

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda item 4(D)

CX/FL 10/38/9

DISCUSSION PAPER

**LABELLING PROVISIONS DEALING WITH THE FOOD INGREDIENTS IDENTIFIED IN
THE GLOBAL STRATEGY ON DIET, PHYSICAL ACTIVITY AND HEALTH**

PREPARED BY

AN ELECTRONIC WORKING GROUP CO-CHAIRLED BY NORWAY AND CANADA

WITH ASSISTANCE FROM

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BACKGROUND

1) The WHO *Global Strategy on Diet, Physical Activity and Health* has four main objectives, three of which can be linked in part to the work of CCFL:

- Reduce risk factors for chronic diseases that stem from unhealthy diets and physical inactivity through public health actions.
- Increase awareness and understanding of the influences of diet and physical activity on health and the positive impact of preventive interventions.
- Develop, strengthen and implement global, regional, national policies and action plans to improve diets and increase physical activity that are sustainable, comprehensive and actively engage all sectors.

2) The eWG was asked to examine labelling provisions dealing with the food ingredients identified in the Global Strategy. Paragraph 22 of the Global Strategy identifies that for diets, recommendations for populations and individuals should include ways to increase the consumption of fruits and vegetables, and legumes, whole grains and nuts and limit the intake of free sugars and the consumption of salt (sodium) from all sources. The term “free sugars” is used in the Report from the Expert Consultation and refers to all monosaccharides and disaccharides added to food by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and fruit juices.

3) Paragraph 59 of the Global Strategy states: Public health efforts may be strengthened by the use of international norms and standards, particularly those drawn up by the Codex Alimentarius Commission. Areas for further development could include: labelling to allow consumers to be better informed about the benefits and content of foods; measures to minimize the impact of marketing on unhealthy dietary patterns; fuller information about healthy consumption patterns, including steps to increase the consumption of fruit and vegetables, whole grains, legumes and nuts. Involvement of governments and nongovernmental organizations as provided for in Codex should be encouraged.

4) At the 36th session of the CCFL, the Committee considered comments received on Agenda Item 2(B) Items Referred by FAO and WHO: Implementation of the WHO *Global Strategy on Diet, Physical Activity and Health* (CX/FL 08/36/3) on Proposed Action 3.1: Include paragraph 5.1.1 (e) “is the subject of an express or implied claim about the presence of any fruits, vegetables, whole grains or added sugars” in any of the requirements for the quantitative declaration of ingredients”.

5) As noted in CX/FL 08/36/3, Paragraph 11, the great majority of member states did not support this proposal in their written comments. They noted that this section was not necessary because requirements to declare the quantities of emphasized ingredients already exists, that the presence of these ingredients would not necessarily make a food healthful and the list of healthful ingredients was not complete. It was suggested that express or implied claims regarding the presence of healthful ingredients should be considered in relation to the Codex *Guidelines on Claims* and the Codex *Guidelines on Use of Nutrition and Health Claims*. There was no discussion of this proposal during the discussions on the implementation of the Global Strategy.

6) During discussions at the 36th CCFL, it was proposed to convene an eWG in order to not lose sight of the ingredients identified in the Global Strategy and broaden the mandate of the requested work to evaluate revisions needed to Codex texts on food labelling in light of the Global Strategy; to consider the food ingredients identified in the Global Strategy; and identify and recommend work to be undertaken by the CCFL with regard to these action items. An intersession eWG led by Norway solicited comments from member states and organizations which were presented in a preliminary report, CRD 1, at the 37th session of the CCFL. There was general agreement by the Committee to reconvene the electronic working group, co-chaired by Norway and Canada, to continue and complete its work. The terms of reference for the eWG were outlined as follows:

7) Considering the food ingredients identified in paragraph 22 of the Global Strategy on Diet, Physical Activity and Health, i.e., fruits and vegetables and legumes, whole grains and nuts, and free/added sugars and salt (sodium), the electronic working group will:

- review and revise the list of proposed actions in CRD 1 in order to focus on those ingredients identified in the Global Strategy as mentioned above
- identify paragraphs in existing Codex texts on food labelling under which food ingredients identified in the Global Strategy can be addressed; and
- prepare a discussion paper for consideration by the 38th session of the CCFL.

