CODEX ALIMENTARIUS COMMISSION





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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

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27 October – 1 November 2024

GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING (STEP 7)

(Prepared by the Electronic Working Group (EWG) chaired by Canada and co-chaired by India and New Zealand)

Codex Members and Observers wishing to submit comments on the recommendations in this document should do so as instructed in CL 2024/55-FL available on the Codex webpage/Circular Letters: http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/

INTRODUCTION

- 1. The Codex Committee on Food Labelling (CCFL) has considered, since its 44th Session, work on "Innovation use of technology in labelling", which was described as new approaches for providing consumers information about the foods they buy.
- 2. The history of discussions up to CCFL47 is available in CX/FL 23/47/7.
- 3. CCFL47 considered the proposed draft texts, made several edits, and added square brackets for certain provisions. The Committee then agreed to forward the proposed draft *Guidelines* to CAC46 for adoption at Step 5, which were adopted.
- 4. CCFL47 also agreed to re-establish the EWG, chaired by Canada and co-chaired by India and New Zealand, to further develop the draft *Guidelines* for circulation for comments at Step 6 and consideration by CCFL48. This work was to take into account the discussions at CCFL47, with a special focus on the text in square brackets, while noting that the whole document remains open.

PARTICIPATION AND METHODOLOGY

- 5. Two rounds of consultations were conducted within the EWG and several comments were received. The complete list of participants is provided in Appendix III.
- 6. The Chair and co-Chairs of the EWG considered all the feedback/comments received from EWG members during the consultations in the development and updating of the *Draft Guidelines on the Use of Technology to Provide Food Information in Food Labelling*.
- 7. A full summary and analysis of comments is presented in Appendix I and the Draft Guidelines on the Use of Technology to Provide Food Information in Food Labelling is presented in Appendix II.

SUMMARY OF DISCUSSION

- 8. Following the consultations, there was general support that mandatory food information provided solely using technology should be readily identifiable and visible to the consumer, and not cluttered by other marketing information. As well, the reference on the label should link directly to this information. Therefore, it was proposed to adjust the draft text into one provision as opposed to separating this between Sections 7.3 and 7.5. A significant majority of EWG members supported proposed revisions to Sections 7.3 and Sections 7.5.
- 9. There was also agreement on the need for a provision that provides guidance on the length of time mandatory food information provided solely using technology should be available. Members generally agreed that for food

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products with a use-by/expiration date, that food information should be available until this date. For products with a best before date, or those with no date, the appropriate length of time is as long as the food is safe and suitable for sale, consumption, and use.

- 10. There was limited support to re-introduce the text "if its absence could cause harm to the health of consumers" in Section 5.2. As such, this text is not included in the latest draft and the text agreed to at CCFL47 is maintained.
- 11. There was limited support to include "and that there is evidence of similar consumer understanding of the technology" in section 5.1(c) and "[and comply with the data protection policies of parent organizations]" in section 7.6, that had been introduced at CCFL47. As such, this text is not included in the latest draft.
- 12. Some members proposed that Section 7.10 include reference to the information being audible as well as legible. In response to this feedback, [or audible] is included in square brackets for discussion at CCFL48.
- 13. A new section on costs was proposed (Section 7.12) to align with the draft Guidelines on the Provision of Food Information for prepackaged Foods Offered via e-Commerce, specifying that information that is accessed by consumers using technology via a reference on the prepackaged food's label or labelling should be provided without additional costs for the consumer.

CONCLUSION

- 14. The EWG has prepared the *Draft Guidelines on the Use of Technology to Provide Food Information in Food Labelling* (Appendix II), which provides a good representation of consensus in the EWG.
- 15. The Chairs believe that there are no outstanding contentious points to discuss at CCFL48, and that the Guidelines will be ready to advance to Step 8.

RECOMMENDATION

- 16. CCFL48 is invited to:
 - a) review the addition of [audible] in section 7.10 and the new provision on costs in section 7.12 to align with the work on e-commerce.
 - b) consider whether the *Guidelines on the Use of Technology to Provide Food Information in Food Labelling* (Appendix II) is ready to advance to Step 8.

APPENDIX I

FULL SUMMARY OF EWG DISCUSSIONS

First Round of Consultation: Key Points

The Chair and co-Chairs provided the first draft of the Guidelines on the Use of Technology to Provide Food Information in Food Labelling to EWG members in September 2023.

