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EU-CENTRAL AMERICA
ASSOCIATION AGREEMENT

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REGULATIONS APPLICABLE TO LABELLING, PACKAGING AND SPECIFIC REQUIREMENTS FOR PACKAGED FOODS AND BEVERAGES IN THE 6 CENTRAL AMERICAN COUNTRIES

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Acronyms

AA	EU-Central America Association Agreement
CACU	Central America Customs Union
CFS	Committee on World Food Security
COMISCA	Council of Ministers of Health of Central America and the Dominican Republic
DRV	Daily Reference Value
FAO	Food and Agriculture Organization
FOPNL	Front of Package Nutritional Labeling (EFNA in Spanish)
MINSA	Ministry of Health of Panama (Ministerio de Salud in Spanish)
RTCA	Central American Technical Regulation (Reglamento Técnico Centroamericano)
SICA	Central American Integration System (Sistema de la Integración Centroamericana)
SIECA	Economic Integration Central American Secretary (Secretaría de Integración Económica Centroamericana SIECA)
TBT	Technical Barriers to Trade
WHO	World Health Organization
WTO	World Trade Organization

1. Food products and alcohol labelling in the EU-Central America Association Agreement

The EU-Central America Association Agreement (AA) [1] aims -inter alia- to remove barriers to trade between the Parties. In some cases, labelling of food products and alcohol may result in obstacles to international trade, and the AA seeks to ensure that measures or regulations taken by any of the signatory parties comply with strict rules and limits.

Article 138 of the AA deals with "Marking and Labelling", and refers to Article 1 of Annex 1 of the WTO Agreement on Technical Barriers to Trade (TBT)[2], and states that when technical regulations require any marking or labelling requirements the Parties will observe the principles of Article 2.2 of the TBT Agreement, in particular:

a) To require only marking or labelling relevant to consumers or users of the product or to indicate the product's conformity with the mandatory technical requirements.
b) If it is necessary in view of the risk of the products to human, animal or plant health or life, the environment, or national safety, the Parties may: (i) require the approval, registration or certification of labels or markings as a precondition for sale on their respective markets; or (ii) establish requirements on the physical characteristics or design of a label, in particular that the information be placed in a specific part of the product or in a given format or size. The above is understood without prejudice to the measures adopted by the Parties pursuant to their internal rules to check the compliance of labels with the mandatory requirements and measures they take to control practices which may mislead consumers.
c) Where a Party requires the use of a unique identification number by economic operators, it shall issue such a number to the other Party's economic operators without undue delay and on a non-discriminatory basis.
d) Provided it is not misleading, contradictory or confusing in relation to the information required in the country of destination of the goods, the Parties shall permit the following: (i) information in other languages in addition to the language required in the country of destination of the goods; (ii) international nomenclatures, pictograms, symbols or graphics; and (iii) additional information to that required in the country of destination of the goods;
e) The Party shall, where legitimate objectives under the TBT Agreement are not compromised and the information can properly reach the consumer, endeavor to accept nonpermanent or detachable labels, or marking or labelling in the accompanying documentation rather than physically attached to the product; and
f) The Parties shall allow that labelling and corrections to labelling take place in the country of destination prior to the commercialization of the goods.

Furthermore, as per the AA, the Parties must ensure that technical regulations are not prepared, adopted or applied with a view to or with the effect of creating unnecessary obstacles to international trade. For this purpose, technical regulations shall not be more trade-restrictive than necessary to fulfil a legitimate objective, taking account of the risks non-fulfilment would create. Such legitimate objectives are, inter alia: national security requirements; the prevention of deceptive practices; protection of human health or safety, animal or plant life or health, or the environment. In assessing such risks, relevant elements of consideration are, inter alia: available scientific and technical information, related processing technology or intended end-uses of products.

[1] https://trade.ec.europa.eu/access-to-markets/en/content/eu-central-america-association-agreement#costarica_technicalreq
[2] https://www.wto.org/english/docs_e/legal_e/17-tbt_e.htm

2. Central American regulations

2.1. Overview

The Secretariat for Central American Economic Integration (Secretaría de Integración Económica Centroamericana, SIECA) is the technical and administrative unit that guides and coordinates the economic integration agenda, in which technical regulations are analyzed and resolved.

