

DRAFT AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985)- PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS

(For comments through CL 2024/56-FL)

(Proposed amendments to GSLPF are presented as underlined and red)

2. DEFINITION OF TERMS

"Container" means any packaging of food for delivery as a single item, whether by completely or partially enclosing the food and includes wrappers. A container may enclose several units or types of packages when such is offered to the consumer, such as multipack formats or joint presentations.

The information that we have deleted is not necessary and makes the sentence more difficult to understand.

"Prepackaged" means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes including joint presentation and multipack formats.

"Multipack format" means that presentation that is made up of a secondary outer container and two or more units of the same or different prepackaged food, which are intended to be consumed separately.

The information that we have deleted is not necessary and makes the sentence more difficult to understand.

Note: For example, small packages of French fries-muesli bars of different flavors in a larger package.

We do not believe French fries is the best example – in many countries French fries are hot chips. We suggest muesli bars or chocolate bars as an example.

"Joint presentation" means a consisting consists of an outer container that contains two or more units of food of different nature, which are supplemented or mixed for consumption.

We are unclear what is meant by supplemented.

Note: For example, yogurt and cereal.

8. PRESENTATION OF MANDATORY INFORMATION

8.1 General

8.1.3. Where the container is covered by a wrapper, the wrapper shall carry include the necessary information or the label on the container shall be readily legible easily seen and read through the outer wrapper or not obscured hidden by it.

Simplified language with the change from 'carry', 'readily legible' and 'obscured'.

8.1.3.1 The list of ingredients must be included on the outer packaging of joint presentation and/or multipack format, when the packaging is opaque (you cannot see through it) and does not allow such information to be viewed on the food it contains.

Addition in brackets to simplify for CALD manufacturers.

8.1.3.2 The name and address of the product packer must be included on the outer packaging of joint presentations and/or multipack formats when the container is opaque and does not allow such information to be viewed on the food it contains, or when it is different from the manufacturer, packer, importer or exporter of the inside products.

We are not clear on who is the product packer. Can this be defined?

8.1.3.3 The date marking on prepackaged foods in joint presentation and/or multipack formats shall be that of the product with the date closest to completion. This does not exempt each of the individual products that make up the presentation from having their respective date marking.

This is confusing. Is the date marking referring to the date the product is manufactured or the best before/use by date?

8.1.4 The name* and net content** of the food shall appear in a prominent position and in the same field of vision.

*It must be included in the outer packaging of the joint presentations and multipack formats, when the container is opaque and does not allow the names of the foods it contains to be legible easily seen and read.

There may be other reasons other than it is opaque as to why it can't be visualised. It may be just in a position in the pack where the ingredients can't be easily seen, or the information is under the wrinkled part that seals the pack.

**In a multipack, the labelling should provide information on the net content and number of units so that the net content of the individual units and the number of units of food can be easily perceived understood. Preferably, the multipack would indicate the total net content.

Note: The number of units per type of food that make up the multipack must be indicated next to the net content. Example: 600ml (3 units of 200ml)