

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

E

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

Agenda Item 5

FL48/CRD40

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Quebec City, Canada

27 October – 1 November 2024

Comments by Association of European Coeliac Societies (AOECS)

AOECS supports the recommendation of the VWG (FL/48 CRD02) to consider including a placeholder in the text for gluten and requesting the FAO/WHO expert consultation provide advice on a potential reference dose or concentration for gluten.

Proposal placeholder

As placeholder text we propose “PAL for gluten shall only be used if unintended gluten presence cannot be mitigated to a level at or below the threshold defined in CXS 118-1979 being 20 mg gluten per kg product as offered to the consumer.”

Rationale

We like to stress that IgE mediated allergy and coeliac disease are conditions that have a different immunological pathway and different basis for evaluation (RfD for wheat vs concentration for gluten) hence gluten and wheat are to be addressed separately in PAL regulations. There is a need to highlight that these are two clear and distinct approaches with different requirements.

For gluten there is since long a well-defined threshold of 20 mg/kg as stated in Codex Standard CXS 118-1979.

The distinction makes education of both consumers and FBOs vital. Obviously we are more than willing to take up that responsibility when it comes to consumers.

Expert consultation

We call for the FAO and WHO to include experts on coeliac disease and gluten in their consultation, as well as coeliac patient organisations, since the vast expertise of coeliac consumers is not to be underestimated.