As part of the Central American harmonization process, Ministries of Economy have published the Central American Technical Regulations, (RTCAs in Spanish) including those that deal with packaging, labeling, liquors and spirits, approved additives, infant food, sanitary license and registration of products. These RTCAs apply to all Central American countries, though the extent of the implementation and interpretation may vary from country to country.

The following regulations (section1) are based on the RTCAs provisions and apply in general in Costa Rica, El Salvador, Guatemala, Honduras, and Nicaragua. For Panama regulations see section 4, below. In addition, each country may establish additional requirements for individual products. A description of specific regulations applicable in some Central American countries is included in section 3 of this document. It is always advisable to verify the updated requirements with the importer in each country,

2.2. Central America labelling requirements

2.2.1. General labelling

Labeling of processed food products, domestic or imported food products is regulated in the RTCA 67.01.07:10[3], which is based on the CODEX general rule for food labeling. Non processed foods are exempt from labeling. Spices and herbs (cut in pieces less than 10 cm^2), including broths, chewing gums, confectionery, and others individually packaged products small enough, where the outside bigger packaged is labeled are also exempt.

Labeling is informative, must not misguide the consumer, and must not present false claims. Food products must have labels in Spanish, but these can be complementary to the original label and may be stick-on labels applied by the exporter in the country of origin or the importer once the product is in the Central American country and prior to retail sale. However, in general stick-on labels may not be used to indicate the manufacturing or expiration date.

In the Spanish labels, the following information must be provided:

- Name of the product: official name as determined on the Committee on World Food Security (CFS).
- Description of the product: should be specific and based on the RTCA 67.01.07:10 food categories or, alternatively, on CODEX food categories and may not necessarily translate exactly as the name in English. On the front label, the type of presentation, condition, or treatment (such as dehydrated, concentrated, reconstituted, smoked, pasteurized, etc.) must be specified. If it is an imitation product, it should be named according to its main ingredients; imitation names are not permitted.
- Net weight/volume, in metric units:
    - Liquids: in volume (milliliter or liter).
    - Solids: in weight (grams or kilograms).
    - Semisolids: in weight and volume if viscous.
    - Solid or semisolid packed in a liquid medium: weight without the liquid.

[3] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/280-2012ANEXO.pdf

- List of ingredients (including allergens) and additives: except in the case of single-ingredient food products, a list of the ingredients must appear on the product label. The term "Ingredients" must be written before the list or as the first word in the list. Ingredients must be displayed from the highest to lowest content. If one of the ingredients is displayed on the front panel, or if the product is a mix or combination which characterizes the nature of the food, the ingredients must be declared in percentage composition.
    - All food additives and ingredients that may cause an allergy or an undesired effect in people, such as skin irritation, inflammation of respiratory airways, among others, must be declared even though they may be present in the food product without forming an essential part of it. The norm includes a list of such ingredients for reference (eggs and egg products, fish and fish products, crustaceans, gluten containing cereals, milk, and milk products, soja, peanuts, etc.).
    - Added water must be indicated in the list of ingredients, except when it is a part of an ingredient, such as brine, syrup, or broth used in a composite food product and stated as such in the list of ingredients. Volatile ingredients (such as water and others) used in the manufacturing process need not be stated.
- Storage instructions and form of preparation, if any: preparation instructions, including the need for cooking, or "keep refrigerated" or "keep frozen", when applicable.
- Expiration date: the expiration date must be stated with "Better before" or "Better before the last day of". If the expiration date is less than 3 months, it must be specified in Spanish format (day/month/year); the day/month can be interchanged if the month appears in letters (or its abbreviation). For expiration dates longer than 3 months, the month and year are enough (month/year). Products exempt from expiration date are:
    - Wine, liqueur wines, sparkling wine, flavored wines, flavored wines, fruit wines, fruit sparkling wine.
    - Alcoholic beverages with 10% or more alcohol per volume.
    - Vinegar.
    - Food grade salt.
    - Solid sugar.
    - Confectionery products consisting of flavored or colored sugars.
    - Chewing gum.
- Registration number (assigned by Food Control of the Ministry of Health or corresponding authority).
- Country of origin: when the product undergoes a manufacturing process that changes the nature of the product in a second country, the country where the transformation is carried out will be held as the product's country of origin.
- Lot production identification (Lot, Lot Number, Lot date), either written in plain language or in code, and it must be un-erasable.
- Name and address of the importer or local distributor.
- Radiation: if the product has an irradiated ingredient, it must be declared in parenthesis after the listed ingredient. If the product is based on one ingredient only, from an irradiated raw material, it must be indicated in the front panel. The radiation symbol is optional.

