

# codex alimentarius commission



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**Agenda Item 3**

**CX/FL 11/39/3**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

**Consideration of labelling provisions in draft Codex standards**

**B. FAO/WHO Coordinating Committee for Asia**

**PROPOSED DRAFT REGIONAL STANDARD FOR CHILI SAUCE (At  
Steps 5/8) (REP11/ASIA Appendix III)**

**Section 8: Labelling**

**Sub-section: 8.1.2:**

India feels that product standard should not involve declaring the level of pungency. Therefore, the text may be deleted.

**Rationale:** At present, there is no practice of mentioning the level of chili pungency (heat value) on the label. Pungency level is one of the sensory parameters like salt level, acidity level, sweetness level etc. There are also technical difficulties in evaluating pungency level, and its scientific testing and market perception.

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**Agenda Item 4(a)**

**CX/CL 11/39/4**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

#### **Implementation of the WHO Global Strategy on Diet, Physical Activity and Health**

**Draft Revision of the Guidelines on Nutrition Labelling (CAC/GL2-1985) concerning the list of nutrients that are always declared on a voluntary or mandatory basis (at step 7) (CL 2010/40-FL) Comments at Step 6**

#### **Annex**

**Draft Revision of the Guidelines on Nutrition Labelling (section 3.2 listing of nutrients) (at step 6 of the procedure)**

#### **Trans fatty acids**

India supports the inclusion of footnote to para 3.2.1.4 of the Guidelines that “Countries where the level of intake of trans-fatty acids is a public health concern should consider the declaration of trans-fatty acids in nutrition labelling.”

#### **Sodium / Salt**

India reiterates its stand to include sodium in the list of nutrients that are always declared under 3.2.1 of the proposed guidelines.

The 'Salt' wherever added in foods is required to be labeled as part of the ingredient list (as per Codex GSLPF).

The expression 'Salt' may be misleading in the cases where food has inherent sodium but the salt has not been added. Furthermore the inherent sodium in food is not always in the form of sodium chloride. However the nutrient "sodium" cannot be expressed in any other form but "sodium" and hence will be very specific.

Salt has been identified as one of the acceptable vehicle for micronutrients fortification (e.g. Double Fortified Iron Iodine Salt).

### **Total Sugar**

India has been supporting inclusion of "total sugars" in the list of nutrients that are always declared under 3.2.1 of the proposed guidelines, because it is difficult to differentiate between intrinsic and extrinsic sugars analytically which could create difficulties in enforcement.

Keeping in consideration WHO's strategy's to promote / encourage usage of protective foods e.g. milk, fruits, vegetables etc (which inherently contain natural sugars); India proposes discussion on strategies to minimize the potential negative impact on consumption of such protective foods.

Further looking at the global debate on the right definition on sugars that is whether it should be "Added", "Total", "Free" etc; we would request codex to further debate on this topic.

Many countries like India have the dual burden of "Malnutrition" (requiring energy dense foods) as well as seeing an increasing number of non communicable diseases like "Diabetes" (requiring control on sugar /available carbohydrates).

Another observation has been probable and not convincing data or low relevance of sugar intake to NCD's.

Additionally WHO it has been reported that strength of evidence between free sugars and obesity, type 2 diabetes, CVD is not convincing. In fact it is the high intake of energy dense foods which has convincing evidence in increasing obesity. (References: Diet, Nutrition and Prevention of chronic diseases WHO technical series 916, pg 147) This is being tackled by total calorie/energy labelling.

Besides for a country like India the sugar consumption is far lesser than the recommendation. Like children of age group 10-12years consume 14 g/day as compared to a recommendation of 35 g/day (Reference: Nutrient reference intake, NIN). This is in contrast to a typical US child of the similar age group who consumes about 125-180g/day (Reference: CFSI II data (1992-94), US Institute of Medicine).

Adoption of total sugars without delinking products like milk and fruit may lead to an unbalanced nutritional recommendation and discourage the use of such foods in populations specially children. Milk and Fruit consumption are considered to be important for all age groups and even form a part of the DPAH guidelines of WHO. This labelling could lead to negative connotations for foods like Milk and Fruits reducing their consumption in healthy diets.

