

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 5.1

CX/FL 24/48/5-Add.1 (Part A)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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

Comments in reply to CL 2024/53-FL (Part A)

Comments by Argentina, Australia, Brazil, Canada, Chile, Colombia, Costa Rica, Ecuador, Egypt, European Union, Guatemala, Honduras, India, Indonesia, Jamaica, Japan, New Zealand, Paraguay, Saudi Arabia, South Africa, Thailand, Uganda, United Kingdom, Uruguay, USA and Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB), Association Of European Coeliac Societies Codex and Regulatory Affairs, European Federation of Allergy and Airways Diseases Patients' Associations, FIVS, Food Industry Asia, FoodDrinkEurope, ICBA, ICGA, ICGMA, ICUMSA, IDF/FIL, International Association of Consumer Food Organizations, International Confectionery Association, International Special Dietary Food Industries, The European Federation of the Associations of Dietitians (EFAD)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/53-FL issued in August 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

3. Comments received on the Revision to the *General Standard for the Labelling of Pre-packaged Foods* (CXS 1-1985): Provisions relevant to allergen labelling (Step 7) have been included in CX/FL 24/48/5-Add.1 (Part A).

4. Comments received on the guidelines on the use of precautionary allergen labelling (PAL) have been included in CX/FL 24/48/5-Add.1 (Part B).

Annex I

GENERAL COMMENTS	MEMBER / OBSERVER
<p>Subject to CCFL discussions to resolve the outstanding matters, Australia supports progressing the proposed revisions to the GSLPF to Step 8.</p>	<p>Australia</p>
<p>Regarding the proposed definitions of 'food allergen,' Brazil understands that both definitions provide clarity and address the concerns raised by some delegations regarding food additives and processing aids. However, we prefer the second definition, as it aligns more closely with the definition of 'food' in the GSLPF, which already includes the term 'substance,' covering ingredients, food additives, and processing aids. Additionally, this definition clarifies that the labelling applies to the food allergen not the protein in the allergenic food.</p> <p>Brazil also agrees with the suggestion that once a final definition of food allergen is agreed by CCFL, this should be referred to CCFH for their consideration in relation to the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020).</p> <p>In relation to exemptions, Brazil supports the text in section 4.2.1.6. However, Brazil does not support including the 'currently accepted exemptions' from Annex 1 of the Expert Committee's Part 4 report as part of the list of exemptions in the GSLPF or as examples.</p> <p>As indicated in the Expert Committee's Part 4 report, the risk assessment of derivatives from allergens requires detailed characterization, protein analysis, and exposure assessment of the derivative. Brazil understands that currently there is no global standardization in the compositional characteristics, production methods, and intended use of most derivatives listed in the 'currently accepted exemptions' in Annex 1 of the Expert Committee's Part 4.</p> <p>This means that the same derivative can be produced by different methods, have varied protein content and allergenic profiles, be authorized for use under different conditions at the national level, and be consumed in different amounts considering the variability of eating habits in each country.</p> <p>It should be noted that most derivatives listed in the 'currently accepted exemptions' in Annex 1 of the Expert Committee's Part 4 do not have a standard in the Codex, and those that do have standards do not include criteria related to the maximum protein content. For example, the maximum protein content of soybean and peanut oils is not specified in the Standard for Named Vegetable Oils. Similarly, the JECFA specification for the additive lecithin does not specify the maximum protein content.</p> <p>Thus, Brazil believes that exemptions of derivatives from allergens from labelling should be based on a case-by-case risk assessment, based on the information presented by interested parties and conducted by national authorities, as provided in section 4.2.1.6 of the GSLPF.</p> <p>It should be emphasized that the Expert Committee clarified that the derivatives listed in the 'currently accepted exemptions' in Annex 1 of the Expert Committee's Part 4 are not meant to be recommendations or endorsements for the exemption of a derivative from required allergen labelling on a global basis.</p> <p>Regarding the declaration of sulphites, Brazil could support applying it either to food as offered to the consumer or as consumed, as required by national authorities.</p> <p>Brazil supports the proposed revision to sections 8.3.1, 8.3.2, and 8.3.2.1 as it provides clarity that legibility criteria apply to the specified names, ensures that consumers will have access to relevant health protection information, and provides flexibility to allow national authorities to determine the most appropriate approach for allergen declarations for their respective populations.</p>	<p>Brazil</p>