2.2.2. Label presentation

Labels applied to prepackaged food products must be placed so that they do not separate from the package. All the mandatory information must be written in clear, visible, un-erasable, easy-to-read characters, to be read by consumers in normal purchase and use circumstances. The food product name and net content must be prominently stated so that they are easily visible.

When the package is wrapped, the external wrapping must contain all data required. Otherwise, the product label must be easily readable through the wrapping or the wrapping must not obscure it.

2.2.3. Nutritional labeling

Nutritional labeling is regulated by RTCA 67.01.60:10[4], which has no corresponding CODEX Standard Norm. Accepted claims may include the following: comparative properties, nutritional properties or descriptors, relative properties according to the nutrient function, relative properties for the content of the nutrient, proven health claims, disease risk reduction, healthy diet declarations, and fortification or enrichment. False claims or false comparisons with other products are not acceptable. Stickers are also allowed for nutritional labeling.

Nutritional labels must include:

- Energy value specified in kilo Jules (KJ) per 100 g or 100 ml or portion if provided; calories are optional.
- Total fat.
- Saturated fat (only if the content is above 0.5 g/portion; if below 0.5 g/portion, it may show as 0 g or below, and the nutritional table must declare "not a significant source of saturated fat").
- Carbohydrates.
- Protein.
- Sodium (only if the content is above 5 mg/portion; if below 5 mg, it may show as 0 mg or below the nutritional table it must declare "not a significant source of sodium").
- If a claim is made for the type of carbohydrate, the nutritional table must declare sugars and starches.
- If a claim is made for the type of fat, the nutritional table must provide content of cholesterol, saturated, and non-saturated (mono- and poly-fats).
- If a claim is made for fiber, the label must declare if it is dietary fiber or soluble or insoluble fiber.
- Vitamin and mineral content must be declared according to the international system or in Daily Reference Value (DRV), according to FAO/WHO; if another reference is used, the source must be spelled out.
- Declared macronutrients and sodium have a +/- 20% tolerance, and micronutrients need to have at least 80% of the declared content, except in the case of fortified products.

It is also worth mentioning that there is a draft RTCA[5] under discussion, to require Front of Package Nutritional Labeling (FOPNL, or EFAN in Spanish). This draft has no corresponding Standard Norm and is based on the Council of Ministers of Health of Central America and the Dominican Republic (COMISCA) 20-2019 Resolution.[6]

The draft RTCA would require all packaged foods (with few exceptions) to display FOPNL signs when certain amounts of fats, sugars or sodium are exceeded, or when specific ingredients (trans fats and sweeteners listed in RTCA 67.01.07:10) are included.

[4] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/281-2012ANEXO.pdf
[5] http://incap.int/index.php/es/listado-de-documentos/repositorio-efan/politicas-efan/397-efan-rtca-propuesta-incap/file
[6] https://www.sica.int/documentos/resolucion-comisca-20-2019-relativa-al-reglamento-tecnico-centroamericano-de-etiquetado-frontal-de-advertencia-nutricional-rtca-efan_1_121019.html

2.2.4. Milk and dairy products labeling

Milk labeling is regulated under RTCA 67.04.65:12[7], which is based on the CODEX Standard Norm 206-199. The use of the word "milk" is prohibited on products that are not cow or animal milk derived products, except for coconut milk. If a milk product has been flavored or colored, it can still be called milk.

