

STATEMENT OF COMMON CONCERNS OF PUBLIC HEALTH AND CONSUMER GROUPS

regarding the Codex Alimentarius Committee on Food Labelling's
Proposed Draft Guidelines on Front-of-Pack Nutrition Labelling
Ottawa, Ontario, Canada 13-17 May 2019 (CCFL45)

Unhealthy diets - high in sodium, saturated and trans fats, added sugars and processed and red meat, and low in whole grains, fruits, vegetables, nuts and seeds, polyunsaturated fat, and other unprocessed or minimally processed foods - are a leading cause of death and disability globally. Nutrition-related illness was estimated to cause 11 million deaths in 2017, according to the Institute for Health Metrics and Evaluation's Global Burden of Disease.ⁱ

The World Health Organization (WHO) recommends countries adopt front-of-pack nutrition labelling (FOPNL) as part of a suite of interventions to promote healthier diets, and to contribute to reducing the burden of obesity and nutrition-related disease. More than 30 FOPNL systems have already been adopted globally using a variety of approaches. They include the voluntary Health Star Rating in Australasia, the United Kingdom's traffic lights, the Nordic Keyhole and France's Nutri-Score. There is also increasing use of mandatory nutrient-specific warnings in Chile, Peru, Israel, and also under consideration in Uruguay and Canada. The objectives of FOPNL are to inform and/or guide consumers towards healthier food choices and away from unhealthy options by providing simplified information about the amounts and types of nutrients and/or ingredients in foods. They may also incentivise healthier reformulation by industry.

What happens in Ottawa: From 13-17 May 2019, the Codex Committee on Food Labelling (CCFL)ⁱⁱ will begin formal negotiations on guiding principles for the development of FOPNL. Approximately 250 representatives from 60 national governments, dozens of food industry associations, and a handful of officially recognized health and consumer groups are expected to convene to significantly advance a process that began in May 2016.

Why these negotiations matter: Evidence-based, flexible Codex standards can support national governments to design strong FOPNL that are protective of health. Restrictive standards that protect industry interests can inhibit a country's ability to do so.

The undersigned groups urge the CCFL to ensure Codex guidance empowers governments to:

1. **Mandate FOPNL**, similar to Codex guidance on Back-of-Pack Nutrition Labelling made in 2012;
2. **Prevent undue industry influence** by recognising the importance of government leadership in FOPNL development, and the need for conflict of interest safeguards to facilitate input from key actors while ensuring health objectives are always prioritised over private interests;
3. **Exercise flexibility** by providing space for regulatory innovation informed by national contexts and disease burdens, recognizing that no current system is perfect and that experience and emerging independent scientific evidence will inform further improvements;
4. **Build upon the mandate provided by WHO** by acknowledging the centrality of FOPNL in recommendations for preventing diet-related non-communicable diseases;
5. **Consider** ingredients and nutrients of public health concern in FOPNL development;
6. **Avoid the "halo effect" on risky products** by allowing room to determine the scope of FOPNL depending on the type of label adopted, for example by prohibiting positive endorsements on breast-milk substitutes or alcohol, and/or ensuring nutrient-specific warnings are applied to 'sports' beverages as well as foods for infants and young children; and
7. **Specify format** to promote prominence and consumer use, for example by ensuring FOPNL appears on the principal panel and is visible to consumers without needing to pick up the package, and by requiring minimum font/image size and colour.

This statement is supported by the following groups. (Groups participating in the committee deliberations in-person are indicated with an asterisk).

- Consumers International*
- Global Health Advocacy Incubator
- International Baby Food Action Network (IBFAN)*
- World Federation of Public Health Associations (WFPHA)*
- World Obesity Federation
- World Public Health Nutrition Association (WPHNA)
- Aliança Pela Alimentação Adequada e Saudável (Alliance for Healthy and Adequate Diets), Brazil*
- Alianza por la Salud Alimentaria (Nutritional Health Alliance), Mexico
- Centre for Health Science and Law, Canada*
- El Poder del Consumidor (Consumer Power), Mexico*
- Instituto Brasileiro de Defesa do Consumidor (Brazilian Institute of Consumers Protection), Brazil*



ⁱ Afshin, A., Sur, P.J., Fay, K.A., et al Health effects of dietary risks in 195 countries, 1990–2017: A systematic analysis for the global burden of disease study 2017. *The Lancet* 2019.

ⁱⁱ CCFL is a committee of the Codex Alimentarius Commission which is a joint-commission of the United Nations World Health Organization and Food and Agriculture Organization that sets standards for trade in food that are considered authoritative by the World Trade Organization for resolving trade disputes. Codex standards function as permeable ceiling standards, not minimum standards; countries are not obliged to implement them, but may be asked to provide scientific justification if their consumer or health protection measures exceed Codex guidance. The Government of Canada has hosted and chaired the CCFL since the early 1960s.