



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

Quebec City, Canada

27 October – 1 November 2024

Comments by the International Union of Food Science Technology (IUFoST)¹

AGENDA ITEM 5.1: Proposed draft revision to the General Standard for the Labelling of Prepackaged Foods – Provisions relevant to Allergen Labelling (at Step 7) - FL CX/FL 24/48/5 - (PART A)

<p>Agenda Item 5.1</p> <p><i>Document: CX/FL 24/48/5- PART A</i></p>
<p>Proposed draft revision to the General Standard for the Labelling of Prepackaged Foods – Provisions relevant to Allergen Labelling (at Step 7)</p>
<p>IUFoST would like to thank the Electronic Working Group (EWG) chaired by Australia and co-chaired by the United States and the United Kingdom for the progress achieved and offers the following comments:</p> <p>IUFoST supports the second option of the definition of “Food Allergen” stating: “Food Allergen” “means food (including ingredients, food additives 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.”</p> <p>While both proposed definitions are all encompassing of the ingredients and components (additives and processing aids) that may include sources of priority allergens, and both have a clear mention of the protein nature of the food, being the cause of the allergic reaction, the second option of the definition uses wording that is more explicit and precise.</p> <p>Exemptions: A dedicated provision in the text (4.2.1.6) was added to identify situations where exemptions from declaration of priority allergens in the list of ingredients would be possible. IUFoST supports this section to refer to the report stemming from the FAO/WHO scientific advice on food allergens related to “Establishing exemptions from mandatory declaration for priority allergens” and specifically to the decision tree developed in this context, rather than listing in the text a list of specific exemptions.</p> <p>Declaration of Sulphites: IUFoST supports the provision of declaration of sulphites based on the 10 ppm action level to be applied on sulfites measured as “sulfur dioxide” as sold. This approach is more easily applicable by food industry and enforceable by food regulators. It would also be more protective of consumers as dilutions resulting from food preparation and consumption may result in lower levels of exposure to sulphites.</p> <p>Approaches of Allergen Declaration on Food Labels: IUFoST supports efforts to make allergen labelling accessible and legible. As such, IUFoST supports the use of a <u>separate statement</u> for the declaration of priority allergens, starting with “Contains”. However, it would be recommended that this statement if preferred to the declaration in the list of ingredients, be complete for all sources of priority allergens, when used. This approach will ensure that consumers would not have to read the presence of food allergens at two separate locations on the food label: the list of ingredients and the “contains” statement.</p> <p>The proposed provisions for the method of declaration may be simplified to insist on the principles to be pursued: Legibility and accessibility to consumers of the allergen information. National regulators would be left to choose the approach that is most suited to achieve these objectives, based on consumers’</p>

¹ This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GFoRSS), the Disciplinary Group for of the International Union of Food Science and Technology (IUFoST).

understanding of the information provided on food labels, which may differ from one country/region to the other.

AGENDA ITEM 5.2: GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING (STEP 4) - CX/FL24/48/5 ADD. 1 (PART B)

Agenda Item 5.2

Document: CX/FL 24/48/5 - Part B

Proposed draft revision to the General Standard for the Labelling of Prepackaged Foods – Proposed draft Guidance on Precautionary Allergen Labelling (PAL) (at Step 4)

IUFoST would like to thank the EWG chaired by Australia and co-chaired by the United States and the United Kingdom for the progress achieved to date.

IUFoST would like to offer the following comments:

Principle 4.1 – identifies the **conditions of resorting** to PAL as the result of a risk assessment and the inability to rule out the risks from Unintended Allergen Presence (UAP). However, this principle does not include the notion of “mandatory use” of PAL, when such finding is made, in a similar manner to the presence of allergens added deliberately to a food – It is therefore suggested to add a sentence at the end of principle 4.1 to convey the mandatory nature of resorting to PAL, when a risk cannot be ruled out. A proposed wording may be: “PAL should be mandatory under these circumstances”.

The use of PAL is conditioned by the reliance upon a risk assessment, which may be either **qualitative** or **quantitative** – such clarification (to ensure that the notion of risk assessment is understood not to necessarily convey the need to develop a quantitative risk assessment), may need to be fully explicated.

The Guideline includes the use of **proposed thresholds** for the priority allergens, as developed by the FAO/WHO expert consultation and based on the protection of 95% of food allergic consumers. These thresholds are recommended for use by those tasked to conduct the risk assessment. It may **be advised** to leave more discretion to “national / regional regulators” such that they develop/adopt thresholds based on their acceptable level of protection. The proposed levels would offer an example of reference for such thresholds.

In the context of determining whether a PAL is needed, guidance may be required on how food manufacturers should conduct allergen risk assessments – such guidance could be further developed by CCFH, using practices developed in Australia ([VITAL Tool](#): Voluntary Incidental Trace Allergen Labelling) and in Canada ([Allergen Management Guidelines for Food Manufacturers](#) – Food Allergy Canada / Laval University)

IUFoST supports consistency in the way PAL should be declared on food labels with the use of a simple statement such as (“may contain”).