INTRODUCTION

8) According to the World Health Organization's *Global Strategy on Diet, Physical Activity and Health* (Global Strategy), non-communicable diseases are a large contributor to population mortality and the global burden of disease. Unhealthy diets are one of the leading causes of non-communicable diseases like cardiovascular disease, type 2 diabetes and certain types of cancer. Inadequate intake of fruit and vegetables and consumption of energy-dense, nutrient poor foods that are high in fat, sugar and salt are factors that increase the risk of non-communicable diseases. This emphasizes the importance of a healthy diet for populations and individuals.

9) Different tools can be used to contribute to achieve the overall goal. It is important to give factual food information that enables consumers to make fully informed choices on matters that could affect their health. International and national authorities give recommendations for healthy diets, and it is important that consumers are provided with relevant information to assist them in making healthy food choices. Some of the tools that can be further developed to assist in reaching the objectives of the Global Strategy are improvements to food labelling requirements, particularly the standards set through Codex Alimentarius. It is recognized, however, that food labelling alone will not be sufficient in fully attaining the objectives of the Global Strategy.

SUGGESTED ACTIONS TO BE CONSIDERED BY CCFL

10) The text below provides a summary of the suggested actions that the eWG proposes could be considered by the Committee to assist in implementing provisions that might deal with some of the ingredients identified in the Global Strategy.

Table 1. Suggested Actions to be Considered

I	Enhanced Guidelines on Health Claims and Claims Related to Dietary Guidelines or Healthy Diets in <i>Guidelines for Use of Nutrition and Health Claims</i>	Consider for New Work: Suggested Text
II	Use of Standardized Symbols to Represent the Ingredients Identified in the Global Strategy in Food Labelling	Consider: Development of a Discussion paper by a further eWG
III*	Nutrient Content Claims on the Non-Addition of Sugar or Salt	Consider for New Work: Suggested Text
IV*	Addition of Explicit Comparative Claims for Added Sugar and/or Sodium	Consider for New Work: Suggested Text
V	Developing Common Definitions of the Ingredients Identified in the Global Strategy	Consider for New Work: Suggested Text

* The eWG also recommends that the Committee consider amending the name of the Table following section 8.6 in the *Guidelines for Use of Nutrition and Health Claims* for further clarity to read: Table of conditions for nutrient content (and ingredient) claims

I. SUGGESTION TO CONSIDER NEW WORK - ENHANCED GUIDELINES ON HEALTH CLAIMS AND CLAIMS RELATED TO DIETARY GUIDELINES OR HEALTH DIETS IN *GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIMS*

11) Given that the reference to “increase consumption of fruits, vegetables, whole grains, nuts or legumes” is in the form of dietary guidance in the Global Strategy, it may be appropriate for CCFL to consider provisions related to dietary guidance with respect to increased consumption of foods or food categories in Sections 7 and 8 in the *Guidelines for Use of Nutrition and Health Claims*.

12) Provisions for claims in the *Guidelines for Use of Nutrition and Health Claims* do not supersede the prohibitions shown in the *General Standard for the Labelling of Prepackaged Foods* (GSLPF), specifically the prohibition for describing or presenting foods in a manner that is false, misleading or deceptive or is likely to create an erroneous impression. Dietary guidance related to increasing the consumption of the ingredients specifically identified in the Global Strategy must be used in a manner that promotes healthful consumption of the ingredients and does not encourage the spurious use of claims on foods where it is not appropriate to do so. Suggested text could read as follows:

8.7 Dietary guidance statements about consumption of certain food categories such as fruits, vegetables, and whole grains may be presented on food labels in a manner that is truthful and not misleading and in accordance with relevant dietary guidelines and nutrition policy recognized by the competent authority.

13) CCFL could consider whether more general guidance could be provided within section 7 on Health Claims that would address the need for a minimum amount of a food component or food ingredients as a qualifying criterion for health claims in which increased consumption of a

food constituent or foods (including food category) – such as fruits, vegetables, nuts, whole grains, etc. is recommended. Conditions setting a minimum amount of a nutrient have been established for claims related to constituents in foods for which a Nutrient Reference value is established in section 7.1.4. This proposal would simply mirror this requirement but for food ingredients and would leave flexibility as to the minimum amount left to competent authorities such that the amount required to be present in a food in order to make the claim could be decided based on national dietary patterns and requirements. Alternately, the Committee may wish to refer this to CCNFSDU for their consideration if a minimum amount of a food ingredient needs to be present.