Hence we would like a further debate on this topic.

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**Agenda Item 4(b)**

**CX/FL 11/39/6**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

**Implementation of the WHO Global Strategy on Diet, Physical Activity and Health**

**Discussion paper on additional conditions for nutrient content claims and comparative claims in the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997)**

**(Report of the EWG prepared by Canada)**

The EWG report seeks replies to 14 questions. India's replies to these questions are provided below:

**Question 1: Does the physical working group agree to suggest that the definitions of sugars be added to section 2 of the guidelines**

**Reply:** The definition is already existing in CAC GL 2-1985 and hence not required to be re-introduced here.

If it can include the scope of 'sugar' also in the same document, it would help to account for the difference between sugar and sugars. e.g. Sugar in India means 'Sucrose' while Sugars in Codex means 'all mono and disaccharides'. Hence inclusion of term sugar will help in CAC GL 2 - 1985.

Claims can be made around “No added sugar” and “No added sugars”.

**Question 2: Does the physical working group agree that the title of the table should be amended from the *Table of conditions for nutrient contents* to read *Table of conditions for nutrient content claims*?**

**Reply:** India agrees to the amendment in the title of the Table as, ‘Table of conditions for nutrient content claims’.

**Question 3: For each of conditions (a) through (d), do the pWG members agree to the language proposed?**

**Reply:** India suggests the following amendments in the language proposed:-

<u>Proposed statement by EWG</u>	<u>Revised statement by India</u>	<u>Rationale</u>
<p>7.1.1 Claims about the non-addition of sugars (e.g. “no added sugar(s)”, without added sugar(s)”) may be used provided that:</p> <p>(a) no amount of sugars is added during processing;</p> <p>(b) no amount of any other ingredients that contain sugars is added during processing;</p> <p>(c) the sugars content of the food has not been increased above the amount present in the ingredients by some means such as the use of enzymes;</p> <p>(d) the food that it resembles and for which it substitutes normally contains added sugars; and</p> <p>(e) the food label bears a disclaimer statement</p> <p>• options to be considered :</p> <p>o “not a low Calorie or reduced calorie food” (unless it meets the conditions for those claims);</p>	<p>Claims about the non-addition of sugars (e.g. “no added sugar(s)”, without added sugar(s)”) may be used provided that:</p> <p>(a) no amount of <del>sugars</del> <b>sugar(s)</b> is added during processing;</p> <p><b>(b)</b> the food that it resembles and for which it substitutes normally contains added <del>sugars</del> <b>sugar(s)</b>; and</p> <p><b>(c)</b> the food label bears a disclaimer statement</p> <p><b><u>(d) in case of “no added sugars” claim,</u></b> no amount of any other ingredients that contain sugars is added during processing;</p> <p><b><u>(e) in case of “no added sugars” claim,</u></b> the sugars content of the food has not been increased above the amount present in the ingredients by some means such as the use of enzymes;</p>	<p>Scope of both Sugar and Sugars has been introduced.</p> <p>If we adopt Labelling option 2, it may not be necessary that conditions b. and c. are met.</p> <p>Conditions b. and c. are when sugar appears naturally in products like if they are milk, fruit based products and in processing conditions like malting or</p>

<p>o “contains naturally occurring sugars” (if the food is not sugar-free or if sugars are naturally present)</p> <p>o direction to consult the nutrition information provided on the label.</p>	<p>• options to be considered :</p> <p>o “not a low Calorie or reduced calorie food” (unless it meets the conditions for those claims);</p> <p>o “contains naturally occurring sugars <b>sugar(s)</b>” (if the food is not sugar-free or if sugars are naturally present)</p> <p>o direction to consult the nutrition information provided on the label.</p>	<p>mashing where it is introduced in products in situ on use of enzymes. But such products may not have any added sugar and hence may make the claim “no added sugar (s)’.</p>
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Further the terms ‘low sugar’ may be introduced which means:

Low Sugar: A claim that a food is low in sugars, and any claim likely to have the same meaning for the consumer, may only be made where the product contains no more than 5 g of sugars per 100g for solids or 2,5 g of sugars per 100 ml for liquids . Reference (EU)

**Question 4: In relation to condition (e):**

**(i) Do pWG members agree that it is appropriate to add an additional labelling criterion to further assist consumers in understanding the composition of the food?**

**Reply:** Yes

**(ii) Is there supporting evidence that this type of criteria enhances consumer understanding of the composition of the food?**

**Reply:** May

**(iii) Which of the options are preferred by pWG members?**

**Reply:** Option 2

**(iv) Should conditions be added to specify the placement of such information in relation to the use of the claim – e.g. adjacent to the most prominent claim on the principal display surface?**

**Reply:** Yes

**Question 5: For each of conditions (a) through (d), do the pWG members agree to the language proposed.**

**Reply:** India suggests the following amendment in the language proposed:-

Proposed statement	Revised statement	Rationale
<p>7.2.1 Claims about the non addition of salt (sodium) may be used provided that:</p> <p>(a) no amount of salt or other sodium salts are added during processing;</p> <p>(b) no other ingredients that contain sodium and functionally substitute for added salt are added during processing;</p> <p>(c) the sodium content has not been increased above the amount present in the ingredients by some means such as use of enzymes or hydrolysis;</p> <p>(d) the food that it resembles and for which it substitutes normally contains added salt;</p> <p>(e) the food label bears a disclaimer statement: options to be considered:</p>	<p>7.2.1 Claims about the non addition of <del>salt</del> (sodium) may be used provided that:</p> <p>(a) no amount of salt or other sodium salts are added during processing;</p> <p>(b) no other ingredients that contain sodium and functionally substitute for added salt are added during processing;</p> <p>(c) the sodium content has not been increased above the amount present in the ingredients by some means such as use of enzymes or hydrolysis;</p> <p>(d) the food that it resembles and for which it substitutes normally contains added <b>sodium</b> salt;</p> <p>(e) the food label bears a disclaimer statement: options to be considered:</p>	<p>If we adopt Labelling option 2, it may not be necessary that conditions b. and c. are met.</p> <p>Conditions b. and c. are when salt appears naturally in products or introduced through processing conditions.</p>

Proposed statement	Revised statement	Rationale
<ul style="list-style-type: none"> <li>• “not a sodium-free food” (unless it meets the conditions for sodium free)</li> <li>• “contains naturally occurring sodium” (if the food is not sodium free or contains naturally occurring sodium)</li> <li>• There is a direction to consult the nutrition information provided on the label</li> </ul>	<ul style="list-style-type: none"> <li>• “not a sodium-free food” (unless it meets the conditions for sodium free)</li> <li>• “contains naturally occurring sodium” (if the food is not sodium free or contains naturally occurring sodium)</li> <li>• There is a direction to consult the nutrition information provided on the label</li> </ul>	

**Question 6: In relation to condition (e):**

**(i) Do pWG members agree that it is appropriate to suggest adding an additional labelling criterion to further assist consumers in understanding the composition of the food?**

**Reply:** Yes

**(ii) Is there supporting evidence that this type of criterion enhances consumer understanding of the composition of the food?**

**Reply:** May

**(iii) Which of the options are preferred by pWG members?**

**Reply:** Option 2

**(iv) Should conditions be added to specify the placement of such information in relation to the use of the claim – e.g. adjacent to the most prominent claim on the principal display surface?**

**Reply:** Yes

**Question 7: Do pWG members agree to propose that the claim “salt-free” should be equivalent to the claim “sodium-free” and therefore have to meet the conditions set out for sodium-free?**

**Reply:** India would like to propose that only ‘sodium free’ claim should be made as only sodium is relevant to Non - Communicable Diseases (NCD’s) and not ‘salt’.

