate to be provided using technology in the case of business-to-business exchange. Others noted that any information provided through technological means must comply with 'Section 7: Optional Labelling' of the GSLPF.

3.4.1 Criteria for the Use Technology in Labelling

Question (d)(i): Should CCFL outline specific types of labelling and circumstances when the use of technology may be appropriate, or outline broad criteria for its use?

Feedback was received from 18 member countries and 4 observer organizations; 59% of responses indicated CCFL should outline broad criteria for the appropriateness of the use of technology in food labelling. Of these, several stated that the development of broad criteria would allow the text to accommodate changes to technology over time and be more flexible to innovation. On the other hand, 23% of respondents supported outlining specific circumstances under which the use of technology may be appropriate in food labelling. Nearly 14% supported a combination of both broad criteria and specific circumstances whereby technological means to labelling would be appropriate. One respondent stated there is no need for Codex to be involved in presentation of voluntary information by new technology, as Codex may unnecessarily and unintentionally restrict the communication to consumers in a space that is seeing rapid changes in technology.

3.4.2 Location of Information

Question (d)(ii): Where should such provisions be placed, e.g. in the General Standard for the Labelling of Prepackaged Foods, the Guidance on the Labelling of Non-Retail Containers, or elsewhere?

Feedback was received from 19 member countries and 4 observers; 57% of responses indicated that provisions on the use of technology and innovation in food labelling should be placed in the GSLPF. Further to this, one respondent noted that the discussion paper on future work states that the work should cover new technology to convey information directly *to the consumer*, so it follows that new provisions should be placed in the GSLPF. However, 26% of respondents support revising both the GSLPF (for consumer prepackaged food) and the Guidance on the Labelling of NRC guidance (for business to business transactions), half of which suggested GSLPF updates should come first, and then update the Guidance on the Labelling of NRC.

One member country indicated that any such provisions should be placed in a new, separate Codex text, while another member noted the importance of ensuring any new work on innovation and technology aligns with the ongoing e-commerce updates to the GSLPF. Two Member Governments (8%) noted that it is premature to decide where such provisions should be placed, pending clarification of the scope of the new work. One member country stated that a new document is not needed.

3.5 General Principles for Food Labelling

Question (e): How should CCFL ensure that food labelling information conveyed using technology complies with general principles, including that it is not presented in a manner that is false or misleading?

There was general consensus from respondents that all prepackaged food information should comply with Section 3 of the GSLPF, whether the information is provided through technological means, or not. This provision requires that food information be presented in a manner that is truthful and not misleading.

Feedback included several proposals for how to integrate, supplement or revise the GSLPF to include labelling through technological means:

- Updating Section 8 to clarify that innovative technology is included in scope,
- As previously noted, updating the definitions of 'Label' and 'Labelling' to clarify that technological means of providing food information to consumers is included,
- Aligning any updates with ongoing work in e-commerce/internet sale of food, and
- Similarly to what was noted above in response to Question 2, introducing a new definition or concept for 'food information for consumers' whether it accompanies the food or not, and then modifying 'Section 3 – General Principles' of the GSLPF so that it applies to information covered by this new term.

Several respondents also noted that it is the responsibility of food business operators to demonstrate compliance with applicable national legislation. Compliance and enforcement activities are not under the jurisdiction of Codex; rather, the competent authority in each nation is responsible for enforcing legislation under its jurisdiction.

3.6 Accessibility, Format and Presentation of Information Provided Using Technology

Question (f): What should CCFL consider with respect to accessibility, format, and presentation of information provided using technology?

Responses to this question were wide and varied. However, most respondents indicated that legibility and presentation of information through technology is important. Some suggested this should be in line with the principles in Sections 3 and 8 of the GSLPF (which could be adapted as necessary). Several respondents identified accessibility as a clear priority in any new work on innovation and technology in food labelling. The comments surrounding the umbrella of accessibility included a range of topics such as technological literacy, consumer readiness and the availability of technology to populations globally. The question of equal access to information remains a key consideration and should take into account the readiness of countries in assessing information or using technology in food labelling. Further considerations surrounding technology, food labelling and accessibility included the following:

- Three Member Governments (14% of respondents) raised questions as to who has the responsibility to provide the electronic device to the consumer to ensure accessibility, if necessary. Would it be the manufacturer, retailer, distributor or other?
- Four respondents noted that further consideration should be made for consumers with a visual or hearing impairment.
- It was also noted that the way to access further information should be clearly marked on the physical label.
- Several respondents noted the new work could address access to labelling information provided through technology or innovation in the event of technological breakdown or failure. It could discuss how to maintain a “traditional” source of information, such as through consumer hotlines and other alternatives (i.e. in-store catalogues), that can be accessed in case other technology fails (even if temporarily). The protection of user privacy and online security measures were also noted as important considerations.
- Others noted the importance of identifying what information should always be accessible to the consumer at the point of sale.
- One Member Government asked for clarity surrounding what is meant by the term ‘accessibility’

Three Member Governments (14% of respondents) noted that the work on innovation and technology could consider adapting language from the Guidance on the Labelling of Non-Retail Containers on the points of accessibility, format and presentation, and expand on them if necessary. Multiple respondents stated that format and presentation of labelling information provided through technology should meet same requirements for traditional labelling on prepackaged food. Suggestions to update Sections 3 (General Principles) and 8 (Presentation of Mandatory Information) of the GSLPF to clarify that these requirements include information provided using technology were also received. This would ensure consistency between information provided on physical label and information provided through technological means.

