

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

(Comments from Japan)

Agenda Item 5.1: Revision to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985): Provisions relevant to allergen labelling

As for the table of Section 4.2.1.4, Japan proposes that the specified name “fish” be changed to “‘fish’ or the name of the fish”, and the specified name “crustacea” be changed to “‘crustacea’ or the name of crustacea”.

As for “fish and products thereof”, there are some countries/areas where the specific names of fish, mackerel for example, are known as allergenic foods, while “fish” is not deemed allergenic food. For example, in Japan, someone who is sensitive to mackerel enjoys eating salmon. It seems reasonable when referring the description of CHAPTER 6 of PART 2 report of the joint expert consultation, 6.4 FISH, which says “These data support the view that some fish-allergic individuals may tolerate fish from taxonomically distinct orders while reacting to selected species”.

As for “Crustacea and products thereof” as well, there are some countries/areas where the specific names of crustacea, for example shrimp, are known as allergenic food, while “crustacea” is not deemed allergenic food. For example, in Japan, “shrimp” and “crab” are well known ingredient name, but “crustacea” is seldom used as an ingredient name, and someone who is sensitive to shrimp enjoys eating crab, vice versa.

It also seems reasonable when referring the description of CHAPTER 6 of PART 2 report of the joint expert committee, 6.5 CRUSTACEA, which says “A major data gap exists as to whether a threshold dose for shrimp can be extended to other crustaceans such as crab or lobster”.

We consider this point very important, because if the specified names to be declared as allergen are limited to only “fish/crustacea”, it would unnecessarily narrow the chances for allergen patients to enjoy wide variety of foods.

We consider that this is the part where some flexibility for competent authorities is necessary so that they can decide their policy based on the situation in each country such as consumers’ recognition, consumers’ demand, the current practice of FBOs, and so on. For example, in Japan, “crustacea” is not a familiar word compared with “shrimp” or “crab” in daily life. It is very likely that some consumers might not understand “crustacea” while they understand “shrimp” or “crab”. In addition, for example in Japan, it is specific species of fish/crustacea that consumers recognize as allergens, not “fish” or “crustacea” in general. For such consumers, allergen declaration as “fish” or “crustacea” is just inconvenient and might not be readily recognizable. We understand that such consumer recognition would vary among countries, so we are proposing to secure some flexibility for competent authorities so that they can adopt appropriate policy considering each country’s situation.

In conclusion, Japan considers that the specified name “ ‘fish’ ” should be changed to “ ‘fish’ or the name of the fish” and that the specified name for “crustacea” be changed to “ ‘crustacea’ or the name of the crustacea”.