Pasteurized milk is regulated RTCA 67.04.66:12[8], and **UHT milk** under RTCA 67.04.73:17 [9]. These norms describe those types of milk that have gone through a pasteurization process and have been exposed to heat within the approved parameters. In addition, UHT milk must have been exposed to 135-145° for 2-4 minutes, in the different combinations that ensure the milk is safe for human consumption.

Table 1. Approved composition of milk either pasteurized or UHT

	Whole	Partly Skimmed	Skimmed
Fat content (%)	≥3.0	≥0.5 and 3	0.5
Protein (Nx6.38) (%)	≥3.0		
Non-fat dry milk extract	≥8.2		
Acidity, as lactic acid (%)	≥0.13 and ≤0.17		
Freezeing point (°C)	≤-0.53≤ -0,53°H		

Powdered milk and cream are regulated by RTCA 67.04.76:18[10]. Labels must specify whether it is a dehydrated milk or cream that might be reconstituted to its liquid form.

Table 2. Powder milk and cream composition Weight (%)

	Whole	Partly Skimmed	Skimmed	Powder/ cream
Grease	≥26 and <42	≥1,5 and <26	<1,5	≥42
Protein	≥34			
Moisture	≤5			

Creams and prepared creams are regulated by RTCA 67.04.71:14[11], which corresponds with CODEX standard norm 288-1976. For creams and sour cream to be named creams, they must have above 10% fat content and be derived exclusively from milk.

Table 3. Milk fat content

Type of cream	≥ Fat (% w/w)
Cream or custard	18
Whipped or whipping cream	28
Rich whipped or whipping cream	35
Extra rich whipped or whipping cream	45

[7] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/312-2013ANEXO%20II.pdf
[8] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/337-2014ANEXO.pdf
[9] http://web-sieca.s3.amazonaws.com/direccion-juridica/COMIECO/RESOLUCIONES/403-2018/ANEXO%20RES%20403-2018%20RTCA%20Leche%20UHT-final%20COMIECO.pdf
[10] http://web-sieca.s3.amazonaws.com/direccion-juridica/COMIECO/RESOLUCIONES/413-2019/ANEXO%20RES%20413-2019%20RTCA%2067.04.76.18%20Leche%20en%20Polvo.pdf
[11] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/363-2015ANEXO.pdf

The following are approved ingredients in cream and custard: non-fat milk solids (2% max), caseinate (0.1% max), powdered milk serum (1% max), food-safe cultured microorganisms (for fermented or acidified cream), milk-derived products originating from milk or serum (containing at least 35 % w/w of milk protein) which may be used as stabilizers or thickeners if they don´t exceed 2% content, starch and gelatin (only if added for stabilizing purposes). In addition, for the manufacturing of reconstituted or recombined cream, the use of butter, milk fat, powder milk or powder cream, and water are permitted.

Cheese labelling. Products labeled as cheese must be derived exclusively from milk. The term imitation cheese is not allowed. Cheese may be processed, non-cured (fresh), or cured (dry).

Non-cured cheese or fresh cheese are regulated under RTCA 67.04.72:17[12], based on CODEX standard norm 221-2001. Non-cured cheese is classified based on the fat content in the dry extract:

Table 4. Non-matured cheese names

Denomination / name	Fat content in the dry extract (%)
Extra fat double cream	≥ 60
Fat	≥45 and <60
Partially fat	≥25 and <45
Low fat	≥10 and <25
Skimmed	<10

Approved ingredients for non-cured cheese are the following: rennet or coagulant, acid lactic fermented bacteria culture and/or flavor or tasting modifiers, enzymes, water, condiments, spices, herbs, fruits, fresh or processed fruits or vegetables, and natural or artificial smokes, among others.

Cured cheese is regulated under RTCA 67.04.70:14[13], which corresponds partially to CODEX standard norm 283-1978. Cured cheese can be named according to its moisture content without fat (HSMG), which is calculated as the percentage of moisture over the total weight minus the fat. In these cheeses, the same ingredients listed above for the non-cured cheese are also allowed, as well as sodium or calcium chloride.