Others stated that consideration should be given to technological platform(s) that may be used, potential differences in format, and how information may be presented between platforms or programs. Identifying principles to facilitate a level of consistency across different technological labelling platforms could be beneficial in ensuring standardized presentation of information, but these need to be flexible enough to allow for innovation and technology to keep evolving at a fast pace.

One member country noted that information that appears in one location on the technology platform should be free from other information that may detract from its prominence or confuse consumers about how it applies to the food being purchased (e.g. advertisements for other items for sale). Information should be

readily and directly available from the reference link and should be dated and linked to the lot of product being sold (in the case of information that may change over time or become outdated).

Another member country noted that consideration should also be given to enforcement and compliance approaches available to competent authorities that would enable non-compliance of labelling information conveyed through the use of technology to be effectively addressed.

Another suggestion stated that the technological food labelling information should be available for a time period that is as long as the best before date of the food. The accuracy of the information should also be ensured over this time.

3.7 Other Codex Texts to be Reviewed for Possible Amendments

Question (g): Which other Codex texts should be reviewed for possible amendments that would facilitate the use of technology in food labelling?

As previously reported, there was general consensus for reviewing the GSLPF. The following Codex texts were also recommended for review:

- Guidelines on Claims (CXG 1 – 1979) (41%)
- Guidelines on Nutrition Labelling (CXG 2 – 1985) (36%)
- Guidelines for the Use of Nutrition and Health Claims (CXG 23 – 1997) (36%)
- General Standard for the Labelling and Claims for Prepackaged Foods for Special Dietary Uses (CXS 146-1985) (23%)
- Guidelines for Food Import Control Systems (CXG 47-2003) and other CCFICS work on traceability (23%)
- General Standard for the Labelling of Food Additives When Sold As Such (CXS 107-1981) (23%)
- Work on e-commerce / internet sales (14%)
- Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children (CXG 10-1979)
- Compilation of Codex texts relevant to the labelling of foods derived from modern biotechnology (CXG 76:2011)
- General Guidelines for Use of the Term “Halal” (CXG 24:1997)
- General Principles for the Addition of Essential Nutrients to Foods (CAC/GL 9-1987)
- Guidelines for Food Import Control Systems (CXG 47-2003)
- Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (CXG 32-1999)
- Guidelines for Vitamin and Mineral Food Supplements (CXG 55:2005)
- Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991)
- Draft Guidance for the Labelling of Non-retail Containers
- Standard for Canned Baby Foods ([CXS 73-1981](#))
- Standard for Follow-up Formula ([CXS 156-1987](#))
- Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten ([CXS 118-1979](#))
- Standard for Formula Foods for Use in Very Low Energy Diets for Weight Reduction ([CXS 203-1995](#))
- Standard for Formula Foods for Use in Weight Control Diets ([CSX 181-1991](#))

- Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants ([CXS 72-1981](#))
- Standard for Labelling of and Claims for Foods for Special Medical Purposes (CXS 180-1991)
- Standard for Processed Cereal-Based Foods for Infants and Young Children ([CXS 74-1981](#))
- Standard for Special Dietary Foods with Low-Sodium Content (including Salt Substitutes) ([CXS 53-1981](#))
- Statement on Infant Feeding (CAC/MISC 2-1976)

4 Conclusions and Next Steps

This discussion paper has provided a summary of the responses received to the CL 2019/82-FL questions posed to CCFL Members and Observer Organizations regarding potential new work on the use of innovation and technology in food labelling. The range of responses received continues to suggest overall recognition from member countries and observers that the use of innovation and technology in food labelling is a relevant topic that requires consideration.