**Question 8: Is there support from the pWG members to propose amending the text in section 6 as suggested below.**

**Reply:** India supports the proposed amendments in the text in section 6.

**Question 9: Is there support to propose that the Committee consider also smaller minimum reductions such as 10% or 15% specifically in relation to gradual reduction programs as suggested in the text above?**

**Reply:** Indian supports the proposal as suggested in the text for the gradual reductions.

However it should not be bogged down by conditions that such claims may only be used for a year maximum following the placement of the reformulated product as it may not be possible to place further reformulated products in market in less than 1 year again in all cases.

**Rationale:** Claims on x% less could be beneficial if adopted, as they would assist and encourage food manufacturers to take up programs for gradual reduction of fat/ saturated fat/ sodium/ sugar (s).

**Question 10: Are there other conditions that should be explored prior to considering a proposal to the committee**

**Reply:** No

**Question 11: Do pWG members support proposing the changes to clarify the definition of the “reference food” in the text for comparative claims to the Committee?**

**Reply:** India supports the proposed changes to clarify the definition of the “reference food” in the text for comparative claims. However India proposes the following amendment to the text as suggested below:

Proposed statement	Revised statement	Rationale
<b>6.1.1 The reference food against which a food may be compared in making a nutrient content claim, should meet one of the following criteria:</b>	<b>6.1.1 The reference food against which a food may be compared in making a nutrient content/<u>comparative</u> claim, should meet one of the following criteria:</b>	

**Question 12: Do the pWG members feel that it would be beneficial for the Committee to consider adding specific conditions regarding trans-fatty acids to the existing claims for saturated fatty acids listed in the Guidelines – both for comparative claims and for “free” and “low” claims (beyond the current footnote in the Table to the Guidelines)? If so, are there suggestions for these conditions that could be considered by both CCFL and CCNFSDU?**

**Reply:** Yes.

Pl refer to reply of question 14

**Question 13 : Is there support for the pWG to bring forward a proposal for new work to add claims specific to trans-fatty acids to the Committee?**

**Reply:** Yes

Conditions for trans fatty acid claims should be based on only TFA levels in the product. Suggestions include some from EWG responses as below

Nutrient Content claims and criteria:

- Low trans fatty acids: 0.75 g per 100 ml (liquid) or 1.5 g per 100 g (solids)
- Trans fat free or zero trans fatty acids: 0.2g per serve

Comparative claims: Conditions same as others 25% reduction as compared to reference foods.

**Question 14: If there is support for a proposal for new work, is the proposed text sufficient for a starting point for discussion or are there other elements which also need to be considered or which should not be included?**

**Reply:**

Proposed statement			Revised statement			Rationale
Component	Claim	Conditions (not more than)	Component	Claim	Conditions (not more than)	Consistency
Saturated Fat	Low	<ul style="list-style-type: none"> <li>- 1.5 g saturated and trans-fatty acids per 100 g (solids)</li> <li>- 0.75 g saturated and trans-fatty acids per 100 ml (liquids)</li> <li>- and 10% of energy</li> </ul>	Saturated Fat	Low	<ul style="list-style-type: none"> <li>- 1.5 g saturated and trans-fatty acids per 100 g (solids)</li> <li>- 0.75 g saturated and trans-fatty acids per 100 ml (liquids)</li> <li>- and 10% of energy</li> <li>- <u>and meets the conditions for low in of trans-fatty acids listed in this table</u></li> </ul>	
	Free	<ul style="list-style-type: none"> <li>- 0.1 g per 100 g (solids)</li> <li>- 0.1 g per 100 ml (liquids)</li> <li>- <b>and meets the conditions for free of trans-fatty acids listed in this table</b></li> </ul>		Free	<ul style="list-style-type: none"> <li>- 0.1 g per 100 g (solids)</li> <li>- 0.1 g per 100 ml (liquids)</li> <li>- <b>and meets the conditions for free of trans-fatty acids listed in this table</b></li> </ul>	