These draft *Guidelines* reflected the discussion by members at CCFL47 in CX/FL 23/47/7 and the Report of CCFL47 (REP23/FL). In addition to inviting general comments on all sections of the draft *Guidelines*, comments on nine (9) specific questions were requested:

- Questions 1 and 2 pertained to proposed text in Sections 7.3 and 7.5 related to commercial information, marketing, or advertising. It was noted that on the physical label, commercial/marketing information is not restricted or required to be separated from other food information.
- Question 3 was about the provision regarding the duration that mandatory food information referenced on a label should be available.
- Question 4 was about the following text in square brackets in Section 7.6: [and comply with the data protection policies of parent organizations].
- Questions 5 to 9 sought EWG member feedback on whether they supported Sections 7.7 to 7.11 of the Draft Guidelines.

Feedback on the First Round of Consultation and Revisions to the Draft Guidelines

Several comments were received on the nine questions, as well as on other aspects of the text. The responses were used to update the draft *Guidelines*.

There was general support or acceptance that mandatory food information should be readily identifiable and visible to the consumer, and not cluttered by other marketing information. Therefore, it was proposed to adjust the draft text to specify the desired outcome of members, in one provision as opposed to separating this between Sections 7.3 and 7.5. As much of the input was qualitative, quantifying numbers of EWG members in support was not done until the next round of consultation.

There was also agreement among EWG members that there needs to be a provision that provides guidance on the length of time food information should be available. Members generally agreed that for food products with a use-by/expiration date, that food information should be available until to this date. For products with a best before date, or those with no date, the appropriate length of time is as long as the food is safe and suitable for sale, consumption, and use. The chair and co-chairs therefore provided draft revisions to section 7.5 that address the above feedback, using descriptive language instead of "shelf life" and the GSLPF terms of use-by-date and expiration date, where applicable. As much of the input was qualitative, quantifying numbers of EWG members in support was not done until the next round of consultation when a revised proposal was presented.

EWG members were also asked if they support the following text in Section 7.6 of the draft guidelines: "[and comply with the data protection policies of parent organizations]". Responses revealed that 12/14 members and 7/8 observer organizations did not support its inclusion, 2 did not respond, and 1 provided edits, leading to the conclusion that there was no support for the text in square brackets as written. The majority commented that the text is out of scope of Codex, and CCFL in particular, and that the text in square brackets could be removed. Reasons provided included that any broader laws and protections that exist to protect the privacy and data/information of individuals would apply anyway and that it is not necessary in a Codex text to state that food information must follow those laws. Based on this feedback, this text was struck out.

With respect to Sections 7.7 to 7.11, which had been placed in square brackets at CCFL47, these were supported overall, with some comments, and were largely retained as drafted. The level of support for these sections was as follows:

- Section 7.7: 20/24 EWG members (13/16 members and 7/8 observers) supported the text as written, others with editorial suggestions that did not change the nature of the text
- Section 7.8: 19/24 EWG members (12/16 members and 7/8 observers) supported the text as written, others with editorial suggestions that did not change the nature of the text

 Section 7.9: 18/21 EWG members who responded supported the section and the other 3 did not respond

 Section 7.10: 20/24 EWG members (15/16 members and 5/8 observers) supported or partially supported the section.

Regarding Section 7.11, which is about the language that food information is provided in, 15/22 EWG members (11/16 members and 4/6 observers) supported this section. Of those that did not support, some suggested that wording should be added so that the language is suitable to the consumer in the country in which the food is intended to be marketed. They suggested that this addition would prevent the original company applying a link or QR code from having to provide information in additional languages than the original intended market if it is resold in other countries. This change was not made because the addition could eliminate the responsibility of food business operators (FBO) that import and sell prepackaged food in another country that the manufacturer did not intend for it to be sold, from providing the food information in the language of the importing country.

