

For background information, please see [CL 2023/71/OCS - CAC](#)

Codex Members and Observers are invited to submit comments on the Guidelines on the use of technology to provide food information.

Comments should address **whether the Guidelines are ready for adoption or not**; and if not, provide the rationale and proposals to facilitate adoption. Comments should be provided in conformity with the *Procedure for the Elaboration of Codex Standards and Related Texts (Part 3 – Uniform Procedure for the Elaboration of Codex Standards and Related Texts*, Procedural Manual of the Codex Alimentarius Commission.

PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING
(FOR ADOPTION AT STEP 5)

1. PURPOSE

Provide guidance on the use of technology to provide information to consumers¹ about pre-packaged foods¹.

2. SCOPE

These guidelines apply to food information that is accessed by consumers using technology via a reference on a pre-packaged food's label¹ or labelling¹.

3. USE

These guidelines should be read in conjunction with Codex texts related to labelling of pre-packaged foods, including but not limited to *General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985)*.

4. DEFINITIONS

For the purpose of these guidelines:

“**Food information**” means the information that is the subject of a Codex text about a pre-packaged food.

“**Technology**” refers to any electronic or digital means, including but not limited to websites, online platforms and mobile applications.

5. CONSIDERATIONS FOR DECIDING IF MANDATORY FOOD LABELLING INFORMATION COULD INSTEAD BE PROVIDED TO CONSUMERS USING TECHNOLOGY

5.1 The food information should be readily accessible to consumers during normal and customary circumstances of purchase and use, which means:

- (a) there should be sufficient technological infrastructure to support providing food information using that technology within the geographic area or country where the food is sold, such as in regards to prevalence and reliability of service,
- (b) the general population, or a sub-set of the population for whom the food information is intended, should have widespread and adequate access to the technology in that geographic area or country, and have adopted its use, and
- (c) it is reasonable for the consumer to use the technology to access the food information during the normal and customary circumstances of purchase and use and that there is evidence of similar consumer understanding of the technology.

5.2 Name of the food and food information concerning health and safety should not be provided exclusively using technology.

¹ As defined in the *General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985)*

Commented [PC1]: EFA strongly encourages Codex to consider adapting the proposed draft guidelines in line with the comments below, before proceeding to adoption:

5. CONSIDERATIONS FOR DECIDING IF MANDATORY FOOD LABELLING INFORMATION COULD INSTEAD BE PROVIDED TO CONSUMERS USING TECHNOLOGY:

EFA insists that any use of technology should be complementary to the physical (on-pack) labelling. As proposed now, the section title can be dangerously misleading. We suggest moving back to the previous title (Step 3): 'Principles for the use of technology in food labelling'.

5.2. EFA suggests to move this provision at 5.1, setting the scene for section 5 already from the beginning, but also to go back to the more detailed definition of 'food information concerning health and safety' contained in the previous draft (Step 3), which specified that these refers to 'e.g. ingredients, allergens, expiration dates'.

6. USE OF TECHNOLOGY TO PROVIDE CONSUMERS ACCESS TO MANDATORY FOOD INFORMATION THAT IS NOT ACCESSIBLE ON THE LABEL:

EFA insists that, with regards to information concerning health and safety, such exemptions must not lead to the provision of information exclusively by digital means. Further clarification is still needed in this provision.

5.3 Food information that relates to an individual physical product (e.g. lot code, date marking) should not be provided only using technology if doing so would compromise the ability to relate the information to that individual product.

6. USE OF TECHNOLOGY TO PROVIDE CONSUMERS ACCESS TO MANDATORY FOOD INFORMATION THAT IS NOT ACCESSIBLE ON THE LABEL

In cases where food labelling information is not accessible to consumers, due to conditions of sale or to exemptions from having to be provided on the label or labelling, consideration should be given to the use of technology to provide consumers with access to that information.