Table 5. Cheese names according to its moisture content without fat

Denomination / name	Moisture without fat HSMG (%)
Extra hard	<51
Hard	≥49 and ≤0.56
Firm / Semi-firm	≥54 and ≤0.69
Soft	≥67

2.2.5. Alcohol labeling

The RTCA 67.01.05:11[14] regulates labelling of fermented alcoholic beverages and establishes the following specifications in addition to general labelling rules:

[12] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/396-2017ANEXO.pdf
[13] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/366-2015ANEXO.pdf
[14] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/332-2013ANEXO%20II.pdf

- The alcohol content must be specified in the International System, in % alcohol/volume or Gay Loussac (G.L.) measure.
- If the product has more than 10% alcohol content, it does not require an expiration date.
- If the product contains less than 10% alcoholic content or when it includes other ingredients such as eggs or another perishable, the expiration date must be displayed on the label.
- A list of ingredients is required if it has more than one ingredient and must also be listed in descending order of composition.
- The front panel must have the following health warning "El abuso de licor es nocivo para la salud" (Abuse of liquor is detrimental to your health)
- It can be considered light if it has 25% reduced energy from the same original product.

RTCA 67.01.06:11[15] establishes the following additional requirement for distilled alcoholic beverages: if aging is declared on the label, it must indicate complete full year aging only.

2.2.6. Fruit nectars

Labeling of fruit nectars is regulated by RTCA 67.04.48:08[16]. The minimum content of juice or pulp in fruit nectars is 25% (volume/volume) for all fruits, except for those whose acidity level cannot allow that percentage (minimum acidity allowed is 0.5% of the corresponding organic acid according to the fruit type). Litchi (Litchi chinensis Sonn) is the only exception to the rule and must have 20% juice or pulp content.

Other ingredients approved in fruit nectars are:

- Sugars: saccharose, glucose, dextrose, and fructose.
- Syrups: liquid saccharose, inverted sugar syrup, glucose or fructose syrup, high fructose content syrup, honey and/or fruit derived sugars.
- Essential Nutrients: vitamins and minerals
- Lime and/or lemon juice may be added up to 5 g/L equivalent anhydrous citric acid.

The norm established the following specific requirements that are additional to general labelling rules:

- Name: the product must have the name of the nectar accompanied by the name of the fruit or fruits (from major to minor on a weight basis) and if the product includes more than three fruits, it can be called a "mix", but all the fruits have to be listed in the ingredients' declaration.
- Pasteurized nectars can be labeled as such.
- The fruit variety may be named in the front panel if the common name accompanies it.
- The fruit content must be labeled as a percentage (volume/volume) of the fruit.

2.2.7. Oils and fats

The specifications and labeling for oil and fats are governed by RTCA 67.04.40:07[17], which corresponds to CODEX standard norms 19-1972 (rev.2 1999), 32-1981 (rev.1 1989) and 210 (rev.3 2005).

[15] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/332-2013ANEXO%20I.pdf
[16] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/226-2008ANEXO.pdf
[17] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/215%20-%202007ANEXO.pdf

The denomination of the oil or fat must be in accordance with its fatty acid composition, based on gas chromatography. The following ingredients can be added to margarines and emulsified greases: Milk, dairy solids, or mixtures; vitamins (A, D, E, and others); salt (sodium chloride), potassium chloride for low sodium margarines (or without sodium) or a mix of the salts; sugars; edible proteins; spices and condiments; permitted additives.

For oils or margarines with added ingredients, the name of the secondary ingredient must be displayed in the label. In addition:

- When the margarine has 80% fat, it is denominated "margarine".
- When it has less than 80% of fat/oil, it may be denominated "margarine" if the content fat/oil is spelled out.
- When it has 25% less fat content than its original, it can be called "light".
- It can be labeled as "cholesterol-free" if "0% cholesterol" is shown in the nutritional label (less than 2 mg/portion of at least 14 grams; the same rule applies for trans-fats, if less than 0.5 g/portion of at least 14 grams).

