

21 April 2016

**CODEX COMMITTEE ON FOOD LABELLING  
(Forty-third Session)**

**Ottawa, Ontario, Canada, 9 - 13 May 2016**

**European Union Comments on**

**Agenda item 3:**

**CONSIDERATION OF LABELLING PROVISIONS IN DRAFT CODEX  
STANDARDS (CCASIA, CCSCH, CCFFV, CCFA)  
(CX/FL 16/43/3)**

*European Union Competence.  
European Union Vote.*

The European Union (EU) would like to submit the following comments for this agenda item.

The EU supports the labelling provisions of the following Standards

- Regional Standard for Non-Fermented Soybean Products
- Proposed Draft Standard for Cumin
- Proposed Draft Standard for Aubergines

Concerning the 'Proposed Draft Standard for Dried Thyme', the EU would like to make the following suggestion:

For consistency reasons vis-à-vis the Codex General Standard for the Labelling of Prepackaged Foods, and more precisely the paragraph 4.1.2, which requires the name of the food to be supplemented by words or phrase on the true nature or physical condition of the food only when it is necessary to avoid misleading or confusing consumers, the EU proposes to redraft paragraph 8.2.1 as follows:

'The name of the product shall be "~~dried~~ thyme".'

It is obvious to consumers that thyme by the appearance and type of packaging (jars or bags) is dried, that the thyme in pots is fresh and the herbs sold in small packages in the freezer are frozen. It appears therefore unnecessary to have to indicate "dried" in the name of this food.

Concerning the 'Proposed draft revision of the General Standard for the Labelling of food additives when sold as such', the EU would like to make the following suggestion:

For consistency reasons vis-à-vis the Codex General Standard for the Labelling of Prepackaged Foods, the EU proposes to replace the text in paragraph 4.1:

'(d) Food additives with a shelf-life not exceeding 18 months shall carry the date of minimum durability using words such as “will keep at least until ...”.'

by the following text:

'(d) Food additives with a shelf-life not exceeding 18 months shall carry the date of minimum durability using words “best before” or “best before end” following the requirements of paragraphs 4.7.1 (iii) and (iv) of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985).'

Similarly, the text of paragraph 5.1, identical to the text of paragraph 4.1, should be replaced by the text proposed above for paragraph 4.1.