

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 CRD27

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 Jamaica

Agenda Item 8

Allergen Labelling

Jamaica supports the emphasizing of ingredients causing hypersensitivity and allergenic reactions directly in the ingredient list as per point 8.3.1. However, we do not recommend any additional statement in close proximity of the ingredient list as referred in point 8.3.2 **"In addition to the list of ingredients, the foods and ingredients listed in section 4.2.1.4 may be declared in a separate statement and placed in close proximity to the list of ingredients"** as this might be a source of error by duplicating the information. Since this is food safety information, the usage of "close proximity" is not clear enough and could be overlooked by the consumers.

We also agree with the proposed definitions as they exist in the proposed draft in Appendix 1 of the CL 2021/9/OCS-FL. We also support the definition of "Allergen" in the proposed draft revision, as it is already defined in the **"CXC 80-2020: Code of Practice on Food Allergen Management for Food Business Operators"**. Regarding 'hypersensitivity', 'food allergy' and 'food intolerance', we do agree with the proposed definition as they are consistent with EFSA Scientific opinion on the "Evaluation of Allergenic Foods Ingredients for Labelling purposes 2014". As soon as scientific advice will be provided by FAO/WHO, CCFL can give further consideration to the following definitions: 'hypersensitivity', 'food allergy' and 'food intolerance'.

Jamaica also supports transparent consumer communication and therefore, also support the amendment of section 4.2.1.3 of the GSLPF. Scientific data should also be provided to support any claims that compound ingredients less than 5% would not cause hypersensitivity. Section 4.2.1.3 should include a section that states the food "may contain.....". The rationale is that consumers have different levels of sensitivity and some are very sensitive to even the minutest of proportions of the foods mentioned in section 4.2.1.4.

Sections 4.2.14 and 4.2.3.1 should be consistent and provide both the name of the ingredient and the class name. However, discussions are still ongoing related to Section 3.4 of Appendix 1, about whether the class name should ensure the source of ingredient is clearly identified (e.g. starch derived from

wheat, caseinates from milk), or if the class name is understood to be derived from an allergen then the allergen need not be declared as “caseinates from milk” or whether the name of the allergen should be declared in all instances where a class name is used. As such, the amendment to section 4.2.3.1 should not be finalized unless the committee has reached a decision on section 4.2.1.5 (“4.2.1.5 Declaration of the foods and ingredients listed in section 4.2.1.4 shall be made using common and well understood terms for the source of the food and ingredient as part of, or in conjunction with, the relevant ingredientname.”).