In addition to responses about the questions that were asked, EWG members also commented on the following topics:

- There were several comments about how to use these guidelines, and regarding a lack of clarity about the purpose of Section 3, as well as Section 7.4. The following clarifications were offered:
 - Section 3 was added during CCFL47 and is intended to remind readers and users of these draft guidelines that they apply at the same time as other Codex texts. For example, the GSLPF and General Guidelines on Claims continue to apply to food labels where the references to food information provided through technology are found.
 - Section 7.4 is intended to clarify that food information provided through technology needs to adhere to the same provisions as when the information is provided on the label. For example, if an organic or halal claim is made on a technological platform, it would still be subject to the relevant Codex text. If certain information is mandatory for a particular commodity, like country of origin, it would be considered mandatory food information for the purpose of these draft guidelines.
- There were various comments on the use of "should" vs. "shall" throughout the text. In particular, several members suggested that sections relating to the provision of mandatory food information should use "shall" language, to be consistent with the GSLPF. Based on these comments, edits were made to the revised draft to use "shall" many of the principles in section 7.
- Comments were received on the heading for Section 5, suggesting it should refer to "food information" rather than "food labelling information", for consistency and given the definition in the text. The title of Section 5 was adjusted based on this feedback.
- Some members suggested that the previously drafted text of Section 5.2 underlined below be retained, or
 questioned the value of the text without it: 5.2 Name of the food and food information concerning health and
 safety should not be provided exclusively using technology, if its absence could cause harm to the health of
 consumers.
 - It was felt by these members that not including this text would limit the usefulness of these draft guidelines and that they would not be future proof, as it would result in most mandatory labelling information never being eligible to be replaced by technology. Further, it is noted that there are examples internationally of jurisdictions where nutrition information on certain prepackaged foods is permitted to be provided using technology, and retaining the underlined text would best align with emerging practices. Based on these comments, the underlined text was re-introduced in square brackets for the next round of consultation in the EWG.
- Comments were received that Section 6 should be amended to include reference to the use of technology in emergency situations. At CCFL47, related text was removed given the concurrent work on a discussion paper specifically related to flexibilities in emergency situations.
- Some EWG members commented that the text "there is evidence of similar consumer understanding of the
 technology" in section 5.1 (c) is unclear as to its intent and what the understanding is similar to. For example,
 it could be interpreted to be about evidence that consumers understand the food information or that they
 understand how to use the technology. This text was added at CCFL47. In response to this feedback, EWG
 members were asked to comment on this text in the second round of consultation.

Second Round of Consultation: Key Points

The Chair and co-Chairs issued the second draft of proposed *Guidelines on the Use of Technology to Provide Food Information in Food Labelling* to EWG members in February 2024. A summary of feedback received during the first consultation was also shared at this time.

This consultation included specific questions on:

- The proposed revisions to Section 7.3 and preferences about wording.
- The proposed revisions to Section 7.5.
- The re-introduction of the text "if its absence could cause harm to the health of consumers" in Section 5.2.
- The text "there is evidence of similar consumer understanding of the technology" in section 5.1 (c)

Members were also invited to provide any other comments on the draft Guidelines.

Feedback on the Second Round of Consultation and Revisions to the Draft Guidelines

A significant majority of EWG members (22/26 respondents) supported proposed revisions to Sections 7.3. There were a few suggestions to adjust the wording for clarity, which are presented in Appendix II. EWG members were also asked to comment on preferred wording between directly, clearly and in a clear manner as follows:

Where mandatory food information is provided solely using technology, the reference on the label shall link [directly/clearly/in a clear manner] to this information.....

While there was a variety of feedback, "directly" was the most favoured option by Codex members as it was seen as the most suitable wording to convey the intent.

A strong majority of EWG members (23/26 respondents) supported proposed revisions to Sections 7.5. These adjustments were therefore retained, with the addition of "solely", which was suggested by some EWG members, as presented in Appendix II.

There was limited support to re-introduce the text "if its absence could cause harm to the health of consumers" in Section 5.2. Only 2/26 EWG members supported, while 10/26 did not, and 13/26 indicated changes would be necessary in order for it to be workable. While re-introducing it would future proof the guidelines, it could also introduce more questions about the interpretation of health and safety information and when its absence from the physical label would or would not cause harm to the health of consumers. As such, this text is not included in the latest draft and the text agreed to at CCFL47 is maintained.

The majority of respondents (21 of 25) to the second consultation supported removing the text "there is evidence of similar consumer understanding of the technology" from Section 5.1(c). Comments received were that this text is not clear, it is redundant, and may be onerous to implement. The revised draft has this text removed.

The majority of EWG members either supported or did not comment on the amendments to the title of Section 5. As such, the changes proposed in the second consultation are retained in Appendix II. For consistency, corresponding changes were made to the title of Section 6 to remove the word "mandatory" before food information.

