## CODEX COMMITTEE ON FOOD LABELLING

## EUROPEAN UNION COMMENTS ON CODEX CIRCULAR LETTER CL 2019/86-FL:

## "LABELLING OF ALCOHOLIC BEVERAGES"

Mixed Competence European Union Vote

In response to the request for comments on labelling of alcoholic beverages of the Codex Circular Letter CL 2019/86-FL, the European Union and its Member States (EUMS) would like to make the following comments:

a) On whether alcoholic beverages fall under the Codex definition of food, as it is stated in the Procedural Manual and the Codex Standard on Labelling of Prepacked Food:

For the purposes of the Codex Alimentarius food is defined as 'any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances used only as drugs'.

The EUMS consider that alcoholic beverages fall under the definition of food as it is stated in the Procedural Manual, and that several Codex texts relating to food safety already specifically address alcoholic beverages.

The existing General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) and the Guidelines on Nutrition labelling (CAG/GL 2-1985) apply to all prepackaged foods, including alcoholic beverages. The EUMS consider that alcoholic beverages fall under these two Codex documents.

## b) On the recommendations provided in CX/FL 19/45/10:

The EUMS support Recommendation 3, namely to initiate new work to provide clarity in the existing General Standard for the Labelling of Prepackaged Foods (CXS1-1985) and the Guidelines on Nutrition Labelling (CXG2-1985) on their applicability to alcoholic beverages and to consider revisions of these two Codex texts in terms of labelling of alcohol content of alcoholic beverages.

The EUMS consider the requirement for the indication of the alcohol content of alcoholic beverages, as important information for the consumers that allows them to make an informed choice. The EUMS, therefore, support pursuing work on the labelling of alcohol content on alcoholic beverages.

The EUMS consider that the question whether possible specificities of alcoholic beverages would justify specific approaches for providing nutritional information could be discussed in the CCFL. In that regard, the EUMS would not be opposed to Recommendation 2.