

Food Sold Online - Issues for Consideration

To assist with your review of the guideline, please consider the following

1. Ensuring Consistency Between Label, Product Image and Online Text

Industry already uses packaging artwork systems and product catalogues to manage this information, but misalignment can occur when physical labels change faster than digital records. Consistency is essential for consumer trust, particularly for allergens and nutrition.

2. Use of Established Trade Item Identifiers (e.g., GTIN)

Most manufacturers and retailers structure online product catalogues using the **Global Trade Item Number (GTIN)** - an industry-wide identifier used across retail, logistics and e-commerce. Any policy approach should recognise that GTIN is the foundational key for linking label information, product images and online descriptions.

3. Managing Product Variants and Formulation Changes

Industry uses the **GTIN Allocation Rules** to determine when a new GTIN is required (e.g., major formulation changes). For smaller recipe or ingredient changes where the GTIN remains the same, many suppliers use variant or artwork IDs; globally, the **GS1 Consumer Product Variant (CPV/CVP)** standard is increasingly used to distinguish these versions. These mechanisms help maintain accuracy when multiple versions exist simultaneously.

4. Maintaining Accurate and Up-to-Date Product Images

Product images are often the primary source of information for online shoppers. GS1's **Product Image Standards and Guidelines** are already widely used by suppliers and retailers to ensure images match pack design and mandatory information. These provide a helpful reference point for improving consistency online.

5. Handling Multiple Versions of a Product in Market at the Same Time

When older and newer versions of a product exist concurrently, online stores need a practical way to distinguish them. Current industry practice varies - some retailers display multiple listings, while others ship whichever stock is available. Clear expectations will reduce confusion and potential safety risks.

6. Role of Evolving Data Carriers (e.g., 2D Barcodes)

Although not part of the current guideline, industry is increasingly moving to **2D barcodes** that can encode more information than the traditional linear barcode -

including GTIN and variant identifiers. These technologies will support greater accuracy between physical and online information in future.

7. Disclaimers Alone Cannot Address Underlying Data Accuracy Needs

Industry commonly uses “please check the physical label” statements, but these are only effective when online information is otherwise well maintained. Disclaimers should supplement — not substitute — accurate product data.

8. Alignment With International Food Information Expectations

Codex and EU Regulation 1169 both expect online information to mirror mandatory on-pack details (excluding batch/date). Aligning with these international frameworks supports exporters and multinational brands using the same product catalogues across markets.

9. Supporting All Parts of Industry, Including Small Suppliers

Any policy guideline should consider the varying technical capabilities of large manufacturers, small producers, online retailers and delivery platforms - and ensure expectations are practical and proportionate.

10. Importance of Recognising, Not Replacing, Existing Data Standards

The food industry already relies on a suite of established standards (GTIN, image standards, data synchronisation practices). Recognising these existing frameworks will help minimise cost, avoid duplication, and support efficient implementation across the sector.

For More Information Contact

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