A few EWG members suggested new revisions to Section 7.6. Some of these related to changing the term "individual" to "person or organization". This was not changed as the purpose of these guidelines is to provide guidance on the use of technology to provide information to consumers about prepackaged foods". Individuals working for organizations would be covered by the existing wording. There was an editorial suggestion to change "is used to identify an individual" to "may be used to identify an individual" that was incorporated in Appendix II.

Some members of the EWG proposed that Section 7.10 include reference to the information being audible as well as legible. Although the labelling framework in CCFL is designed around print labels, section 7.10 is not providing permission to provide labelling information audibly, it is simply saying that if audio is used, it must be audible. In response to this feedback [or audible] is included in square brackets in Appendix II for discussion at CCFL48.

One member proposed to add a new section on costs, specifying that information that is accessed by consumers using technology via a reference on the prepackaged food's label or labelling should be provided without additional costs for the consumer. While this comment only came from one Codex member, the proposed addition was deemed to be important as it would align these Draft Guidelines with the PROPOSED DRAFT GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PREPACKAGED FOODS OFFERED VIA E-COMMERCE. Therefore, a new provision, Section 7.12, was added in Appendix II.

APPENDIX II

DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING

(changes following adoption at Step 5 are presented as **bold-underline** additions and strikethrough deletions))

1. PURPOSE

Provide guidance on the use of technology to provide information to consumers¹ about prepackaged foods¹.

2. SCOPE

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

3. USE

These guidelines should be read in conjunction with Codex texts related to labelling of prepackaged foods, including but not limited to *General Standard for the Labelling of Prepackaged 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 prepackaged 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 REQUIRED ON A PREPACKAGED FOOD'S LABEL OR LABELLING 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.
- **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

6.1 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.

7. PRINCIPLES THAT ARE APPLICABLE WHEN FOOD INFORMATION IS PROVIDED TO CONSUMERS USING TECHNOLOGY

Food information that is accessed by consumers using technology via a reference on the prepackaged food's label or labelling **shall**should be based on the following principles, whether the food information is required on a mandatory basis or provided voluntarily:

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

- **7.1** The general principles in Section 3 of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) are applicable to food information that is described or presented using technology.
- **7.2** Food information described or presented using technology shall not conflict with information provided on the label or labelling of the prepackaged food, including when shown in different languages.
- [7.3] Where mandatory f Food information is provided solely described or presented using technology, the reference on the label or labelling shall link directly to this information, and the mandatory food information, shall be presented in one place, readily identifiable, grouped together, and easily distinguishable separately from other commercial information intended for sale or marketing purposes.]
- **7.4** Where food information is provided using technology, the food information shall be shown in accordance with applicable Codex texts.
- 7.5 Where mandatory food information is <u>solely</u> provided using technology, the reference on the label or labelling should link directly to this information and the food information <u>shall</u>should be available for the duration of the food's shelf life [at least and not less than best before date or expiry date]. [The link shall not include advertising² pertaining to the food.] at least the period, established under intended conditions of distribution, storage, retail and use, that the food would remain safe and suitable for sale, consumption or use. For prepackaged food that are labelled with a use-by date or expiration date, this means for at least the period up to and including this date.
- **7.6** Food information described or presented using technology <u>shall</u>should be readily accessible to consumers [and comply with the data protection policies of parent organizations] without having to provide or disclose information that is may be used to identify an individual.
- 7.7 [When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable consumers to ascertain that the food information pertains to that prepackaged food.
- **7.8** If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to consumers, it **shall**should be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").
- **7.9** The reference and any explanatory statement shown on the label or labelling that links to food information to be accessed using technology **shall**should adhere to sections 8.1.2 and 8.1.3 of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).
- **7.10** Food information described or presented using technology shall be clear, prominent and readily legible **[or audible]** to the consumer under normal settings and conditions of use of the technological platform.
- **7.11** The language or languages of food information described or presented using technology shall be suitable to the consumer in the country in which the food is marketed.
- [7.12Where food information is provided using technology, it shall be provided without any additional costs for the consumer.]

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² As defined in the Guidelines for Use of Nutrition and Health Claims (CXG 23-1997)

GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING

(clean version)

1. PURPOSE

Provide guidance on the use of technology to provide information to consumers³ about prepackaged foods¹.

