

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5.2

FL/48 CRD07

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Québec City, Québec, Canada

27 October - 01 November, 2024

## GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING

(Comments from Kenya, Republic of Korea, United Republic of Tanzania)

### Kenya

#### Issue 1: Purpose

**Comment:** Kenya supports the improved text by EWG which includes coeliac disease as part of PAL guidance.

**Rationale:** Inclusion of coeliac disease as part of PAL will provide necessary information to people who react to glutes to make informed decision about the product.

#### Issue 2: Principle 4.2 regarding proposed alternative text on the types of risk assessment.

**Comment:** Kenya supports the EWG group proposal of principle 4.2 where risk assessment should be conducted as part of the decision to use PAL whether it is qualitative or quantitative.

#### Issue 3: Principle 4.3 and the table of reference doses in 4.3.1 particularly in relation to inclusion of gluten.

**Comment:** Kenya support principle 4.3 including the table noting that the values indicated considered Part 5 of FAO/WHO experts report on food allergens.

### Republic of Korea

The Republic of Korea proposes the following suggestion for '1. purpose' and 'principle 4.2.1.7' in "PROPOSED DRAFT ANNEX TO THE GSLPF: GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING."

'1. purpose'

We Suggested that 'Coeliac disease' be excluded from the purpose of the guideline

(Rationale) 'Coeliac disease' is an immune-mediated disease distinct from "food allergen," and 'allergen' and 'coeliac disease' are also distinguished in the GSLPF. Furthermore, this guideline does not establish a reference dose of gluten that could serve as a basis for the use of PAL(Precautionary allergen labelling).

'principle 4.2.1.7'

In accordance with Korean regulations, food business operators are required to indicate Precautionary Allergen Labeling (PAL) if there is a risk of unintended presence of food allergens due to cross-contact during the manufacturing process which encompasses all aspects of manufacturing, including the actions of workers, the use of equipment, manufacturing lines, and the storage of ingredients.

In light of regulations in countries with similar practices to those of Korea, we propose that the exemption from labeling be considered in the guidelines when the presence of unintended allergens can be reduced to at or below the 'action level.'

### United Republic of Tanzania

- i) The URT supports the advancement of the Annex to the GSLPF – Guidelines on the use of precautionary allergen labelling (Appendix II) to Step 5.

**ii) Advice to CCHF:**

The URT recommends that CCFH should have to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) and the Annex to the GSLPF, and request CCFH consider providing guidance on UAP risk assessment.

**Justification**

The work done by the CCHF on the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) is important in protecting consumers, but there are issues concerning allergens that are not similar to those discussed by CCFL in Appendix III something which might confuse the users of the two texts.