

**Nutrition, Alcohol, and Environmental Impact Labels Should Protect Public Interests,
Not Sell Foods that are Harmful to Humans and the Planet,**

International Public Interest Tell UN Standard Setting Body at

[Virtual Codex meeting September 21-October 7, 2021](#)

hosted virtually by the Government of Canada

OTTAWA & REMOTE CITIES (September 2021)—Since 2016, a United Nations Body mandated to set standards for trade in food has been negotiating a set of guidelines for countries seeking to better help consumers choose nutritious foods and avoid junk food with so-called “front-of-pack nutrition labelling (FOPNL)” and is considering more protective labels to announce risks for alcohol and environmental impact. Standards set by the Codex Committee on Food Labelling are not mandatory for national governments, but are presumptive ceiling standards for consumer protection that countries cannot exceed without providing additional scientific justification that might not be considered sufficient if a trading partner challenged those rules.

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 were estimated to cause 8 million deaths and waste 188 million disabilities adjusted life years (DALYs) worldwide in 2019, according to the Institute for Health Metrics and Evaluation’s Global Burden of Disease.¹ The World Health Organization estimates that excess alcohol causes 3 million deaths per year.² And the United Nations Intergovernmental Panel on Climate Change (IPCC) estimates that 21–37% of total greenhouse gas (GHG) emissions are attributable to the food system and that climate change will have important negative impacts on food security.³

Governments around the world have been experimenting with various approaches to FOPNL Nutrition Labelling. They include Chile’s “stop sign” warning labels that have now been adapted for use in countries including Peru, Uruguay, Israel and Mexico, and United Kingdom Traffic Light Labels that use familiar symbols and colours to alert consumers to high levels of nutrients like sodium and sugars, the consumption which have been linked to heart disease, stroke, cancer and diabetes in many countries. Other countries use approaches based on the overall healthfulness of foods by using an algorithm to assess negative and positive contributions of ingredients and nutrients. They include [Australia’s Health Star Rating](#) (ranging from ½ to 5 stars) or [France’s 5-letter Nutri-score system](#) (ranging from E to A, like school grades in many places) which started in France and has now been adopted on a voluntary basis by seven other European countries.

While evidence is rapidly emerging to support these schemes, there is not yet consensus that one label ‘works best’ for all desired outcomes, or in all populations. There is no single approach that is suited for everywhere worldwide and some places, such as some low-income African countries—that suffer from very low fat and protein intake (in addition to low fruit and vegetables) have not yet implemented FOPNL. Evidence from Latin America and Europe, indicate the warning labels and some rating systems work in those places respectively. Before the talks began in 2016, the United States, the European Union and Canada had used diplomatic channels to exert pressure on early adopters of such FOPNL, including Chile, Peru, Indonesia, and Thailand to either justify or drop their novel public health interventions. In Europe, the Government of Italy challenged even the United Kingdom’s support for voluntary traffic light labelling under EU trade law.

Dozens of countries worldwide either prohibit the sale of alcohol completely, or require bottles of alcoholic beverages to display information about the amount of alcohol by volume and health risks of consuming alcohol (a product the WHO estimates causes more than 3 million deaths per year).

Further to a joint-statement that many of us made at the [most recent 2019 pre-COVID 19 negotiating session](#), we the undersigned public interest groups continue to urge the Codex Committee on Food Labelling (CCFL) and its member states to implement the following reforms:

