

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5.1

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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

REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING (STEP 7)

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

Kenya

Issue 1: Definition of food allergy

Comment: The outstanding issue relating to the use of the terms: ‘food’, ‘ingredients’, ‘food additives’ and ‘processing aids’ in both options as drafted should be guided by existing definitions in CXS 1-1995. This standard defines the terms food, food additives, ingredients and processing aids different only that food additives are included in the definition of ingredients. As a result, the definition should contain ‘food, ingredients and processing aids in its structuring to read:

“Food Allergen” means a food, ingredients and processing aids that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, usually caused by a protein or protein derivative in the food”

Issue 2: Section 4.2.1.6 - on exemptions in relation to the scientific advice and proposed alternate text

Comment: Kenya supports the proposed text including the foot note

Rationale: The food note which is referring to the 3rd report of FAO/WHO experts report of food allergy, provides a primary acceptable scientific basis for exempting any food. Ingredient or processing aid. Any other criteria should be secondary to what is published by FAO/WHO.

Issue 3: Section 4.2.1.7 – on sulphite and proposed revised text which includes the option of ‘food as offered to the consumer’ and ‘food as consumed’

Comment: The expression of sulphite affects consumers and manufacturers in different ways. While it may be assumed that consumers will constitute the product as directed, this may not be the case and hence to such group of consumers expression as offered will protect them. Expression as product is offered transfers liability to consumers. Therefore in consumer’s perspective expression as offered is preferred while for manufacturers as consumed will be preferred.

Issue 4: Section 8.3 – on declaration of certain foods and ingredients and specifically the proposed revised text for sections 8.3.1, 8.3.2 and 8.3.2.1.

Comment: Kenya supports the proposed text

Republic of Korea

The Republic of Korea proposes the following suggestion for Principle 4.2.1.7 in the “PROPOSED DRAFT REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985) RELEVANT TO ALLERGEN LABELLING ”.

We Suggest using the phrase “in a food [as offered to consumers]” instead of “in a food [as consumed]”.

(Rationale): It is challenging to verify the content “in a food [as consumed]” because the concentration of sulphite(sulfur dioxide) in food at the time of consumption may be influenced by various external factors.

The United Republic of Tanzania

- (i) URT support the following definition of the food allergen: “Food allergen” means a food or ingredient [or substance or processing aid] including a food additive or processing aid usually containing a protein or protein derivative, that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals”
- (ii) URT support the advancement of the revision to the GSLPF (Appendix II) to step 8 after considering the recommendation in (i) above
- (iii) The URT recommends that the CCFH should ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) with the proposed draft revision to avoid any contradiction in the codex texts.