

Brussels, 15 April 2019

ISDI Position: Discussion paper on internet sales/e-commerce

CCFL45: Agenda item 7

General comments:

ISDI supports the new work based on the project document and timeline proposed in the discussion paper prepared by the United Kingdom, Chile, Ghana, India and Japan.

We will be happy to engage in this work and provide input and comments, more specifically in relation with Foods for Special Dietary Use, when the worked has started.

ISDI would like to note that agenda items 7 and 9 are interlinked.

ISDI Position: Discussion paper on allergen labelling

CCFL45: Agenda item 8

General comments:

ISDI supports the new work based on the project document and timeline proposed in the discussion paper prepared by Australia, the United Kingdom and the United States of America. We would like to raise a couple of specific comments in regard to the discussion paper and the project document below.

Specific comments:

Section 5. RECOMMENDATION TO CCFL

Proposed modified paragraph:

- 2) Develop guidance on the use of precautionary allergen or advisory labelling including:
- Principles for the use of precautionary allergen or advisory labelling **discussing quantitative risk assessment system**
 - Labelling provisions, including definition(s) for precautionary allergen or advisory labelling **as well as recommended wording**
 - The location and appropriate Codex text(s) for the guidance.

Rationale:

The survey organized by Codex showed the need for standardization of precautionary allergen labelling statement wording as well as the need for some risk-based guidance for when these statements can be displayed.

APPENDIX 1 Project Document

3. MAIN ASPECTS TO BE COVERED

Proposed modified paragraph:

- 3) Develop guidance on the use of precautionary allergen or advisory labelling including:
- Principles for the use of precautionary allergen or advisory labelling **discussing quantitative risk assessment system**
 - Labelling provisions, including definition(s) for precautionary allergen or advisory labelling **as well as**

recommended wording

c) The location and appropriate Codex text(s) for the guidance.

Rationale:

The survey organized by Codex showed the need for standardization of precautionary allergen labelling statement wording as well as the need for some risk-based guidance for when these statements can be displayed.

ISDI Position: Discussion paper on innovation - use of technology in food labelling

CCFL45: Agenda item 9

General comments:

ISDI supports the continuation of the discussion at CCFL and possible new work as proposed in the discussion paper developed by Canada.

ISDI notes that section 4 of the discussion paper raises a possibility for a revision of Codex definition of 'label' and 'labelling'. We would like to raise that there is a synergy with an on-going discussion at CCFNSDU on the draft revised Standard for Follow-up formula (CXS 156-1987). ISDI believes there is a need to further define and discuss these terms at CCFL.

ISDI would like to note that agenda items 7 and 9 are interlinked as mentioned in the discussion paper itself.

ISDI Position: Discussion paper on criteria for the definition of 'high in' nutritional descriptors for fats, sugar and sodium

CCFL45: Agenda item 11

General comments:

ISDI does not support the new work on "high in" nutritional descriptors for individual nutrients such as fats, sugars and sodium. We believe that there is no role in Codex guidelines for such statements/claims, as they arouse fear with the consumer (going against 3.4 of Codex Guidelines on Claims).

If the new work were to be approved by CCFL, ISDI would request the Foods for Special Dietary Uses (FSDU) to be clearly excluded from the scope of the work.