14) This could complement the concept already stated in 7.1.3 that the health benefit should be realized through the consumption of a reasonable amount of a food (or food constituent) in order to qualify to make a health claim. This also complements the principle presented in section 7.2: The health claim should not be made if it disparages good dietary practice. Where general health claims are made related to one of the ingredients identified in the Global Strategy, the food should have to contain a minimum amount of that ingredient in relation to the reasonable amount needed to be consumed to obtain the beneficial health effect. This should reduce the possibility of the misleading use of health claims, including function claims or reduction of disease risk claims on foods which do not contain sufficient amounts of the named ingredient(s).

15) Suggested has been underlined below and could be placed, either as part of 7.1.3 or as a stand alone section either immediately preceding or following 7.1.4:

7.1.3 The claimed benefit should arise from the consumption of a reasonable quantity of the food or food constituent in the context of a healthy diet. The conditions for claims which are related to the consumption of a food or food category should stipulate the presence of a minimum amount of the food(s) or food component that is the subject of the claim.

Additionally, it may be appropriate to consider also adding this to section 8 on claims on dietary guidance.

II. SUGGESTED CREATION OF A SEPARATE EWG ON THE USE OF STANDARDIZED SYMBOLS TO REPRESENT THE INGREDIENTS IDENTIFIED IN THE GLOBAL STRATEGY IN FOOD LABELLING

16) Many countries are currently considering the use of standardized symbols due to the proliferation of various “front-of-package” (FOP) labelling systems world-wide. On the topic of symbols, it was the intention of the eWG to stay away from the topic of FOP nutrition labelling schemes and focus on other systems of symbols that would represent serving sizes or amounts or food categories or groups – such as fruits and vegetables or whole grains.

17) The conditions set out for Claims Related to Dietary Guidelines or Healthy Diets in section 8 of the *Guidelines for Use of Nutrition and Health Claims* also describe the conditions for claims related to “healthy diets” and the restriction on representing foods as “healthy” or as imparting health. Many FOP symbols now being seen worldwide are symbols which represent foods as being a “healthy choice” based on the use of one or more conditions to classify them as

such. Some conditions are related to the presence of the ingredients identified in the Global Strategy. What is notable is the lack of consistency of conditions between programs thus leading to consumer confusion as to the meaning of the symbols and lessening their ability to make informed purchasing decisions.

18) With many countries examining a path forward on various FOP systems, it may be opportune for the CCFL to start to consider developing guidance on how these systems should integrate conditions related to the ingredients identified in the Global Strategy. The work could also ensure that these systems align with the guidance provided in section 8.5 of the *Guidelines for Use of Nutrition and Health Claims*. This may be of assistance to both countries already examining the issue and those that have yet to start to look at it. Many jurisdictions are currently studying the topic and their research, as related to the proposed area of investigation, may be able to help shape some of the knowledge base on application, consumer use and need for such programs, etc. This might then be used to help inform further discussions at CCFL on this topic.

19) The eWG recognizes that the topic of standardized symbols may go well beyond the scope of a discussion on the ingredients identified in the Global Strategy. However, part of the Terms of Reference of CCFL is to study problems associated with the advertisement of foods with particular reference to claims and to study problems associated with labelling assigned by the Commission. Therefore it is suggested that CCFL consider this topic separately through an electronic working group to exchange information and begin to explore the etiology of such systems and their use worldwide. The Chairs of the eWG suggest that as related to the Global Strategy that this work focus on the use of symbols and pictorials related to the ingredients identified in the Global Strategy and symbols related to the identification of “healthy choices”, as indicated above. This may help determine if further work by the Committee might be useful and the scope of any further consideration within the Codex mandate.

20) Additionally, an eWG participant also reminded the eWG that the WHO is currently undertaking work in the area of nutrient profiling as part of its effort to strengthen scientific advice on nutrition (paragraph 29 of ALINORM 10/33/26; paragraph 12 of CX/NSFDU 09/31/2-Add-1). The participant recommended that CCFL should also consider the advice of the WHO on this topic prior to commencing work in this area so that the CCFL would be informed on the WHO’s guidance on nutrient profiling. In order to take this recommendation into account, CCFL should seek feedback from the WHO in regards to their timeline for releasing guidance and consider creating an eWG that would span a 2 year time period in order to thoroughly consider the various issues.

