

17 June 2011

EUROPEAN UNION COMMENTS ON
CODEX CIRCULAR LETTER CL 2011/13-FL:

REQUEST FOR COMMENTS CONCERNING

**THE DISTRIBUTION OF THE REPORT OF THE 39TH SESSION OF THE CODEX
COMMITTEE ON FOOD LABELLING (REP11/FL)**

The European Union and its 27 Member States are pleased to submit the following comments to circular letter 2011/13-FL.

**2) CCFL – PROPOSED DRAFT COMPILATION OF CODEX TEXTS RELEVANT
TO LABELLING OF FOODS DERIVED FROM MODERN BIOTECHNOLOGY -
REP11/FL, PARA. 156, APPENDIX III**

EU position:

The EU strongly supports the final adoption of the proposed draft compilation of Codex texts relevant to labelling of foods derived from modern biotechnology.

The EU suggests to clarify footnote 1: "See the Principles for the Risk Analysis of Foods derived from Modern Biotechnology (CAC/GL 44-2003)" as follows " **For the definition of modern biotechnology**, see the Principles for the Risk Analysis of Foods Derived from Modern Biotechnology (CAC/GL 44-2003)"

Rationale:

The EU proposes to clarify the wording of footnote 1 as a simple reference to the document without pointing to the definition of "Modern Biotechnology" is helpless for the reader, especially taking into account that this document is already referred to in the text itself.