

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 8

FL/46 CRD26

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-sixth Session

Virtual

27 September - October 1 and 7, 2021

Comments from Malaysia

Agenda Item 8 - Food Allergen Labelling

AGENDA ITEM 8	CX/FL 21/46/8 CX/FL 21/46/8-Add.1 CX/FL 21/46/8-Add.2 CL 2021/21/OCS-FL
Food allergen labelling A) Proposed draft revision to the GSLPF – Provisions relevant to allergen labelling B) Proposed draft Guidance on Precautionary Allergen Labelling (PAL) comments	

Malaysia's Position

Malaysia is of the view, there is some section can be improved and suggested some amendment to the proposed text.

A) Proposed Draft Revision of the *GSLPF* (CXS 1-1985) Relevant to Allergen Labelling

Referring to CX/FL 21/46/8, Appendix II

1. Section 8.3.1

Malaysia is of the view the word “*from surrounding text*” is confusing, not clear and may lead to misleading interpretation. The proposed amendment are as follows:

“8.3.1 The foods and ingredients listed in section 4.2.1.4 shall be declared so as to contrast distinctly ~~from surrounding text~~ **of other ingredient in the ingredient list** such as through the use of font type, style or colour.”

2. Section 8.3.1.1

Malaysia proposes to delete Section 8.3.1.1 as *this section is repeating with Section 8.3.1.*

~~8.3.1.1 The font type, style and a minimum font size as well as the use of upper and lower case letters should be considered by competent authorities to ensure legibility of declarations about foods and ingredients known to cause hypersensitivity.~~

B) PROPOSED DRAFT GUIDELINES FOR THE USE OF [PRECAUTIONARY ALLERGEN OR ADVISORY LABELLING]

Referring to CX/FL 21/46/8; Appendix III.

1. Title of the document

Malaysia prefer the term “Precautionary Allergen Labelling”. Malaysia is of a view the term “Advisory” may convey a different understanding in its meaning as “recommended but not compulsory”.

2. Section 2.2

Malaysia is of the view that scope at para 2.2 shall be aligned with the definition of *Allergen Cross Contact* as stated in Section 3 where this definition is adopted from *Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020)*. Therefore, Malaysia would like to propose to amend the text in para 2.2 for consistency of the proposed draft as below:

*2.2 The Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) provides guidance on effective management practices and controls to prevent or minimise **unintentional presence of allergens in food due to cross-contact.** ~~the potential for allergen cross-contact.~~*

3. Section 3: Definition for *Precautionary allergen or advisory labelling*

Malaysia is of the view that the definition of precautionary allergen labelling should be clear, concise but thorough, and not limiting the allergen management process throughout the supply chain. Therefore, Malaysia would like to propose to revise the definition of preventive allergen labelling as follows:

*[Precautionary allergen ~~or advisory~~ labelling] is a statement indicating the allergen(s) that may be **unintentional** present in a food due to allergen cross-contact during **processes such as production, manufacture, transport and storage of food.** ~~the production, manufacture and transport of food, which may occur despite implementing allergen management practices and controls such as in the Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020).~~*