21) In order to facilitate striking a new eWG, the Chairs of this eWG have suggested that the proposed terms of reference for the eWG could be as follows:

- Develop a discussion paper on front of package use of pictorials, symbols, images, pictures, et cetera which indicate the presence in a prepackaged food of vegetables, fruits, whole grains, nuts, legumes or which indicate that a food is a “healthy (or healthier) choice”.

- The discussion paper should include a compendium of these systems in various jurisdictions with a description of etiology.
- The eWG should consider:
 - i. The need for general guidance on the use of this type of labelling beyond the current provisions in Codex text, particularly key considerations and criteria;
 - ii. Guidance provided by the WHO on nutrient profiling and its impact on the use of “healthy(ier) choice” symbols;
 - iii. What has been and/or needs to be further explored through social science research to support any guidance; and
 - iv. The feasibility and practicality of developing standardized symbols for international use.

III. SUGGESTION TO CONSIDER NEW WORK: ADDITION OF NUTRIENT CONTENT CLAIMS ON THE NON-ADDITION OF SUGARS OR SALT

22) The Committee should consider establishing new nutrient content claims in the *Guidelines for Use of Nutrition and Health Claims* for the non-addition of salt and/or sugars so that these claims are made in a manner that is truthful and not misleading. In order to provide consumers with information about the non- addition of sugars and/or salt in a food and encourage manufacturers to modify formulations to create healthier products, the below-mentioned claims are suggested to be included in the *Guidelines for Use of Nutrition and Health Claims*, in the table in section 8.6.

23) For claims of the non-addition of both salt and sugars, it is important to bear in mind section 5 of the *General Guidelines on Claims*. Conditional claims point 5.1(v) and 5.1 (vii).

- Point 5.1(v) states that “claims that a food has special characteristics when all such foods have the same characteristics (should be permitted) if this fact is apparent in the claim”. This means that a product having the same characteristics (e.g. “no added sugars”) as similar products on the market may bear a claim about this characteristic as long as the fact that this characteristic (e.g. “no added sugars”) also applies to similar products appears on the label.
- Point 5.1(vii) outlines that claims which highlight the absence or non-addition of one or more nutrients should be regarded as nutrition claims and therefore should invoke mandatory nutrient declaration in accordance with the *Codex Guidelines on Nutrition Labelling*.

24) There is the potential for these types of claims to be misleading if the food itself actually does contain intrinsic sugars or sodium, but may not contain “added” sugars and/or salt/sodium. For instance, fruit juice may not be sweetened, but does inherently contain sugars. Similarly, a few foods contain sodium in their natural state, such as milk and seafood. One mitigating factor already in place is the requirement in section 3 of the *Guidelines on Nutrition Labelling* for nutrition labelling on foods for which nutrition claims are made. This would ensure that

consumers are given access to the amount of the nutrient for which the nutrition claim is made – for instance sugars in grams per 100g/serving in the case of a “no added sugars” claim on a fruit juice. To provide further clarity to consumers, the EU requires a statement “contains naturally occurring sugars” to be present on the label if sugars are naturally present in the food and the claim “with no added sugars” is used. Another approach with a caveat statement might be that of the US: “this product is not “sugar (salt/sodium)-free” or is not “low calorie”” and that further directs the consumer’s attention to the nutrition information provided on the label.

25) Careful deliberation on the conditions for these claims is a necessity in order to prevent these claims from misleading consumers as to the true nature of a food. The deliberations must consider the amount of information necessary on the label to provide clear information and the potential impact or burden on the industry if there is no demonstrated effectiveness for consumers.

26) The suggested claim “unsweetened” did not gain unanimous support among the eWG. Some indicated that this claim would be considered by consumers as identical to “no added sugars” and that consumers would not be able to distinguish the subtlety with respect to the “sweetening” role that low Calorie or non-nutritive sweeteners play in replacing sugars. Still others indicated that there would be merit in including this claim. The proposal is that the conditions for this claim be identical to “no added sugars”, but would also not allow for the addition of artificial or non-nutritive sweeteners (such as aspartame, sucralose, acesulfame-potassium, saccharin or cyclamates) or sugar alcohols to the food. This provides for the use of an additional claim “unsweetened” which would be synonymous with “no added sugars” but would include the non addition of other forms of low calorie/non-calorie sweeteners in order to avoid misleading consumers with respect to the role of these other forms of sweeteners.

