

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 15

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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 Burundi)

AGENDA ITEM 4: CONSIDERATION OF LABELLING PROVISIONS IN CODEX STANDARDS (ENDORSEMENT) CX/FL 24/48/4

a) Codex Committee on Spices and Culinary Herbs (CCSCH)

1. Draft standard for dried floral parts - dried saffron
2. Draft standard for dried or dehydrated roots, rhizomes and bulbs - turmeric

Position: Burundi supports the inclusion of the country of harvest and proposes that this inclusion not be mandatory but optional.

Rationale: The country of origin clearly addresses the origin of products and allowing mandatory inclusion of the country of harvest may open doors for similar requests for other products without adding any value to the labelling. Therefore, no justification in terms of safety for the country of harvest to be mandatory, and to justify how the use of the country of harvest would address the issue of fraud seems to be not convincing.

b) Standard for fish oils CXS 329-2017

Issue: Endorse the statement: "7.3 Other labelling requirements for calanus oil (Section 2.1.6), the maximum intake level of astaxanthin shall be declared if required by the country of retail sale in accordance with the acceptable daily intake established for different age groups by competent authorities"

Position: Burundi supports the endorsement of the proposed text for inclusion in CXS 329-2017.

Rationale: The statement provides flexibility of application of labelling requirements for the contaminant where ADI has been established and supports the progression of the standard.

c) Regional standard for castillalulo (Naranjilla)

Comment: Burundi has no objection in endorsing the labelling provision for this regional standard. However, it will be necessary if clarification on the value intended by addition of the requirement on district/ regional / local place name where the product is grown as part of the origin of the produce is given.

Rationale: CXS 1-1985 which is the reference standard for labelling of products only requires a country of origin without necessarily indicating further details as required by this regional standard.

AGENDA ITEM 5.1: REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING (STEP 7) - COMMENTS IN REPLY TO CL 2024/53 - FL CX/FL 24/48/5 ADD. 1 (PART A)

Issue 1: Definition of food allergy

Position: Burundi supports the adoption of the second option text with slight editorial amendment.

*"Food Allergen" means a food ~~or (including~~ ingredients, **including** 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".*

Rationale: The improvement of text is to ensure that both food and ingredients, which independently may be a source of allergen, are considered in the definition.

Issue 2: Section 4.2.1.4 and 4.2.1.5 – Scientific names for tree nuts

Position: Burundi supports the scientific names as provided in Section 4.2.1.4 and 4.2.1.5

Rationale: The names accommodate all species of the tree nuts

Issue 3: Section 4.2.1.6 – Exemptions

Position: Burundi supports the use of the criteria for exemption established in FAO and WHO (2024) Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens rather than developing or adopting a list of exemption

Rationale: The FAO/WHO publication provides a scientific basis for determining criteria for exemption from mandatory listing.

Issue 4: Section 4.2.1.7 – Sulphite when present in concentrations of 10 mg/kg or more in a food [as offered to the consumer/as consumed] shall always be declared using the specified name 'sulphite' or 'sulfite' in addition to or as part of the ingredient name.

Position: Burundi supports deleting the square brackets and declaring sulphites as consumed.

Rationale: It is a challenge to be certain that consumers will prepare the products offered in strict adherence to the direction of use especially where reconstitution or dilution is required before consumption. As a result, a significant population may be exposed to the risk of exposure especially where the dilution/reconstitution is expected to reduce the concentration.

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

Issue 1: Purpose section to determine if and how PAL thresholds can address cross contact from gluten containing cereals for consumers with coeliac disease. The text below was proposed:

Purpose: To facilitate a consistent and harmonized approach to the effective use of Precautionary Allergen Labelling (PAL) for communicating to consumers with food allergy or coeliac disease about the risk from the unintended presence of allergens in food due to cross-contact.

Position: Burundi supports the amended proposed text.

Rationale: This is work in progress. The guidelines have taken all cereals containing gluten into account. How to determine the threshold could be a challenge in Africa as we do not have the capacity. The FAO Expert Committee reports have stated the thresholds based on science, therefore we support the proposed thresholds aligned to the reports available.

Issue 2: To consider principle 4.2 in regard to proposed alternative text on the types of risk assessment. The EWG discussed the text in square brackets []

Position: Burundi supports the text as agreed by the EWG.

Rationale: The use of PAL is understood to apply despite the effective use of allergen management being in place. Therefore to use PAL, Food Business Operators should ensure that risk assessment has been conducted to ensure exposure levels are below the reference doses. The type of risk assessment can be quantitative and/or qualitative. There is a need for regulatory authorities to ensure that all foodstuffs with or without PAL have undergone a risk assessment (FAO and WHO (2023): Risk assessment of food allergens – Part 3: Review and establish precautionary labelling in foods of the priority allergens (Sections 3.3.1 to 3.3.6) for priority allergenic foods.