Proposed statement			Revised statement			Rationale
Component	Claim	Conditions (not more than)	Component	Claim	Conditions (not more than)	
Trans Fat	Free	<ul style="list-style-type: none"> <li>- X g of trans fat per 100 g (solids)</li> <li>- Y g of trans fat per 100 ml (liquids)</li> <li>- and meets the conditions for low in saturated fatty acids listed in this table.</li> </ul>	Trans Fat	Free	<ul style="list-style-type: none"> <li><del>- X g of trans fat per 100 g (solids)</del></li> <li><u>- and meets the conditions for free of trans-fatty acids of 0.2 g of trans fat per _____ serve (solids/liquids)</u></li> <li><del>- Y g of trans fat per 100 ml (liquids)</del></li> <li>- and meets the conditions for low in saturated fatty acids listed in this table.</li> </ul>	
				Low	<u>0.75 g per 100g (solids) or 1.5 g per ml (liquids)</u> <u>And meets the condition of low in saturated fatty acids</u>	
			<u>Additionally Comparative claims for TFA:</u>			
			<u>Lower in or Reduced Trans fatty acid: Conditions same as others 25% reduction as compared to reference foods</u>			

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**Agenda Item 4(d)**

**ALINORM 10/33/22  
Paragraph 67**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

**Implementation of the WHO Global Strategy on Diet, Physical Activity and Health**

#### **Issues related to Mandatory Nutrition Labelling**

India supports the Mandatory Nutrition Labelling and proposes to introduce Appendix III of ALINORM 10/33/22 as an Annexure to the Nutritional Labeling document CAC GL -2/1895.

This is an important document which may serve as a tool to guide competent authorities when considering the implementation of mandatory labelling and voluntary nutritional labelling.

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**Agenda Item 5(a)**

**CX/FL 11/39/7**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

#### **Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods:**

**Annex 1- Inclusion of Ethylene for Other Products at step 7  
(ALINORM 10/33/22, Appendix VII) (Comments at Step 6)**

#### **Justification for use of ethylene for ripening of fruits**

(Prepared by EWG led by Ghana)

India supports the inclusion of the following statements in Section C of Appendix VII as suggested by the EWG

“Ethylene may be used for ripening of kiwifruit, bananas **and other climacteric fruits**”

The general recommendations made by the EWG on the justification for the use of ethylene in climacteric fruits are acceptable to India.

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**Agenda Item 5(c)**

**CX/FL 11/39/10**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

**Proposed draft Revision of the Guidelines for the Production,  
Processing, Labelling and Marketing of Organically Produced Foods  
(GL 32-1999)**

**(To include aquaculture animals and seaweed)  
Comments at Step 3**

#### **Specific Comments:**

#### **(B) Changes in Annex I**

#### **Add a Section B.1: Aquatic animal**

#### **Health Care**

**Para 16:** It is proposed to include new bullets as follows:

- **Chemically synthesized allopathic veterinary drugs may be allowed under strict monitoring conditions and the withdrawal period should be defined.**
- **Yeast based organic preparation and probiotics of certified origin are permitted.**

**Rationale:** To maintain the integrity of aquaculture organic food, chemically synthesized allopathic veterinary drugs may be used in a restricted manner and under supervision of the certification body.

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**Agenda 6 (a)**

**CX / FL 11/39/11**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty-ninth Session  
Quebec City, Quebec, Canada, 9-13 May, 2011**

### **INDIA'S VIEWPOINT**

#### **Labelling of Food and Food Ingredients Obtained Through Certain Techniques of Genetic Modification/Genetic Engineering:**

#### **Draft Amendment to the General Standards for the Labelling of Prepackaged Foods-Definitions (ALINORM 10/33/22 Appendix IX) Comments at step 6**

### **SECTION 2. DEFINITION OF TERMS<sup>1</sup>**

It is proposed to replace the word “*changed*” with “*modified*” in the definition “genetically modified/Engineered organisms” as follows:

“**Genetically modified /engineered organism** means an organism in which the genetic material has been ~~changed~~ ***modified*** through modern biotechnology.”

