
CODEX CCFL – EWG on Labelling of Foods Sold in Joint Presentation and Multipack Formats

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AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

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OVERVIEW

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to respond to the Codex Committee on Food Labelling (CCFL) request for comments on the the Labelling of Foods Sold in Joint Presentation and Multipack Formats.

It provides the following submission to assist the Australian Delegation leader prepare country comment.

RESPONSES

Question 1: Do you support the proposed amended section 8.1.3.1? Yes ___ **No X** ___

If no, what do you suggest to achieve the objectives of this work stream?

Although we can support the overall changes to Section 8.1.3.1 given its importance to Member states, we believe the wording of Section 8.1.3.1(b) can be made more concise and clearer in intent. Additionally, we think it would be best to clarify that when the differences are visible through the transparent outer packaging, no additional, duplicative information is needed on the transparent outer packaging. Therefore, we suggest replacing 8.1.3.1 (b) with the following:

When there are differences in mandatory labelling information between the individually packaged foods and the transparent outer packaging ~~of the prepackaged food that is sold as a single unit~~, **such differences** ~~only the differing information~~ must **be visible through the transparent outer packaging or otherwise** appear on the outer packaging.

(e.g. **when** the name and address of the manufacturer **for the outer package is different from the manufacturer of the inner packages.**) ~~, etc. of the prepackaged food that is sold as a single unit is different from one or more of those of the individually packaged foods~~

Question 2: Do you support the revised section 4.3.4? Yes ___ **No X** ___

Please explain and provide any suggestions.

Although we support providing net content information to consumers, we emphasise that as 4.3.4 is currently drafted, this text does not permit flexibility in how this information may be presented. As proposed, it would require displaying both the total net content as well as the number of units in the multipack and the corresponding net content of each unit. However, there are countries that do not require the inclusion of the “total net contents” on multipack labels, based on consumers’ preferences. For example, in the European Union, Japan, New Zealand, Australia and many countries in the Africa region do not require the total net contents and simply state only the number of units and their respective individual net content on the outer package. Therefore, making the total net content optional would allow for flexibility based on known country-specific requirements. Moreover, to avoid potential confusion, we recommend reducing the number of examples in the text.

Therefore, we propose the following wording:

4.3.4 For prepackaged foods that are subject to section 8.1.3.1 and intended to be consumed separately, the number of individually packaged foods per type, and their respective net contents, **may shall** be stated on the container of prepackaged food next to the declaration of total net contents. For example, **“3 units of 200mL” or “600mL (3 units of 200mL)” or other equivalent indication** ~~or “600 mL (2 units of 100 mL and 2 units of 200 mL)”~~. This does not apply if, despite 8.1.3.1. (b), the number of individually packaged

foods can easily be counted through the transparent outer package wrapping, and their net quantities per type easily identified.

References:

- European Union: Annex IX of Regulation (EU) N2. 1169/2011 <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:en:PDF>
- New Zealand: <https://trademeasurement.tradingstandards.govt.nz/for-business/packaging-and-or-selling-goods-by-quantity/food-quantity-labelling-requirements-and-exemptions/>
- Australia: <https://www.legislation.gov.au/F2009L03479/latest/text>

Question 3: Do you support the revised section 4.7.1? Yes ___ **No X** ___

Please explain and provide any suggestions.

We consider the proposed new language to be clearer, including using the term “earliest date” instead of “closest to completion.” However, to ensure that earliest date marking does not refer to the date of manufacture, but to the best-before or expiration date, we recommend the following changes:

4.7.1 (vi) bis: For prepackaged foods subject to section 8.1.3.1, the manner to provide the **best-before date, best quality-before date, use-by date or expiration date** is to either declare the date of the individually packaged food with the earliest date on the outer container, or, despite 8.1.3.1 (b), to ensure at least the earliest date is visible on the inner units.

Question 4: a) Do you support the proposed revision to section 4.2.1?

Yes X No ___

If no, why not.

b) Do you agree that the proposed text “as applicable in accordance with Section 8.3” addresses the concerns raised regarding the allergen statement?

Yes X No ___

For Section 4.2.1(b), we appreciate that the proposed new language introduces more flexibility to include the ingredients and allergen statement(s) either separately or as a single combined list(s). However, we propose that there could be further discussion by the eWG on the allergen statement and potential implications for this approach.

Question 5: Do you have any additional comments or suggestions on the labelling of foods sold in joint presentation and multipack formats?

No.

For further information about the contents of this submission contact:

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