

European Union Position

CODEX COMMITTEE ON FOOD LABELLING

Thirty-eighth Session

Quebec City, Canada, May 3 – 7, 2010

Proposed Draft Criteria and Principles for Legibility of Nutrition Labelling

(Item 4 c, CX/FL 10/38/8)

*European Union Competence
European Union Vote*

The European Union (EU) would like to thank the United States for leading the electronic working group and for preparing the proposed draft criteria and principles for legibility of nutrition labelling. The EU has the following comments on the proposed text in Annex I of CX/FL 10/38/8.

Section - General Principles

Point (1) - The EU agrees with the proposal that there should be a cross reference to the sections in the General Standards for the Labelling of Prepackaged Foods that provide general principles for legibility. The EU notes the inclusion of the sentence in square brackets to paragraph 1, however the EU is not convinced that this is necessary as the general principles in section 8.1.1 to 8.1.3 would equally apply to supplementary labels.

Section - Specific features of presentation

Point (2) – The EU supports the inclusion of the wording in square brackets, namely "additional or alternative".

Point (5) – The EU can agree that a minimum font size should be considered. However, the EU does not support the inclusion of sentence in square brackets that gives specific details about the font characteristics.

Section - Exemptions and Special Provisions

Points (8) and (9) – As noted in the discussion part of the paper these provisions presuppose that a nutrition declaration is mandatory. The necessity of this provision will depend on whether the Committee considers that the provision of nutrition information should be a general recommendation. Also as noted in the discussion paper, there is a question whether these provisions are relevant to the section dealing with legibility. Therefore, the EU believes that these points should be deleted in this text. But they should be considered if the Committee concludes that the guidelines should recommend mandatory nutrition labelling.