2.3. Packaging requirements

There are no special requirements for packaging or container size. Containers can be of plastic, metal, glass, cardboard, or any other materials which comply with requirements to maintain the quality and safety of the product. The amount of product in pre-packed foods is regulated by the following regulation: RTCA 01.01.11:06.[18]

Bulk-packed food products do not require labeling, unless they are to be sold at the retail level as individual units. Shelf-life requirements specify that the "use-by" date must be printed on the package.

2.4. Food additives

In December 2019 the Central American countries agreed to modify RTCA 64.04.54:10[19] and replace it with RTCA 67.04.54:18[20], which is as its predecessor, a partial adoption of the current version of CODEX standard norm 192-1995. According to Council of Ministers for Economic Integration (COMIECO for its Spanish acronym) Resolution 419-2019, the new RTCA on food additives entered into force on June 5, 2020. The additive regulation allows the use of flavors and aromas of aromatic substances or mixtures of substances, obtained from physical or chemical processes of isolation, or natural forms of synthesis, accepted by any of the following internationally recognized entities: JECFA (Joint FAO/WHO Expert Committee on Food Additives), FEMA (Flavor Extract Manufacturers Association), the European Union and the US Food and Drug Administration (FDA). The list of additives included in the CODEX standard norm 192-1995 will be automatically updated according to the revisions approved by the CODEX Alimentarius Commission (CAC).

The norm provides a positive list, which specifies tolerances of approved additives by food category and intended use. The list in Annex A of the RTCA applies to additives with references different from those of CODEX STAN 192-1995 The regulation created a Central American Food Additive Commission in charge of updating the lists of additives included in the regulation.

[18] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/168-2006ANEXO.pdf
[19] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/283-2012ANEXO.pdf
[20] http://web-sieca.s3.amazonaws.com/direccion-juridica/COMIECO/RESOLUCIONES/419-2019/ANEXO%20RES%20419-2019%20RTCA%20ADITIVOS%20VERSION%20FINAL%20-Firma%20COMIECO.pdf

The approval of additional additives may take a considerable length of time, since a harmonized procedure is followed, and all Central American countries need to approve the request.

When a product contains preservatives, coloring, emulsifiers, and other type of food additives the label must specify the generic name or international code, purpose, and concentration of each.

Common ingredients and adjuvants are exempt from the additives list. Food additives are not allowed in infant food or food intended for infants.

2.5. Other specific requirements

Products labeled as "diet supplements", "homeopathic", and "prophylactic" or "phyto-therapeutic" must be registered as drugs.

Bulk packed or institutional-sized products are required to visibly display the contents and ingredients on either the outside of the container or on individual items.

Vitamin enrichment: When a product contains enriched nutritious substances such as vitamins, mineral salts, and proteins the label should read: "Enriched Food Product" or "Enriched Artificial Food Product," whichever the case may be. The label should also specify the name and the content per serving or consumption unit.

RTCA 67.01.32:06[21] regulates import requirements for tasting and exhibition purposes for processed food or packed food products. A form for submitting the application for importing samples is provided in the regulation. Labeling requirements for samples are identical to those listed in the previous sections. However, local authorities might be a bit lenient due to the small quantities imported.

3. Additional country-specific requirements

3.1. Labeling of raw, ground, marinated and tenderized beef and pork in Costa Rica

Technical Regulation RTCR 400:2006[22] regulates labeling of raw, ground, marinated, and tenderized beef and pork, and requires the following information on the product label:

- Name and number of the processing establishment.
- Name and species of the cut. Ground meat is exempt from indicating the type of cut.
- Indicate if the meat is ground, marinated, seasoned, or tenderized.
- Indicate the type of viscera.
- Date of packing and expiration date.
- Conservation instructions.
- List of ingredients, listing them in descending order by mass, at the time of production. This list shall be headed with the title "Ingredients". The list must state added water in percentage terms.

[21] http://web-sieca.s3.amazonaws.com/actos%20administrativos/resoluciones/comieco/176-2006ANEXO%203.pdf

[22] http://www.pgrweb.go.cr/scij/Busqueda/Normativa/Normas/nrm_texto_completo.aspx?nValor1=1&nValor2=60086

- Fat percentage for ground meat. If there is a mixture of different lots of ground meat, the expiration date should be indicated taking into consideration the date of the oldest lot.
- Production code, lot, or shipping number, which allows product traceability. The codes must be legible, indelible, and resistant to moisture.
- Country of origin.