27) Some members indicated there may be potential enforcement issues with verifying the veracity of “No Added (Sugars/salt)” claims. However, the amount of (total) sugars contained in a food would have to be declared if such a claim were to be used according to section 3 of the *Guidelines on Nutrition Labelling* and this amount can be verified analytically. The verification of the use of this type of claim could then be verified additionally through a review of the list of ingredients and through formulation verification.

28) It was also observed that “No Added Sugars” claims were also discussed at the 31st session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) where in their report (ALINORM 10/33/26, para 15-22) the Chairman noted that it was the responsibility of CCNFSDU to develop conditions for nutrient content claims. CCFL is responsible for decisions related to labelling. Therefore, it is the suggestion of this eWG that CCFL consider these claims further, in close consultation with CCNFSDU.

Proposed Text for Consideration: Addition to the Table of conditions for nutrient contents

Component	Claim	Conditions (absence of addition)
Sugars	No added sugars, no sugars added, without added sugars	a. The food contains no added sugars, no ingredients containing added sugars or ingredients that contain sugars that functionally substitute for added sugars; and b. The regular food would normally contain added sugars
Sugars	Unsweetened	Meets the “No added sugars” conditions above and does not contain sugar alcohols or artificial sweeteners.
Salt (Sodium)	No added salt, unsalted, without added salt	a. The food contains no added salt, other sodium compounds*, or ingredients that functionally substitute for added salt; and b. The regular food would normally contain added salt

*sodium compounds include those added to foods for food additive purposes or for other purposes

29) One participant in the eWG also suggested that the Committee also consider the addition of conditions for the claim “No Added Fat” and “No Added Trans Fat”. However, as these were not part of the list of ingredients that the eWG was asked to look at, the eWG must defer to the Committee to determine if additional work should be considered, or the scope of the work proposed above should be expanded.

IV. SUGGESTION TO CONSIDER NEW WORK: ADDITION OF EXPLICIT COMPARATIVE CLAIMS FOR ADDED SUGAR AND/OR SODIUM

30) It is suggested that the Committee also further expand on section 6 in the *Guidelines for Use of Nutrition and Health Claims* and consider explicitly setting out criteria for nutrient comparative claims related to the reduced addition (or presence) of salt (sodium) or sugar to a food. The use of such claims may help to encourage the reformulation by industry of certain foods to contain less added salt (sodium) and/or sugar. In order to make such a claim valid and to account for variation in nutrient content, it is suggested that a minimum reduction for such a claim by at least 25% less than the original food product formulation.

31) Some members felt that the conditions set out in section 6 of the *Guidelines for Use of Nutrition and Health Claims* are sufficient for making these types of claims. However, an eWG member indicated that there is the need for other conditions than those listed in the suggested action to be established - there can be limitations on when such claims are used. For instance, it is not appropriate to use an X% less sodium claim on a food when the food it is being compared to already meets the “low sodium” claim. Thus there may need to be additional criteria set out to ensure that the use of comparative claims related to the level of added sugars or salt is not misleading to consumers.

32) In general, participants who responded favourably to the elaboration of such claims were supportive of the retention of a minimum reduction of 25% in order to make this type of claim

meaningful. However, one member country and several non-governmental organizations indicated that the reduction of sodium often requires an adjustment of the palate and must be done gradually and thus are advocating for a claim where the reduction of sodium in a food could be less than 25% in order to provide incentives to the food industry to reformulate their products. Further feedback was requested with respect to retaining a minimum reduction of 25% for comparative claims. Those members who did respond indicated that reductions less than 25% may not necessarily result in meaningful benefits to consumers and may in fact be misleading in that they may imply more significant reductions than is actually the case. As well, there may be very small absolute reduction in sodium. One suggestion was to base such a discussion on the amount of sodium to be reduced to obtain a health effect. However, this discussion might be more appropriate in terms of the overall diet rather than for individual foods.

33) As in Suggested Action III, one respondent also observed that claims related to added sugars were also discussed at the 31st session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) where in their report (ALINORM 10/33/26, para 15-22) the Chairman noted that it was the responsibility of CCNFSDU to develop conditions for nutrient content claims. CCFL is responsible for decisions related to labelling. Therefore, it is the suggestion of this eWG that CCFL consider these claims further, in close consultation with CCNFSDU.