Issue 3: To consider principle 4.3 and the table of reference doses in 4.3.1 particularly in relation to inclusion of gluten

Position: Burundi supports the reference doses as proposed in section 4.3.1.

Rationale: The established values are based on a strong scientific basis of ED05 reference doses as recommended by FAO/WHO experts committee and where risk management approach was used in establishing the values, consideration was made to ensure that consumers' safety was prioritised.

Issue 4: CCFL to consider whether the Annex to the GSLPF – Guidelines on the use of precautionary allergen labelling (Appendix II) is ready to advance to Step 5

Position: Burundi supports progression of the document.

Rationale: The EWG have addressed most of the areas of concern and taken into consideration the relevant reports of the Expert Committee.

Issue 5: Whether to provide further advice to CCFH to ensure consistency of the Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020) and the Annex to the GSLPF,

and request CCFH to consider providing guidance on UAP risk assessment.

Position: Burundi supports the proposed approach.

Rationale: The recommendation for CCFH to ensure consistency with the CoP/ Annex to GSLPF is to ensure alignment of Codex text for effective allergen management

AGENDA ITEM 6: PROPOSED DRAFT GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PRE-PACKAGED FOODS TO BE OFFERED VIA E-COMMERCE: (STEP 7) - CX/FL 24/48/6

Issue: Clause 5.1: Durability

Consensus on three (3) options of the wording provided:

Position: Burundi supports the modification as proposed in option A. The definition of durability may be moved to definition clause.

Rationale: It is important for consumers before they make final decision to procure an item to be aware of the durability of the product. This is especially important when the product is being imported into a country where other regulations related to the durability of the product may apply. It will also prevent dumping or buying of a lot of goods, especially where it is offered on a promotional basis with short expiry, hence expiring before use.

AGENDA ITEM 7: PROPOSED DRAFT GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING - CX/FL 24/48/7

Issue: Review the addition of [audible] in section 7.10 and the new provision on costs in section 7.12 to align with the work on e-commerce.

Position: Regarding clause 7.10 the text should be drafted such that audible should be provided optionally in addition to the requirement that information being clear, prominent and readily legible but not to replace such requirement, so as to read, 'Food information described or presented using technology shall be clear, prominent and readily legible [or and may be presented in audible] to the consumer under normal settings and conditions of use of the technological platform'

Rationale: The information presented about the use of technology should be to great extent possible be aligned with CXS 1-1995 regarding legibility and that any further forms should be to supplement and not to replace the legibility.

AGENDA ITEM 8: AMENDMENTS TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO JOINT PRESENTATION AND MULTIPACK FORMATS (STEP 4) – Comments in reply to CL 2024/56-FL - CX/FL 24/48/8-Add.1

Position: Burundi supports the proposed amendments to the GSLPF (CXS 1-1985) relevant to joint presentation and multipack formats and recommends advancement of the text in the step process.

Rationale: To provide for labelling of multipacks and joint packaging.

AGENDA ITEM 9: LABELLING OF ALCOHOLIC BEVERAGES - CX/FL 24/48/9

General comment: Burundi recognizes the negative impacts that alcohol has on health, the need to capacitate countries to develop national regulations on labelling of alcoholic beverages, and the international guidelines that exist for countries to use to develop their legislation. We look forward to the clarification on whether "alcohol" is food or a non-food item as the discussions progress.

AGENDA ITEM 10: APPLICATION OF FOOD LABELLING IN EMERGENCIES - CX/FL 24/48/10

Position: Burundi supports the initiation of work as proposed in the discussion papers.

Further, Burundi agrees with the proposal on withdrawal of the discussion paper on TFAs.

AGENDA ITEM 11: DISCUSSION PAPER ON TRANS FATTY ACIDS - CX/FL 24/48/11

Position: Burundi supports the initiation of work as proposed in the discussion papers.

Further, Burundi agrees with the proposal on withdrawal of the discussion paper on TFAs.

AGENDA ITEM 12: DISCUSSION PAPER ON SUSTAINABILITY LABELLING CLAIMS - CX/FL 24/48/12

Position: Burundi supports the initiation of work as proposed in the discussion papers.

Further, Burundi agrees with the proposal on withdrawal of the discussion paper on TFAs.

AGENDA ITEM 13: DISCUSSION PAPER ON THE ESTABLISHMENT OF A DEFINITION OF ADDED SUGARS - CX/FL 24/48/13

Position: Burundi supports the initiation of work as proposed in the discussion papers.

Further, Burundi agrees with the proposal on withdrawal of the discussion paper on TFAs.

AGENDA ITEM 15: APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL - Analysis of comments in reply to CL 2024/29-FL and amendment proposals - CX/FL 24/48/15

APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL - Analysis of comments in reply to CL 2024/29-FL and amendment proposals

General comment: Burundi supports the proposed criteria for evaluation and prioritization of work as indicated in Annex 1 of the discussion paper. It can be used on a trial basis to determine its appropriateness and relevance.