

21 April 2016

**CODEX COMMITTEE ON FOOD LABELLING
(Forty-third Session)**

Ottawa, Ontario, Canada, 9 - 13 May 2016

European Union Comments on

Agenda item 6:

**DISCUSSION PAPER ON LABELLING OF NON-RETAIL
CONTAINERS (Prepared by India)
(CX/FL 16/43/6)**

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) would like to thank India for the preparation of the discussion paper and its attached Project Document.

The EUMS recognise that Codex labelling Standards and Guidelines do not always address the particular labelling of non-retail containers. While specific labelling regimes for the labelling of non-retail containers already exist in some Codex Standards, the EUMS support the development of general rules applying for non-retail containers.

The EUMS believe that labels may not be the only means to ensure the circulation of the necessary information and that commercial document accompanying the food product can fulfil this requirement. The EUMS would like to keep the scope of this new work large enough to allow for the consideration of the possibility to transmit the information by other mean than the label. The current drafting of the Project Document limits the means to transmit the information to the labelling.

Information to be provided on the label should be kept to a minimum, while additional information could be provided via accompanying documents, as this is already the case in current Codex standards, like, for example, the General Standard for Cheese (CODEX STAN 283-1978), but also like the draft text on Guidance for the labelling of non-retail containers of food annexed to the discussion paper.

The EUMS therefore propose to replace the term 'labelling'/'label' by 'information' where appropriate.

The title should therefore be revised as follows:

'Revision of the General Standard for the Labelling of Prepackaged Food (CODEX STAN 1-1985) to include guidance for the ~~labelling of~~ **information on, or accompanying** non-retail containers of food'

Likewise, the beginning of the first sentence could be corrected as follows:

'The proposal seeks to initiate work on development of guidance for **information on, or accompanying** ~~labelling of~~ non-retail containers of food'

Similar corrections would be need throughout the Project Document.

The EUMS would like to draw the attention of the Committee to the articulation between the rules for the information on or the labelling of non-retail containers already laid down in certain Codex standards and any new general provisions that would be proposed, as it is not clear in the Project Document whether the new provisions would have the objective to replace or to complement the existing ones, or to apply only to the foods that do not benefit from specific provisions. The EUMS are of the opinion that such general rules would complement the specific rules and therefore request the addition of the following sentence in the paragraph '6. Information on the relation between the proposal and other existing Codex documents as well as other on-going work' of the working document:

'The general rules for the provision of information on non-retail containers would apply without prejudice to the specific rules included in relevant Codex standards.'

It should also be noted that as a result of introduction of new general rules, specific rules in other Codex standards may have to be amended to take account of the new general rules

Regarding the place to insert the new rules for the information on non-retail containers, the EUMS favour a dedicated chapter of the General Standard for the Labelling of Prepackaged Food to deal with them.