



## 49<sup>th</sup> Joint Coordination Meeting of Arab and CCNE Codex Contact Points

**PREPARATION FOR ITEMS (6) IN PREPARATION FOR THE 49<sup>th</sup> SESSION OF  
THE CODEX COMMITTEE ON FOOD LABELLING (CCFL49)**

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# OBJECTIVES

- Support effective participation in CCFL49
- Enhance technical preparedness on Agenda Item 6
- Facilitate development of aligned national and regional positions
- Identify key areas requiring further clarification to support consistent implementation

# Background

- Work initiated at CCFL47 & CCFL48
- Focus on multipack & joint presentation foods
- Clarifies application of GSLPF

# Current Status of Work

The 47th Session of the Codex Committee on Food Labelling (CCFL47, 2023) considered the project document and agreed to start new work on the labelling of foods sold in joint presentation and multipack formats.

CCFL47 also established an Electronic Working Group (EWG), chaired by Colombia and co-chaired by Jamaica, to prepare a preliminary draft text for consideration at CCFL48.

CCFL48 considered the proposed draft Provisions relevant to joint presentation and multipack formats, returned them to Step 2/3 for further consideration, and re-established an EWG chaired by Colombia and co-chaired by Canada, India and Jamaica, to continue drafting the guidelines, taking into account the discussions and written comments submitted at the session for circulation for comments at Step 3 and consideration by CCFL49.

# Analysis

The draft amendments aim to address regulatory ambiguity in applying the GSLPF to complex packaging formats. While the existing standard is broadly applicable, it lacks sufficient specificity, leading to inconsistent interpretation across product types and jurisdictions. Multipack and joint presentation formats introduce specific challenges related to:

- The placement of mandatory information.
- Representation of product composition.
- Communication of quantity and date information.

## Overall Regulatory Balance

The amendments strike a balance between flexibility and harmonization by emphasizing practical implementation and general principles. While this supports adaptability, it may also increase reliance on national interpretation and reduce uniformity.

## **Mandatory Information (Section 8.1.3.1)**

This section establishes that mandatory information must be accessible either on the outer packaging or clearly visible on inner units. It reflects a functional approach focused on information accessibility rather than strict placement. While broadly supported, differing views remain regarding requirements when information varies between inner and outer packaging.

## **Ingredient Labelling (Section 4.2.1)**

The provision allows flexibility between separate or combined ingredient lists based on product characteristics. This represents a compromise between differing Member views, enhancing flexibility but potentially reducing consistency in interpretation.

## **Net Contents (Section 4.3.4)**

Divergent views led to a flexible approach allowing declaration of total contents, individual units, or both. While this reduces regulatory burden, it may introduce variability in application and reduce comparability.

## **Date Marking (Section 4.7.1 )**

The requirement to declare the earliest applicable date, including safety-related dates where relevant, is widely supported and aligns with consumer protection principles. However, implementation challenges remain in cases involving multiple date types and mixed-product configurations.

## **Definitions and Interpretation**

No formal definitions for “multipack” and “joint presentation” are introduced. While this avoids changes to existing Codex definitions, it may lead to variability in interpretation across jurisdictions.

## Section 4.2.1 List of Ingredients

The proposed text provides useful flexibility by allowing either separate or combined ingredient lists depending on product characteristics. However, further guidance is recommended to:

- Specify when separate ingredient lists are required for each unit
- Clarify how claims on individual units should be reflected on outer packaging
- Address situations where inner units are redistributed individually

This will support consistent interpretation and prevent misleading information.

## Section 4.3.4 – Net Contents

For improved clarity and consistency, it is recommended that:

- The total net contents of the outer package be declared
- The number and net contents of individual units be indicated where relevant

The use of “and/or” may lead to inconsistent application. Therefore, clearer guidance is needed to define when each declaration is required.

This variability may affect consumer understanding and product comparability across markets.

## Section 4.7.1 (vi) bis

The requirement to declare the earliest applicable date is strongly supported as it enhances consumer protection. However, further clarification is needed regarding:

- Handling multiple date types (e.g. best-before vs use-by) within the same multipack
- Products originating from different production batches
- Responsibilities when multipack composition changes

Therefore additional detailed guidance suggested to ensure clarity and proper implementation.

## Section 8.1.3.1

While the draft avoids introducing formal definitions for “multipack” and “joint presentation,” this may create regulatory uncertainty, particularly in borderline cases.

Providing additional clarification or explanatory guidance would support consistent and harmonized implementation across countries.

# Conclusion

The draft provisions represent an important step toward improving clarity and flexibility in the labelling of multipack and joint presentation foods. However, targeted clarification in key areas remains essential to ensure consistent global implementation, effective consumer protection, and reduced regulatory ambiguity

# References

- Codex Alimentarius Commission. General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985, Revised 2024). Rome: FAO/WHO. Available at: <https://www.fao.org/fao-who-codexalimentarius>
- Codex Committee on Food Labelling (CCFL49). Agenda Item 6: Proposed Draft Provisions Relevant to Joint Presentation and Multipack Formats. Document CX/FL 26/49/6. Ottawa, 2026.
- Codex Committee on Food Labelling (CCFL48). Report of the 48th Session of the Codex Committee on Food Labelling. FAO/WHO, 2024.
- Codex Committee on Food Labelling (CCFL47). Report of the 47th Session of the Codex Committee on Food Labelling. FAO/WHO, 2023.