Proposed Text for Consideration:

Table of conditions for nutrient content

Component	Claim	Conditions
Sugar	X% less sugars	The food contains at least 25% less sugars than the regular food The regular food cannot meet the conditions for a “low energy” food
Salt (Sodium)*	X% less salt (sodium)	The food contains at least 25% less salt (sodium) than the regular food The regular food cannot meet the conditions for a “low sodium” food

*sodium compounds include those added to foods for food additive purposes or for other purposes

34) The eWG also recommends that the Committee consider amending the name of the Table following section 8.6 in the *Guidelines for Use of Nutrition and Health Claims* for further clarity to read: Table of conditions for nutrient content (and ingredient) claims.

V. SUGGESTION TO CONSIDER NEW WORK: DEVELOPING COMMON DEFINITIONS OF THE INGREDIENTS IDENTIFIED IN THE GLOBAL STRATEGY

35) The Global Strategy states that for diets, recommendations for population and individuals should include the following: increase consumption of fruits and vegetables, legumes, whole grains and nuts and limit intakes of free sugars and salt (sodium) consumption from all sources. However, in terms of applying these concepts to the labelling of prepackaged foods, there may be some ambiguity to these terms without further clarification. Currently, section 5.1.1 of the

General Standard for the Labelling of Prepackaged Foods requires that the ingoing percentage of an ingredient (including compound ingredients or categories of ingredients), by weight or volume as appropriate, at the time of manufacture, shall be disclosed for foods sold as a mixture or combination where the ingredient is emphasized as present on the label through words or pictures or graphics. However, without a common definition of some of these ingredients or the categories of ingredients, it may be difficult to know what is characterized in the declaration of the ingoing percentage. The eWG proposes that the Committee develops the definitions of these terms.

36) Particularly, it may be of use to propose a common understanding of the category of ingredients known as “whole grain” for the purposes of food labelling. While some feedback indicated that there was not the need to look at a definition for whole grains, there do seem to be some countries who do agree that this is work that could be considered by the Committee. At this time, the eWG proposes that the definition established by the American Association of Cereal Chemists (AACC) be used as a starting point:

Whole grains: Whole grains shall consist of the intact, ground, cracked or flaked caryopsis, whose principal anatomical components - the starchy endosperm, germ and bran - are present in the same relative proportions as they exist in the intact caryopsis.

Consideration may also need to be given on other aspects of whole grains such as the degree of polishing allowed on brown rice for it to still be considered whole grain.

37) Definitions for the terms “sugars” and “salt” were not discussed during the deliberations of the working group; [however, these may also need to be looked at]. Currently the *Guidelines on Nutrition Labelling* define sugars as “all mono-saccharides and di-saccharides present in food”. Sugars are also defined in the Codex Standard for Sugars (CODEX STAN 212-1999). Salt is the ingredient also known chemically as sodium chloride and is defined in the Codex Standard for Food Grade Salt (CX STAN 150-1985). As it stands currently, there does not appear to be any need to further pursue the definitions of these two terms by CCFL for the purposes of general food labelling. In relation to suggested action III, where the terms salt and sugars refer to added salt and sugars, there may be a need to further elaborate the definitions on these to terms for the purposes of food labelling or more specifically for the identification of ingredients that fall in these categories.

38) The discussion of a definition for fruits and vegetables was also discussed, although there was not general agreement that there was a need for these to be defined. There may be the need for further analysis to determine if there is in fact ambiguity around the term “vegetables” or “fruits”. The use of fruits and vegetables locally may further compound difficulties in this area. Some have questioned if all fruits or vegetables such as starchy vegetables like potatoes and corn are considered to be beneficial as encouraged by the WHO Global Strategy. However, it may be that the recommendations in the Global Strategy are to simply increase overall consumption of fruits and vegetables and not specifically certain fruits or vegetables.

39) Some health claims used in certain jurisdictions may only appear on a restricted list of fruits and vegetables. There may not be an issue here as to the taxonomical grouping of

vegetables or fruits, but rather in relation to vegetables or fruits which may qualify to make certain health claims. This may be more of an issue for competent authorities to consider when reviewing the scientific evidence that supports potential or already permitted health claims. More analysis is required to determine if there is a need to formulate a definition of fruits and vegetables.

40) Placement of these definitions would be most appropriate in section 2 of the *General Standard for the Labelling of Prepackaged Foods* so that when claims are made in relation to these food categories, the definitions are used

APPENDIX I**TEXT REMOVED FROM THE DISCUSSION PAPER AS THERE WAS GENERALLY NO SUPPORT FOR THESE PROPOSALS**

1) The three concepts presented in this Annex received very little support from the eWG. They are provided for information to the Committee. Note that this text has been modified in reflection of comments received during the last round of comments.

