



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR LATIN AMERICA AND THE CARIBBEAN
Twenty-third Session
Virtual
22-26 July 2024

**PROPOSED DRAFT ANNEX TO THE GENERAL STANDARD
FOR THE LABELLING OF PRE-PACKAGED FOODS:
GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING**

(Comments of Brazil)

The discussion of the proposed Guidelines on Precautionary Labelling of Food Allergens is currently in step 2 and is being discussed in the Electronic Working Group coordinated by Australia, United Kingdom and United States, with the advice of an FAO/WHO Expert Group on Food Allergen Risk Assessment. In addition, CCMAS is examining analytical methods for food allergens at the request of CCFL.

Brazil considers this to be an issue with many technical implications and would like to draw the attention of the Latin American and Caribbean region to this topic.

During CCFL's work on the guidelines on the use of precautionary allergen labelling, Brazil has raised concerns regarding the proposed approach of allowing allergen labelling reporting only if the unintended presence of allergens is above the action level based on the reference dose.

Brazil understands that this approach would not provide an adequate level of consumer health protection, as it does not address the needs of people with food allergies who have a higher sensitivity and may react to exposures below the reference dose. Consequently, it would leave these allergic consumers without crucial information to protect their health.

Other negative consequences of this approach include the lack of reference doses for all allergens, uncertainty regarding the widespread availability of appropriate analytical methods and sampling plans to test for allergens in food and on surfaces for each potential action level, the excessive burden it imposes on many food business operators, especially small-scale producers, and increased trade barriers due to the lack of harmonized action levels.

Therefore, Brazil recommends that CCLAC members participate in the ongoing discussions at the CCFL on the development of guidelines for precautionary allergen labelling and consider other options that provide a higher level of protection for consumers with food allergies.

In addition, Brazil also suggests that CCLAC countries support the position that this work should not move forward until the CCMAS completes its work on allergen analysis methods and the sampling plan.