2. SCOPE

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

3. USE

These guidelines should be read in conjunction with Codex texts related to labelling of prepackaged foods, including but not limited to *General Standard for the Labelling of Prepackaged 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 prepackaged 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 INFORMATION REQUIRED ON A PREPACKAGED FOOD'S LABEL OR LABELLING 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.
- **5.2** Name of the food and food information concerning health and safety should not be provided exclusively using technology.
- **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 FOOD INFORMATION THAT IS NOT ACCESSIBLE ON THE LABEL

6.1 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.

7. PRINCIPLES THAT ARE APPLICABLE WHEN FOOD INFORMATION IS PROVIDED TO CONSUMERS USING TECHNOLOGY

Food information that is accessed by consumers using technology via a reference on the prepackaged food's label or labelling shall be based on the following principles, whether the food information is required on a mandatory basis or provided voluntarily:

7.1 The general principles in Section 3 of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) are applicable to food information that is described or presented using technology.

³ As defined in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)

- **7.2** Food information described or presented using technology shall not conflict with information provided on the label or labelling of the prepackaged food, including when shown in different languages.
- **7.3** Where mandatory food information is provided solely using technology, the reference on the label or labelling shall link directly to this information, and the mandatory food information shall be readily identifiable, grouped together, and easily distinguishable from other information.
- **7.4** Where food information is provided using technology, the food information shall be shown in accordance with applicable Codex texts.
- 7.5 Where mandatory food information is solely provided using technology, the food information shall be available for at least the period, established under intended conditions of distribution, storage, retail and use, that the food would remain safe and suitable for sale, consumption or use. For prepackaged foods that are labelled with a use-by date or expiration date, this means for at least the period up to and including this date.
- **7.6** Food information described or presented using technology shall be readily accessible to consumers without having to provide or disclose information that may be used to identify an individual.
- 7.7 When the label or labelling of a prepackaged food references food information to be accessed using technology, sufficient information shall be displayed on the technology platform to enable consumers to ascertain that the food information pertains to that prepackaged food.
- **7.8** If the purpose of the reference on the label or labelling of the prepackaged food is not self-explanatory to consumers, it shall be accompanied by an explanation of how to use it or the type of food information that will be found when used (e.g. "scan here for more information on ingredients").
- **7.9** The reference and any explanatory statement shown on the label or labelling that links to food information to be accessed using technology shall adhere to sections 8.1.2 and 8.1.3 of the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).
- **7.10** Food information described or presented using technology shall be clear, prominent and readily legible or audible to the consumer under normal settings and conditions of use of the technological platform.
- **7.11** The language or languages of food information described or presented using technology shall be suitable to the consumer in the country in which the food is marketed.
- **7.12** Where food information is provided using technology, it shall be provided without any additional costs for the consumer.

APPENDIX III

List of EWG Participants

Members
Argentina
Australia
Belgium
Brazil
Canada
Chile
China
Columbia
Costa Rica
Denmark
Dominican Republic
Ecuador
Egypt
European Union
Guatemala
Guyana
Hungary
India
Indonesia
Japan
Malaysia
New Zealand
Norway
Paraguay
Philippines
Republic of Korea
Saudi Arabia
Singapore
Spain
Sweden
Switzerland
South Africa
Thailand
Türkiye

Uganda
United Kingdom
USA

Observers

Alianza Latinoamericana de Asociaciones de la Industria de Alimentos Y Bebidas (ALAIAB)

Directorate-General for Consumer Affairs – Spain (DGCA)

European Federation of Allergy and Airways Diseases Patients' Associations (EFA)

Food Industry Asia (FIA)

Fédération internationale des vins et spiritueux (FIVS)

FoodDrinkEurope (FDE)

International Alliance of Dietary/Food Supplement Associations (IADSA)

International Confectionery Association (ICA)

International Council of Beverages Associations (ICBA)

International Chewing Gum Association (ICGA)

International Council of Grocery Manufacturers Associations (ICGMA)

International Dairy Federation (IDF)

International Fruit & Vegetable Juice Association (IFU)

International Special Dietary Foods Industries (ISDI)

International Organization for Standardization (ISO)

Organisation internationale de la vigne et du vin (OIV)

Danone Argentina SA

Asociación de Empresas de Nutrición Infantil

Council for Responsible Nutrition (CRN)