I. Addition of Sugars and/or Salt (Sodium) as a Trigger for Mandatory Nutrition Labelling

2) In discussions during the 37th session of CCFL, the Committee agreed to include sodium (salt) and total sugars in the list of nutrients for nutrition labelling. There continues to be debate with respect to terminology for sodium versus salt and for the inclusion of added sugars (still in square brackets). (Ref paragraphs 30 and 36 in the Report (ALINORM 09/32/22)). In addition, the debate whether nutrition labelling should be mandatory or voluntary remains to be resolved.

3) In the event that the Committee reaches the conclusion that nutrition labelling should not become mandatory as a general rule, it is proposed that the Committee consider the option to require nutrition labelling if a food contains added sodium (from all sources) and/or added sugar. This would then provide additional information to consumers as to the amount of the nutrients associated with sugars and salt in the food. This would mean that a new trigger could be added to section 3.1 in the *Guidelines on Nutrition Labelling* that would state:

3.1.2 Nutrient declaration should be mandatory for foods to which sugar and/or salt (and all forms of sodium) are added. (*current 3.1.2 would have to be renumbered to 3.1.3)

II. Collective Names and QUID Labelling

4) Section 4.2 of the existing *Codex Standard for the Labelling of Prepackaged Foods* (GSLPF) require that a list of ingredients appear on food labels in decreasing order by ingoing weight at the time of manufacture. However, experience shows that many consumers have difficulty in interpreting the relative content of ingredients in multi-ingredient foods. In the case of sugars, with many sources of these ingredients in a food – such as sugar, brown sugar, molasses, corn syrup, high fructose corn syrup, honey, maple syrup etc. – more clarity may be provided to consumers if these ingredients were required to be grouped together in the list of ingredients in order to provide an indication of their relative predominance in the list of ingredients. In order to fulfill the objectives listed in the Global Strategy, there is a need for clearer information on the ingredients in foods.

5) The term compound ingredient is described in the GSLPF 4.2.1.3:” Where an ingredient is itself the product of two or more ingredients, such as compound ingredient may be declared, as such, in the list of ingredients, provided that it is immediately accompanied by a list, in brackets, of its ingredients in the descending order of proportion (m/m)...”. However, as the use of multiple ingredients does not meet the concept of a compound ingredient, an alternate approach would have to be explored. Section 4.2.3.1 of the GSLPF allows for the optional use of class

names for certain ingredients. Class names allow for the grouping of similar ingredients under a common group name. Examples include: “starch” for starches other than chemically modified starches and “sugar” for all types of sucrose.

6) It is proposed that where fruits, vegetables, whole grains, nuts, legumes and sugars and salt are present as ingredients in a food, that each of these categories will be required to be named using a collective name, immediately accompanied by a list in brackets, of its ingredient in the descending order of proportion (m/m). The consumer will be able to assess the relative content of these ingredients in the foods they are considering purchasing. For instance, in a food which includes more than one type of single ingredient vegetable, the vegetables would be grouped together under the collective name “vegetables” followed by the disclosure in brackets of the names of the vegetables present in the food. To offset this information, all sources of salt and sugars would have to also be declared under the collective name followed by the list of its ingredients in descending order of proportion in the food (m/m).

7) To further facilitate consumer comprehension of the amount of the ingredients mentioned above present in a food, the ingoing percentage should also be declared (see the example below).

Example of a fruit yoghurt drink:

Illustrating the list of ingredients according to the current requirements in GSLPF paragraph 4.2:

Whole milk, strawberries, apple juice concentrate, sugar, cherries, glucose-fructose, etc

Illustrating the list of ingredients using the class name concept outlined above:

Whole milk, sugars (sugar, apple juice concentrate, glucose-fructose), fruits (strawberries, cherries), etc

Illustrating the list of ingredients using the additional QUID requirement:

Whole milk, sugars (sugar, apple juice concentrate, glucose-fructose)(35%), fruits (strawberries, cherries)(19%), etc

List of Ingredients: Whole milk, sugars (sugar, apple juice concentrate, glucose-fructose) 35%, fruits (strawberries, cherries)19%.

