



Council for Responsible Nutrition

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VIA ELECTRONIC SUBMISSION

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Re: Respectfully request consideration of CRN and CRN Member Company comments for the Codex Committee on Food Labelling (CCFL) regarding the Circular Letter request for comments on the discussion paper on sustainability labelling claims (CL 2023/16/OCS-FL).

CRN¹ has been an active participant at the Codex Alimentarius Commission (CAC), Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), and the Codex Committee on Food Labelling (CCFL) meetings and on relevant electronic Working Groups (eWGs), regarding a number of industry-specific issues and concerns. CRN has championed current scientific-thinking and organized and helped promote scientific conferences and symposia focused on public health objectives.

¹ The Council for Responsible Nutrition (CRN), founded in 1973, is a Washington, D.C.-based trade association representing 200 dietary supplement and functional food manufacturers, ingredient suppliers, and companies providing services to those manufacturers and suppliers. In addition to complying with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety, our manufacturer and supplier members also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Visit www.crnusa.org. Follow us on Twitter [@CRN_Supplements](#), [Facebook](#), and [LinkedIn](#).

The February, 2023 Circular Letter requested comments on the recommendations in the “Discussion paper on sustainability labelling claims” as follows: (A) Whether CCFL should initiate new work on sustainability-related labelling (does the discussion paper provide sufficient information to support new work); (B) That such work should be limited to high-level guidance and principles for developing sustainability-related labelling on food; and (C) Any other comments to improve the associated project document entitled “Proposal for new work on sustainability-related labelling”.

CRN appreciates New Zealand and the European Union and the work they invested in preparing the discussion paper on sustainability-related labelling claims.

CRN and CRN Members offer the following responses to the three questions posed in the Circular Letter.

A. Whether CCFL should initiate new work on sustainability-related labelling (does the discussion paper provide sufficient information to support new work).

- CRN and CRN Members support seeking a Codex consensus on sustainability labeling to help ensure consumers are appropriately informed, marketplaces are fair, and the transition towards more sustainable food systems is accelerated. We deem that the discussion paper provides sufficient information to initiate the work defined.

B. That such work should be limited to high-level guidance and principles for developing sustainability-related labelling on food.

- CRN and CRN Members support the publication of a high-level guidance establishing a common framework as a first priority in the short-term given the rapidly evolving sustainability labelling environment; starting with tackling purpose, scope, definitions and general principles.

C. Any other comments to improve the associated project document – “Proposal for new work on sustainability-related labelling”.

- For environmental labeling, if not included in this first guidance, the CRN and CRN Members support would recommend defining, soon after, a workable scheme, based on

life cycle assessment of food products, to enable a science-based and quantitative assessment, operable across borders. The metric should have a sufficient level of granularity to allow consumers driving improvements in production systems, favoring the resorting to primary data, and reporting the environmental impacts holistically, beyond carbon.

Conclusion and Summary

- **CRN and CRN Members, at a minimum, need to have sustainability claims included in the general Guidelines on Claims (CXG 1-1979), which means a call for clear and science-based substantiation, to the same extent as for other claims.**
- **CRN and CRN Members fully support the New Work Proposal that would dedicate a Codex work stream to help tackle green washing on food products, and ultimately efficiently decrease the footprint of food systems, along SDG12 (sustainable production and consumption).**

CRN and CRN Members respectfully requests that the U.S. Codex delegation to CCFL consider our comments in the spirit in which they are being offered, and our full support for the current New Work Proposal on Sustainability-Related Labelling.

Respectfully submitted,



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