**Rationale:** *GE technique modifies the genetic material for desired characteristics.*

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**Agenda Item 6(b)**

**CX/FL 11/39/12**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

#### **Proposed Draft Recommendations for the Labelling of Foods and Food Ingredients Obtained Through Certain Techniques of Genetic Modification / Genetic Engineering (at Step 4) (ALINORM 10/33/22, Appendix X) Comments at Step 3**

India supports for continuation of work on this agenda item till a consensus is arrived on an international GM food labeling standard.

- **On Chapeau discussion**

There is no significant difference between chapeau version 1 and 2. However, we recognize that chapeau version 1 is more appropriate with the following amendments:

**“Chapeau version 1:** The purpose of this document is only to recall and assemble in a single document some important elements of guidance from Codex texts, which are relevant for the labelling of foods derived from modern biotechnology. **Labelling of a food is considered only after the food has undergone appropriate safety assessments to deem it safe for human consumption.** It also recognizes that each country can adopt different approaches regarding labelling of foods derived from modern biotechnology. *This document is not intended to suggest or imply that foods derived from modern biotechnology are necessarily different from other foods simply due to their method of production.*”

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**Agenda Item 7**

**CX/CL 11/39/14- Rev 1**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

#### **Proposed Draft Definition of Nutrient Reference Values Proposal and replies to CL 2010/21-FL**

#### **Comments at Step 3**

India proposes to include both - the current practice of using dietary intake data to determine NRVs which are well established and also used by CCFNSDU also for revision of NRV's for Nutritional labelling and - the approaches suggested by CCFNSDU in deriving the new definition of NRVs to include the scope of NRV for NCD's where scientific data on nutrients will be more available for use.

We also suggest slight additions in the definition, taking cognizance of the discussions in CCFNSDU on General principles for establishing NRV's for NCD's, that this data used for determining NRV's for NCD's should be relevant, convincing and recent scientific data.

We also propose addition of the word "and making claims" as NRV's are linked to nutrient content claim criteria's in CAC GL -23/1997.

Hence a single, inclusive definition of NRV proposed is:

**'Nutrient reference values (NRVs) are a set of numeric values established by Codex and used for the purpose of nutritional labelling**

**and making claims. They include two types of values, those based on daily intake reference values associated with nutrient requirements' (NRVs) and other based on relevant, convincing, recent scientific data on nutrient requirements and/or levels of nutrients associated with reduction of risk of diet-related NCDs'.**

As suggested by the US, this definition could further be linked to the Annexes which will be the “General Principles for the establishment of these NRV’s” - an ongoing work in CCNFSDU. So the next line after this definition of NRV could be:

“General Principles for establishing these NRV’s are given in Annex....”

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**Agenda Item 9**

**CX/FL 11/39/16**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

**INDIA'S VIEWPOINT**

**Modified Standardized Common Names**

**Discussion Paper on the Scope and Impact of Amendments to the  
Codex General Standard for the Labelling of Prepackaged Foods for  
Modified Standardized Names for Foods with Modifications from a  
Compositional Standard for the Purpose of Nutrition Claims**

We support this work and agenda

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**Agenda Item 10**

**CX/FL 11/39/17**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING**

**Thirty –Ninth Session  
Québec City, Québec, Canada, 9-13 May 2011**

### **INDIA'S VIEWPOINT**

#### **Revised Discussion paper on Exchange of Information between Competent Authorities when Suspecting Fraud concerning Organic Products**

##### **General comments:**

India supports the proposal for the “exchange of information between competent authorities when suspecting fraud concerning organic products”. We would like to propose the additional wording to the section 6.10 as follows:

**“Before notifying to the exporting country, the importing country should complete the investigation for establishing the evidence. The notification of the importing country should be supported with the following documents**

- **Product traceability during sampling right from the imported container at the port to the testing laboratory .**
- **The lab report should be detailed with lot number and mentioned MRL approved by importing country authority rather than a prescribed MRLs of private initiatives**

***Rationale:*** *The mutual exchange of detailed information between the competent authority of exporting and importing country will facilitate in reaching a legal conclusion of the investigation.*