8) This information will contribute to the consumers’ ability to make informed choices and choose healthier foods. Many consumers generally recognize the health consequences of consuming ingredients identified in the Global Strategy; however, they need reliable information about the amounts of those ingredients in multi-ingredient foods. Altering the layout of the list of ingredients as suggested above, will enable the consumers to get accessible information about the total amount of the respective ingredients by use of class names.

9) Some proposed text has been developed below for consideration by the Committee.

Suggested new paragraph in section 4.2.x of the General Standard for the Labelling of Prepackaged Foods, CODEX STAN 1-1985 :

New 4.2.x

Where two or more ingredients are from one of the following categories of foods: fruits,

vegetables, whole grains, legumes, nuts, added salt, or added sugars the appropriate collective name must be used, immediately accompanied by a list of the ingredients in the descending order of proportion (m/m).

Name of Classes*	Collective Names
All single fruits present in the food, with the exception of fruit that has been candied, pickled, powdered, preserved or contained in another ingredient.	Fruits
All single vegetables present in the food, with the exception of vegetables that have been pickled, powdered, preserved or contained in another ingredient.	Vegetables
Grains, as defined by the competent authority which are present in the food in the form defined by GSLPF	Whole Grains
Edible seeds of leguminous plants grown in pods, such as lentils, beans, broad beans, but excluding soybeans and peanuts which must be declared on their own as per 4.2.1.4. Includes dried seeds (pulses).	Legumes
Nuts refer to fruits having a hard outer shell enclosing a kernel such as coconut, almond, walnut, hazelnut, chestnut, cashew and pistachio	Nuts
All sources of monosaccharides and disaccharides added for the purpose of sweetening a food or for replacing other functional roles of sugar in a food. These include sugar, brown sugar, molasses, honey, syrup, concentrated fruit juice, cane syrup, cane juice, etc.	Added Sugars
All sources of sodium chloride in the food, including salt, whether iodized or not, soy sauce, etc.	Salt
*Further work on definitions would need to be completed as necessary.	

New 5.1.4

Where food ingredients are represented by a class name as stipulated in section 4.2.x, the ingoing percentage of the ingredient (m/m) in the final product shall be declared.

10) The proposal to require food labelling in this manner may make the labelling rules even more complex than they already are and may be difficult to enforce. It was noted that they may also lead to some consumer confusion.

III. Enhancing Guidelines on Claims Related to Dietary Guidelines on Healthy Diets

11) In paragraph 22, the Global Strategy states that recommendations for diets “for populations and individuals should include the following:

- Achieve energy balance and a healthy weight
- Limit energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats and towards the elimination of trans-fatty acids
- Increase consumption of fruits and vegetables, and legumes, whole grains and nuts
- Limit intake of free sugars

- Limit salt (sodium) from all sources and ensure that salt is iodized.

12) In order to harmonize the criteria for dietary guidelines with those stated in the Global Strategy, it is suggested that a new section be added following section 8.1 in the *Guidelines for Use of Nutrition and Health Claims* to address the above recommendation from the Global Strategy. The numbering of the rest of section 8 should be adjusted accordingly.

8.2 Claims may be made with respect to the following, if in line with the dietary guidelines officially recognized by the appropriate competent authority:

- Achieve energy balance and a healthy weight
- Limit energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats and towards the elimination of *trans*-fatty acids (in countries where this is an issue)
- Increase consumption of vegetables, fruits, legumes, whole grains and nuts
- Limit intake of added sugars
- Limit salt (sodium) from all sources

13) Further clarity may need to be considered on what products would qualify to make these claims. These claims are meant to be for the whole diet rather than about individual foods. General dietary statements on an individual food may mislead a consumer to believe the food has properties which it does not. Conditions may need to be set to prevent these claims being used in a manner which may be misleading or deceptive.

14) Another alternative may be to provide a reference to the dietary guidance provided in the WHO Global Strategy in the introductory section of the *Guidelines for Use of Nutrition and Health Claims*. Such a reference would provide guidance to national governments about the specific dietary recommendations established by the WHO so that countries may consider these recommendations in drafting national nutrition policy.

APPENDIX II

**CODEX COMMITTEE ON FOOD LABELLING – ELECTRONIC WORKING GROUP
ON LABELLING PROVISIONS DEALING WITH THE FOOD INGREDIENTS
IDENTIFIED IN THE GLOBAL STRATEGY ON DIET, PHYSICAL ACTIVITY AND
HEALTH.**

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