

Phillippa Hawthorne and Kati Laitinen, Coordinators  
Inter-session work on sustainability labelling  
c/o Codex Committee on Food Labelling, Ottawa, Canada  
For the Secretariat, Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme, Rome, Italy  
c/o Ministry for Primary Industries, Wellington, New Zealand

July 15, 2022

**By email to:** [Phillippa.Hawthorne@mpi.govt.nz](mailto:Phillippa.Hawthorne@mpi.govt.nz); [Kati.Laitinen@mpi.govt.nz](mailto:Kati.Laitinen@mpi.govt.nz); and  
[codexnz@mpi.govt.nz](mailto:codexnz@mpi.govt.nz)

***Re: CCFL-Session 47-CL 2022/12-FL - Request for information on sustainability labelling***

Dear Philippa Hawthorne and Kati Laitinen,

The International Association of Consumer Food Organizations (IACFO), a Codex observer advocating on behalf of consumers worldwide, commends the Codex Committee on Food Labelling (CCFL) for considering the issue of sustainability labelling on foods. IACFO does not maintain a sustainability food labelling system at this time, but we consider the interconnected issues of environmental, economic, and social sustainability to be of the utmost importance, especially environmental sustainability, considering the acute existential crisis of climate change. We write this letter to express our support for efforts to ensure that food labels do not mislead consumers about sustainability and to express our interest in participating in future discussions on this topic within CCFL.

The United Nations (UN) recognizes the importance of improving global food systems to safeguard human and ecosystem health. The Secretary-General's Chair Summary and Statement of Action on the UN Food Systems Summit (September 2021) emphasized the role of food systems in both causing and resolving critical environmental sustainability crises, such as climate change, biodiversity loss, and overutilization of freshwater, as well as the interconnectedness between these crises and economic and social inequity and injustice.<sup>1</sup> Slowing climate change and resolving other key sustainability issues requires a high degree of coordination among governments around the globe. Codex Standards can help national governments facilitate the international safeguards necessary to minimize the inherent harm caused by the domestic and global trade of foods and food systems generally.

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<sup>1</sup> United Nations. Secretary-General's Chair Summary and Statement of Action on the UN Food Systems Summit. 23 September 2021. Available: <https://www.un.org/en/food-systems-summit/news/making-food-systems-work-people-planet-and-prosperity>. Accessed 14 July 2022. "Three billion people — almost half of all humanity — could not afford a healthy diet. Malnutrition in all its forms — including obesity — was deeply entrenched, leading to a broad range of negative health, education, gender, and economic impacts. Drivers of food insecurity and malnutrition — including conflict, climate extremes, and economic volatility — are further exacerbated by poverty and high levels of inequality...At the same time, recent reports have found that food systems are contributing up to one-third of greenhouse gas emissions, up to 80 per cent of biodiversity loss and use up to 70 per cent of freshwater. However, sustainable food production systems should be recognized as an essential solution to these existing challenges. It is possible to feed a growing global population while protecting our planet."

IACFO hopes the present stocktake of sustainability labels provides a foundation from which New Zealand and the European Union (EU) can draft an informative and detailed discussion paper on sustainability labelling for consideration by CCFL. We have observed food manufacturers using labels to disclose the environmental impact of foods (e.g., carbon footprint labels)<sup>2</sup> without uniformity or transparency, running the risk of contributing to greenwashing, a practice that violates a fundamental tenet of effective labelling by being misleading.<sup>3,4,5</sup>

In considering responses from members and observers to this request for information and when drafting the discussion paper, we request that New Zealand and the EU consider how the committee can implement safeguards against conflicts of interest in national and international policy arenas to ensure that strategies are government-led and that sustainability labels include warnings and do not mislead consumers to the benefit of industry and the detriment of the environment.

Given the nascent nature of sustainability claims on foods labels, there is an opportunity for CCFL to develop international standards that truly promote sustainability in part by mandating transparency, uniformity, and accuracy in such labeling systems.

IACFO eagerly awaits the forthcoming discussion paper and looks forward to providing more detailed input as the inter-session work continues and at the CCFL47 session in Ottawa.

Sincerely,

The International Association of Consumer Food Organizations

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<sup>2</sup> Kateman B. “Carbon Labels Are Finally Coming to the Food and Beverage Industry.” Forbes Magazine. 20 July 2020. Available: <https://www.forbes.com/sites/briankateman/2020/07/20/carbon-labels-are-finally-coming-to-the-food-and-beverage-industry/?sh=d0e94a77c03f>. Accessed 14 July 2022.

<sup>3</sup> Southey F. “What Are the Challenges of Environmental Labelling in Food?” Foodnavigator.com. 24 June 2021. Available: <https://www.foodnavigator.com/Article/2021/06/17/Environmental-labelling-challenges-for-food>. Accessed 14 July 2022

<sup>4</sup> Brown KA, Harris F, Potter C, Knai C. The future of environmental sustainability labelling on food products. Lancet Planet Health. 2020 Apr;4(4):e137-e138. doi: 10.1016/S2542-5196(20)30074-7. PMID: 32353291. Available: <https://www.thelancet.com/action/showPdf?pii=S2542-5196%2820%2930074-7>.

<sup>5</sup> Klinkenberg A. “Carbon Labelling in Germany: Greenwashing in the Food Industry.” Fairplanet.com. 26 September 2021. Available: <https://www.fairplanet.org/editors-pick/carbon-labelling-in-germany-greenwashing-in-the-food-industry/>. Accessed 14 July 2022.