

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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CL 2022/09-FL

March 2022

**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 information on labelling exemptions in emergencies**

**DEADLINE:** 8 May 2022

## BACKGROUND

1. At its 46<sup>th</sup> session, the Codex Committee on Food Labeling (CCFL) discussed the possibility of future work to assist countries in establishing flexibilities in food labelling requirements when necessary to assure supply chain resilience during national or global public health emergencies, such as the current COVID-19 pandemic.
2. CCFL46 agreed that the United States of America would prepare a discussion paper to outline possible new work for consideration by CCFL and that a Circular Letter (CL) would be issued to request information to support the development of this discussion paper.<sup>1</sup>
3. It is understood that some countries or regions have considered and implemented a variety of temporary labelling flexibilities to address supply chain challenges caused by the COVID-19 pandemic. This variance supports the need for a common and structured framework for such labelling flexibilities to ensure both consumer protection and fair trade.
4. To assist in developing the discussion paper on possible labelling exemptions in emergencies, a set of questions have been developed (see Appendix).
5. The questions are intended to obtain input from the Codex membership and to share their experience, if any, with labelling flexibilities, and to guide and inform the types of labelling flexibilities to be considered as part of the future work. In addition, the feedback will help assess whether those labelling flexibilities are best provided for by amendments to the *General Standard for the Labelling of Prepackaged Foods* (GSLPF) ([CXS 1-1985](#)) or through a separate guideline document.

## 6. REQUEST FOR COMMENTS

7. Codex members and observers are invited to respond to the questions in the Appendix.
8. The aforementioned questions are uploaded to the Codex Online Commenting System (OCS): <https://ocs.codexalimentarius.org/>, as per the guidance below.

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<sup>1</sup> REP21/FL, paras 163 - 166

**10. GUIDANCE ON THE PROVISION OF COMMENTS**

11. Comments should be submitted through the Codex Contact Points of Codex members and observers using the OCS.
12. Contact Points of Codex members and observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.
13. Other OCS resources, including the user manual and short guide, can be found at the following link: <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>.
14. For questions on the OCS, please contact [Codex-OCS@fao.org](mailto:Codex-OCS@fao.org).

**Appendix**

**(Replies to this questionnaire should be submitted through the OCS as instructed above)**

1. To address COVID-related or other supply chain disruptions, has your country/region offered flexibilities (including exemptions) in labeling food products to maintain availability to consumers? If so, what flexibilities did you offer? If you did not offer flexibilities, why not?
2. In particular, was there a need to redirect foods intended for catering purposes into the retail market? If so, how were differences in labeling requirements accommodated?
3. Were there concerns related to either public health or transparency with providing flexibility regarding ingredient substitution? If your country or region did not provide such flexibilities, what guidance would be helpful for you to make provisions to address future supply chain disruptions?
4. Were there provisions in labeling developed to ensure consumers have the needed information on a temporary basis? (e.g. stickering)
5. Are there technology-based approaches to enable labeling flexibilities which could improve supply chain resilience that also support both trade and consumer transparency during emergencies or other supply chain disruptions?
6. Which provisions of existing Codex texts provide for labelling flexibilities? If these provisions are not sufficient, which provisions (if any) might be amended to provide such flexibilities?