1. **Mandatory Labelling:** Acknowledge the value and importance of mandatory FOPNL, eco-labelling, and alcohol warning labels to providing consumers accurate information. Evidence from voluntary labelling shows that the commercial incentive for manufacturers to omit labelling on nutrient-poor food is too great and likely to contribute to labelling that is systematically misleading.
2. **Conflict of Interest Safeguards Against Undue Industry Influence:** Expressly acknowledge the importance of conflict-of-interest safeguards in the policy-development process for all forms of labelling. Companies that sell food or alcohol and the organizations and researchers they fund should not be included in national advisory committees mandated to develop or advise on health and environmental protection labelling.
3. **Innovation Requires Flexibility:** Many countries are developing innovative and evidence-based approaches to front-of-pack labelling. Codex guidance should protect public health innovation, not obstruct it.
4. **Preventing the halo effect:** Ensure that governments have clear authority to prevent 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 directly or by implication.
5. **Environmental Impact Labelling:** The Codex Committee on Food Labelling should conduct a similar review and negotiation of guidance for mandatory environmental impact and alcohol labelling as it has for nutrition labelling. Strong eco-labelling rules could help consumers choose foods with lower greenhouse gas emissions, less pesticides, less use of water in production, etc. According to the UN Intergovernmental Panel on Climate Change, [food systems contribute between 22% and 37% of greenhouse gas emissions](#), rivalling the 35% attributed to the [energy sector](#). Some [countries are already piloting eco-labelling](#), but global guidance is needed to ensure that trade laws are not used by some exporting countries or companies to prevent legitimate innovations to help fight climate change and other environmental degradation.
6. **Alcohol Labelling:** Alcohol is a product that is a psychoactive substance with dependence-producing properties associated with a risk of developing more than 200 different types of diseases including cancer and cardiovascular diseases, mental and behavioural disorders, as well as injuries resulting from social and domestic violence. The health literacy regarding the risks associated with alcohol consumption of people living in Europe, including those who are not drinkers such as children, should be improved as a matter of urgency: According to data pertaining to alcoholic beverages on the EC’s Knowledge Gateway Webpage, cancer is the leading cause of alcohol-attributable deaths with a share of 29%, followed by liver cirrhosis (20%), cardiovascular diseases (19%) and injuries (18%). In other regions, alcohol consumption contributes to increase risk of tuberculosis. A recent study published in the Lancet in July 2021 shows that alcohol use is associated with a vast range of injuries and diseases, including cancer, and is a leading risk factor for the global burden of disease. The consumption of alcoholic beverages is causally linked to cancers of the upper aerodigestive tract (oral cavity, pharynx, larynx, and oesophagus) and cancers of the colon, rectum, liver, and female breast. Together, these cancers contributed 6.3 million cases and 3.3 million deaths globally in 2020.⁴ Young people are disproportionately affected by alcohol related harm. While 5.5% of all deaths in a population are attributable to alcohol, for the age group 15 – 19, this percentage increases to 19%, and for the age group 20 – 24 it is even higher, reaching 23.3%. Fetal alcohol spectrum disorders (FASDs) are a group of conditions that can occur in a person exposed to alcohol during the fetal stage. These effects can include physical disability problems and behavioral and learning problems with a high variability in the level of disability incurred. There is no known safe amount of alcohol during pregnancy or when trying to get pregnant, as FASDs can develop at any stage of pregnancy, including very early stages. To prevent a child from having an FASD, a woman should not drink alcohol

while she is pregnant or might be pregnant. This is because a woman could get pregnant and not know for up to 4 to 6 weeks. Harmonised measures for alcoholic beverages would improve the health literacy of citizens and consumers. Health warnings on alcoholic drinks would increase awareness of the health risks associated with drinking, which is worryingly low. It would also help reducing alcohol related harm with benefits to public health. A warning not to drink when pregnant or trying to conceive would provide clarity to women around the dangers of alcohol in pregnancy, such as Foetal Alcohol Syndrome Disorders (FASD). Finally, this would reduce costs for public health services stemming from the epidemic in non-communicable diseases such as cancer, cardiovascular disease injuries and obesity caused by alcohol related harm.

Approximately 250 representatives from 60 national governments, dozens of food industry associations, and a handful of officially recognized health and consumer groups usually attend in-person negotiations. The Government of Canada has hosted and chaired CCFL since the 1960s.



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* Groups participating in the committee deliberations in-person are indicated with an asterisk.

Endnotes

¹ Institute for Health Metrics and Evaluation. Global Burden of Disease database. (Seattle: IHME, 2019). Permanent link: <http://ghdx.healthdata.org/gbd-results-tool?params=gbd-api-2019-permalink/4f13de4e6acc99ea414735d5c7d407b5>

² WHO Global status report on alcohol and health 2018. Available at: <https://apps.who.int/iris/rest/bitstreams/1151838/retrieve>

³ Intergovernmental Panel on Climate Change (IPCC). Special Report: Special Report On Climate Change and Land, CH05, Food Security,. Executive Summary. 2019. Available at: <https://www.ipcc.ch/srccl/chapter/chapter-5/>

⁴ Data from the GLOBOCAN 2020 database.