



GFORSS | GLOBAL FOOD REGULATORY
SCIENCE SOCIETY

ANALYSIS OF AGENDA ITEMS AND PREPARATION FOR THE 46th SESSION OF THE CODEX COMMITTEE ON FOOD LABELLING (CCFL46)

27 Sept – 07 October 2021 Virtual Meeting

AGENDA ITEMS 5: Draft Guidance for the Labelling of Non-Retail Containers – at Step 6

Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 46th session of the Codex Committee on Food Labeling, scheduled to take place virtually from 27 September to 07th October, 2021. The document is intended for possible use by the Codex communities of practice promoted by [GFORSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GFORSS](#)), their membership or their management.

This analysis is prepared as part of the **Codex Initiative for the Middle East and North Africa: MENA Codex Initiative**, implemented by [PARERA](#) and [GFORSS](#) and funded by the US Codex Office, US Department of Agriculture.

This analysis has identified that the most relevant agenda items are agenda items 5, 6 and 8 where progress would be desired.

Agenda Item 5 Draft Guidance for the Labelling of Non-Retail Containers – at Step 6

Documents

- ❖ [REP19/FL, Appendix II](#) – CCFL45 meeting report (2019) - Draft Guidance for the labelling of non-retail containers
- ❖ [CX/FL 21/46/5](#) - Draft Guidance for the Labelling of Non-Retail Containers
 - Comments in reply to [CL 2019/85/OCS-FL](#)
- ❖ [CX/FL 21/46/5 Add.1](#) - Draft Guidance for the Labelling of Non-Retail Containers: revised draft
- ❖ [CX/FL 21/46/5 Add.2](#) - Draft guidance for the labelling of non-retail containers
 - Comments in reply to [CL 2021/45/OCS-FL](#)

**It is important to note that experts – members of the Expert Working Group (EWG) – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the EWG proceedings is based on each expert's own credentials and experience which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

Background

At its 43rd Session, CCFL recommended to start new work on guidance for the labelling of non-retail containers of food through an electronic working group (eWG) chaired by India and co-chaired by the United States and Costa Rica. The draft guidance was discussed at CCFL44 and 45. It was then adopted at Step 5 by CAC42.

The postponement of CCFL46 permitted additional time to consider the comments received, including further analysis.

The Canadian CCFL Secretariat and the Chair of the eWG (India) analyzed the comments. Some changes were made to the draft guidance in alignment with the comments received.

Analysis

The purpose of the standard is to “facilitate appropriate harmonized labelling of non-retail containers of food and to outline what information should be presented on the label “, including what information should be provided by other means. Non-retail containers of food are defined in the draft guidance as “any container that is **not intended** to be offered for direct sale to the consumer, rather for further food business activities before being offered to the consumer.

The eWG chair supported by the Canadian Secretariat of CCFL offered a documented approach as to the way comments were considered.

Comments addressed some aspects related to the structure of the document, and clarifying some guidance in relation with information on the label in the same field of vision, Relabeling or supplementary labelling, etc.

The CCFL will be considering the latest version of the document with the possibility of moving the guidance for adoption at Step 8 by CAC 44.

The Committee will be asked to consider whether the document developed is a standard or a guideline.

Upon reaching the recommendation for adoption, the proposed text would serve as the basis for amendments to the Codex procedural manual, removing current provisions speaking to non-retail containers and referencing the guidance as the basis for such labelling practices: “the labeling of non-retail containers should be in accordance with the Guidance (Standard / Guideline) on the labelling of non-retail containers”.

Commodity committees would also be informed of the finalization of the guidance, which may lead to consequential amendments to some Codex Commodity standards.

The amendment to the Procedural manual and consequential amendments would contribute to having one single Reference Point for guidance on non-retail containers.

Considerations for the region

- ❖ Comments were already provided on the proposed text by Iraq, Saudi Arabia and Egypt.
- ❖ Support was offered to consider this text as a Standard (not a guideline) as it fulfills all the requirements of a Codex standard

Conclusion

Considering the comments received and how thoroughly they were addressed, this text is close to garnering consensus under the current draft.

Some minor adjustments for clarification may be suggested during the meeting, with the objective to have Codex text move towards adoption at step 8 and serve as the basis for any labelling provisions related to Non Retail Containers.

