

Annex 3 - Innovation - use of technology in food labelling

**PLEASE SEND YOUR RESPONSE TO: Codex Contact Point for Canada at HC.Codex.Canada.SC@Canada.ca
BY 29 JUNE 2018**

To help inform the development of the CCFL Discussion Paper on this topic, we request Codex members to provide responses to the following questions about current practices, issues, and any potential role for CCFL on this topic. Please enter your name / contact details as requested below also when responding.

Name of Codex Member Country, Member Organisation, or Observer (and e-mail contact details):				European Union	
General Questions:					
1. Within your country / region, what is the current practice for the use of technology, such as websites, in food labelling? Is the practice used or proposed (e.g. under development); mandatory/regulatory or voluntary?					
Name of current labelling and/or practice	Country or Region if applicable	Implemented (using) or proposed	Mandatory / Regulatory or Voluntary	Who developed the labelling? (Government, Industry, other organisation?)	Relevant references and/or weblinks. If relevant, what does the label look like on pack? (provide a picture if possible)
1) As a general rule Article 12(2) of Regulation (EU) No 1169/2011 on food information to consumers lays down that in case of the prepacked food, the mandatory food information shall appear directly on the package or on a label attached thereto.	European Union	1) Article 12(2) is implemented	Mandatory	1) European Union	https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1169 (legislative text of Regulation (EU) No 1169/2011)
2) Article 12(3) of the Regulation (EU) No 1169/2011 foresees that to ensure that consumers benefit from other means of provision of		2) Article 12(3) is subject to the adoption of a delegated act and			

<p>mandatory food information better adapted for certain mandatory particulars, the Commission may establish criteria subject to which certain mandatory particulars may be expressed by other means other than on the package or on the label. The precondition for this is that the same level of information as by means of the package or the label is ensured and there is evidence of uniform consumer understanding and the wide use of these means by the consumers.</p> <p>Furthermore, Article 12(4) provides that the Commission may adopt implementing act on the modalities of application of the criteria in order to express certain mandatory particulars by means other than on the package or on the label.</p>		<p>an implementing act not adopted yet.</p>			
<p>2. Are you aware of existing international guidelines or other relevant work undertaken in other international fora on this topic? If so, please provide relevant reference(s) or website links to access this?</p>					
<p>Yes / No</p>	<p>Details of existing international guidelines or other relevant work in other international fora:</p>				
<p>No</p>					
<p>3. What are the issues that you think need to be addressed by CCFL for this topic? Please give a reason(s) for your answer of why it is important (e.g. there is a gap on innovation and the use of technology in food labelling in Codex text(s), clarity is needed on innovation and</p>					

the use of technology in food labelling for consumer information/choice, etc.).

Issue(s)	Reason(s) for answer
<p>Adoption of criteria subject to which certain or all mandatory particulars may be expressed by other means than on the package or on the label.</p> <p>In order to ensure uniform implementation of those criteria, the modalities of application of those criteria should be clarified.</p>	<p>It should be acknowledged that there is a continuous evolution in the way in which information is provided to consumers, moving from traditional to digital means. This evolution should also be taken into account at Codex level and in particular, in the area of food labelling/information. Criteria should therefore be defined at Codex level to ensure harmonisation at international level of these aspects.</p> <p>Although, the EU is not at the stage of moving from traditional to digital means, this possible future approach should be prepared at international level.</p> <p>Modalities of application of the criteria should also be defined at Codex level to ensure a harmonised implementation at international level.</p>

Specific Questions: for Innovation – Use of technology in food labelling

4. Within your country are there examples where technology is used for conveying labelling or similar information on products that are not foods? If so, please provide a description.

The European Travel Retail Confederation currently carries out a pilot project to create a digital platform for information to consumers in duty free and travel retail, across three core categories: Food & confectionery; Alcohol beverages; and Perfumes & Cosmetics. The purpose of the pilot project is to provide information by means other than on the package or on the label but accessible directly from the product itself, in all EU languages as well as third country languages, where relevant, and in a format that is useful and relevant to consumers in a travel environment.

Product information will be accessible directly from the barcode on the packaging which can be scanned using a smartphone or in-store scanner facilities, or accessible via a website. The platform will allow product information to be available in multiple languages at any time and in a format that is useful and relevant to consumers in a travel environment.

Product information will be provided directly by the suppliers as the responsible business operators, focusing on information that is legally required and does not serve any marketing purposes, displayed on the consumer interface in a standardised format with clear landmarks across all product categories so that consumers can easily find the information they are looking for.

5. What types of technologies are used to convey food labelling information?

In the EU, food information has in all cases to be provided on the package or on a label attached thereto. In addition, the same information may be provided by other means than on the label.

Under the pilot case presented in question 4, barcode would be used to convey food labelling.

QR Code is another possible mean of providing information:

http://ec.europa.eu/ipg/standards/qr_code/index_en.htm

<https://www.iso.org/standard/62021.html>

6. What could be some advantages and challenges on the use of technology in food labelling to be taken into account by CCFL when exploring this subject?

It would be an advantage as through these new technologies:

- there would be no space constraint compared to a label and the information can for instance be more easily provided in several languages;
- the legibility can be improved and more user friendly ways of providing information can be explored;
- there would be the possibility for food business operators to provide additional voluntary information and for consumers to access to additional relevant information.

It would also be a challenge as:

- not all consumers are equipped with the needed instrument to access off label information;
- it has to be ensured that the same information which is provided on the side is also available at home.
- It has to ensure easy product comparison;
- A standard presentation should be ensured in order to avoid confusing consumers;
- the other means of providing food labelling information should not be used for marketing/promotional purposes.