4.1 Summary and Conclusions

There were several common elements in the responses received:

- a) Mandatory information should remain on the physical label of prepackaged foods for consumers at this time, with a key concern being uniform accessibility, particularly for health and safety information. There are very few circumstances where respondents considered that technology should be permitted to replace the physical label at this time. The few examples provided where this may be appropriate included very small packages, certain country-specific labelling information, and business-to-business transactions.
- b) The general principles in Section 3 of the GSLPF, indicating that information must not be false, misleading or deceptive, should apply to all information about a prepackaged food, whether provided on the label, in labelling, or through other means such as technology.
- c) Supplementary or voluntary information are appropriate to provide using technology. This would include, for example, the repetition of mandatory information already on the label on a technological platform, the provision of labelling information in additional languages, or voluntary information about a food that was not placed on the label (e.g. method of production of or origin of ingredients, certification body standards, etc.).
- d) The current GSLPF definitions of 'label' and 'labelling' do not include information provided through innovation and technology. However, as many respondents indicated that mandatory information should remain on the physical label, to achieve this it would be important to maintain a "label" definition that relates to it being physically applied to a container of food. It is possible that this view may change over time as technology evolves and if it becomes possible to ensure more universal access to the labelling information through other means.
- e) The current Draft Guidance for the Labelling of Non-Retail Containers of Food already address the use of innovation and technology for those types of foods, in that these guidelines provide specific circumstances under which alternative means (which includes technology) may be used to provide certain types of mandatory labelling information. The Draft Guidance also addresses the presentation of information provided by means other than the label. This text may be a useful reference as the work on the use of technology in food labelling continues.
- f) While several respondents supported outlining broad criteria for the use of technology in labelling, there was also general agreement that mandatory information in the GSLPF should remain on the physical label at this time. This raises the question as to what such criteria would need to cover.
- g) Any future work will need to consider legibility and presentation of information. It will also need to consider equitable consumer access to, and familiarity with, technology, particularly for developing countries. Potential technology outages, power failures, or other interruptions would also be factors.

- h) The scope of any new work on innovation and technology should align with and not overlap, the work on e-commerce / internet sale of food.
- i) Various other Codex texts may need to be reviewed for possible amendments as a result of the innovation and technology work.
- j) Any new work should be broad and flexible in order to allow for future technological innovations.

4.2 Questions for Members and Observer Organizations, and Next Steps

Through the analysis of the responses received, Canada seeks feedback on the following additional questions to enable the completion of the discussion paper in preparation for the next session of CCFL, and the preparation of a project document, as necessary.

1. Do you agree with conclusion 4.1 (a)? If so, there would be no clear need for new work to identify specific labelling information that may be provided using technology at this time (with the possible exception of #4 below). Do you agree that support for conclusion 4.1 (a) would include ensuring that there remains a definition of “label” that is exclusively about a physical product, i.e. a label applied to a container of food? Please provide a rationale.
2. Do you agree with conclusion 4.1 (b)? Why or why not? If you agree, how should this be achieved? Do you support defining a new term (e.g. “food information for consumers”) and amending section 3 of the GSLPF to include this term? Do you believe CCFL should consider whether the definition of “labelling” could be adjusted for this purpose? Do you have other suggestions?
3. Do you agree with conclusion 4.1 (e)? Do you see any additional need for CCFL to address the use of technology in the labelling of non-retail containers of food beyond what is in the existing Draft Guidance for the Labelling of Non-Retail Containers of Food?
4. With respect to prepackaged food for consumers, the key areas where respondents saw the potential value in the use of technology to provide labelling information were with respect to:
 - (i) supplementary or voluntary labelling information (subject to the General Principles in Section 3 of the GSLPF as outlined above);
 - (ii) specific circumstances that may involve exemptions, such as very small packages where a physical label cannot fit all of the mandatory information;
 - (iii) country specific requirements.

Further, respondents also supported specifying legibility and accessibility requirements related to information provided through technology. To address this feedback, Canada is seeking input on two possible options:

- a. No new work is required at this time. Items 1 and 3 above address the provision of mandatory information through the use of technology. As the main remaining area of support for the use of technology in labelling relates to information that is voluntary and not required under CCFL texts, there is no need to develop additional guidance, other than that proposed in question 2.
- b. Given that several respondents supported outlining broad criteria for the use of technology in labelling, CCFL could consider developing guidance with respect to the themes that are summarized in items 1-4 above. Such guidance could outline, for example, principles surrounding types of information that must always be physically present with a prepackaged food at time of sale, exceptional circumstances where exemptions may be appropriate, considerations with respect to the provision of voluntary information through technology, and related legibility and accessibility considerations.

Which of the above two options, (a) or (b), do you support? Do you have another suggestion? Please provide a rationale.

5. Do you support reviewing and amending as necessary any existing texts affected in pursuit of the above?

6. Do you have any other comments on the conclusions in section 4.1, or any other considerations to offer?

In all cases, the concurrent CCFL work on e-commerce/internet sales will be taken into consideration as innovation and technology in food labelling is considered.

ANNEX 1: List of Respondents to CL2019/82-FL**Member Countries**

Australia

Canada

Colombia

Costa Rica

Ecuador

Honduras

Indonesia

Iran

Japan

Mexico

New Zealand

Peru

Philippines

Switzerland

Thailand

United Kingdom

United States of America

Uruguay

Member Organization

European Union

Observer Organizations

International Council of Beverage Associations

European Alcohol Policy Alliance

Food Industry Asia

FIVS

International Chewing Gum Association