3.2. Labeling of alcohol in El Salvador

When alcoholic beverages are imported the label must read: "The excessive consumption of this product is harmful and creates addiction. Sales to consumers under the age of 18 are prohibited". This is based upon Article 26 of the Regulatory Law for the Production and Commercialization of Alcohol and Beverages[23]. In the case of tequila, the following information is also required: area of production, alcohol grade and manufacturing process.

3.3. Labeling of alcohol in Guatemala

Fiscal stamps for alcohol are required at a cost and must be affixed by the importer before release from Customs as proof of payment of taxes.

4. Panama

4.1. General requirements

According to Law 45, 2007[24], it is the responsibility of suppliers "to inform consumers in a clear and truthful manner, of the characteristics of products or services offered, such as their nature, composition, contents, weight, origin, date of expiration, toxicity, precautions, price and any other condition, all of which will be printed on the label of the container or on the shelves where products are offered to consumers."

Ministry of Health Decree 1195, 1992, refers to CODEX rules with regards to foods, additives, and packaging.[25] Accordingly labels must have basic information including:

- Manufacturer's name and address
- Expiration date
- List of ingredients
- Lot number
- The product form, e.g., powder, liquid, etc.
- Product registration
- Bar code

Law 113, 2019[26] establishes that labels must also indicate the country of origin.

Expiration date and country of origin of the product are the most important details to be included in labels of imported food products.

Despite several regulatory initiatives, national regulations do not require labels to be in the Spanish language, unless there is a specific ingredient in a food product that the Ministry of

[23] https://elsalvador.eregulations.org/media/19960640.pdf
[24] https://vlex.com.pa/vid/consumidor-defensa-competencia-disposicion-31616864
[25] http://www.aupsa.gob.pa/index.php/descarga/codex-etiquetado-alimentos-preenvasados/
[26] https://www.gacetaoficial.gob.pa/pdfTemp/28903_A/GacetaNo_28903a_20191118.pdf

Health through a Decree requires to be labeled in Spanish, such as medicines, agricultural chemicals, toxic products, and food products that require specific instructions or warnings due to human health risks.

For dietary products containing Aspartame or Acesulfame K, an individual label in Spanish must state that the product contains Phenylalanine, according to the Executive Decree No. 423 of June 12, 1993 and MINSA Resolution No. 11 of July 12, 1994.

4.2. Requirements for labelling of specific products

Dietary supplements and vitamins: if a label includes a statement that the product has any type of therapeutic or health improvement purpose, it needs a certified authorization from the Department of Pharmacy and Drugs of the Ministry of Health of Panama before it can be registered with the Panama Authority for Food Safety (Autoridad Panameña de Seguridad de Alimentos, AUPSA). All the documentation in English must be accompanied with a Spanish translation for the process at MINSA.

Baby food: Since April 2014, all baby food products, such as infant formula, complementary food (fruit and vegetable juices, puree), baby bottles, and pacifiers need to have additional stickers over the product labels in Spanish and uppercase font that states, "Mother's milk is the best food for infants."

Alcohol. If the product has less than 10% of alcohol content, it must include information for storage or preservation and expiration date. In addition, fiscal stamps -at no cost- are required for all liquors and must be affixed by the importer.

Sugary beverages: Panama´s Law 114, 2019[27], which establishes a new selective consumption tax on sugary beverages of 7% for sodas and 5% for juices and other sugary beverages, also requires mandatory labeling in Spanish of nutritional facts and ingredients (article 13 of the law 114). The labeling in Spanish can be a sticker.

4.3. Packaging and Container Regulations

Panama requires that all products are packaged with "food grade materials". There are technical regulations issued for specific products, which has packaging materials requirements.

For bottled water there is a specific returnable plastic bottle regulation, MINSA Resolution No. 181, 2001

[27] https://www.bdo.com.pa/es-pa/articulos/publicaciones-destacadas/ley-no-114-del-18-de-noviembre-de-2019