<p>Brazil believes that the few outstanding issues can be resolved within the virtual working group on allergen labelling and during the CCFL48 plenary. We are confident that the proposed guidelines will be ready for advancement to Step 8.</p>	
<p>(i) La revisión de la Norma general para el etiquetado de los alimentos preenvasados (NGEAP) que figura en el Apéndice II del documento CX/FL 24/48/5 (Parte A), en concreto sobre:</p> <p>a. La definición de "alérgeno alimentario": en el Apéndice II se presentan dos borradores de definiciones para su consideración por el CCFL.</p> <p>Respuesta:</p> <p>Chile considera que ambas definiciones cumplen con el objetivo de describir el concepto de alérgeno alimentario. Sin embargo, nuestra preferencia por la segunda versión se fundamenta en su capacidad para comunicar de manera más efectiva el alcance y la complejidad de los alérgenos alimentarios.</p> <p>b. La Sección 4.2.1.6: Exenciones en relación con el asesoramiento científico y el texto alternativo propuesto, y si proporcionar una lista de exenciones en la NGEAP (o en otro lugar), o bien hacer referencia, como ejemplos, a las "exenciones actualmente aceptadas".</p> <p>Respuesta:</p> <p>Chile apoya la sección 4.2.1.6. Sin embargo, creemos que podría ser necesaria una aclaración con respecto a los requisitos para establecer un historial de uso seguro, ya que estos generalmente incluyen datos de exposición en una población determinada. El informe del Comité podría discutirse para aclarar y estandarizar aún más la evaluación de riesgos de exenciones para alérgenos alimentarios.</p> <p>A pesar de que proporcionar una lista de exenciones podría facilitar la armonización global de la declaración de alérgenos, también puede introducir complejidades: éstas incluyen la selección de exenciones, las diferentes condiciones para estas exenciones en diferentes mercados, y la necesidad de actualizaciones y revisiones periódicas. Estas actualizaciones pueden llevar mucho tiempo y hacer que el estándar quede obsoleto rápidamente. Por lo tanto, se recomienda hacer referencia a las "exenciones actualmente aceptadas" en lugar de crear una lista positiva de exenciones en esta norma.</p> <p>c. La Sección 4.2.1.7: Sulfito y texto revisado propuesto que incluye la opción de "alimentos tal como se ofrecen al consumidor" y "alimentos tal como se consumen".</p> <p>Respuesta:</p> <p>Chile apoya firmemente el etiquetado de sulfito en los alimentos envasados, considerando esencial informar a los consumidores sobre la presencia de esta sustancia. Específicamente, respaldamos la opción de "alimentos tal como se ofrecen al consumidor" para asegurar que los consumidores estén debidamente informados antes de la compra. Además, consideramos que la inclusión de "alimentos tal como se ofrecen al consumidor" es coherente con las regulaciones establecidas en mercados como Australia y Nueva Zelanda, donde se refieren a "alimentos para la venta". Esta alineación no solo fortalece la coherencia internacional, sino que también promueve la seguridad alimentaria y la salud pública.</p> <p>Por otra parte, consideramos que el contenido de la nota al pie (8) es redundante y podría generar confusión. Por lo tanto, proponemos la siguiente modificación: "Sulfito medido como la concentración total de dióxido de azufre (SO₂) y en equivalentes de dióxido de azufre". Esta reformulación busca simplificar y clarificar la información para los consumidores.</p>	<p>Chile</p>

<p>d. La Sección 8.3: Declaración de determinados alimentos e ingredientes y, específicamente, el texto revisado propuesto para las secciones 8.3.1, 8.3.2 y 8.3.2.1.</p> <p>Respuesta:</p> <p>Chile apoya el texto revisado de las secciones 8.3.1, 8.3.2 y 8.3.2.1 ya que considera aporta claridad y permite flexibilidad.</p> <p>e. Si el texto está listo para avanzar al trámite 8.</p> <p>Respuesta:</p> <p>Una vez abordados los puntos planteados anteriormente, Chile considera que el texto estaría listo para avanzar a trámite 8</p>	
<p>(iii) Si proporcionar más asesoramiento al CCFH para garantizar la coherencia del Código de prácticas sobre la gestión de los alérgenos alimentarios por parte de los operadores de empresas de alimentos (CXC 80-2020) con la revisión de la NGEAP y las directrices para el uso del etiquetado precautorio de alérgenos.</p> <p>De acuerdo</p> <p>Se considera que ofrecer más asesoramiento al CCFH es adecuado con fines de coherencia entre la NGEAP, las directrices de etiquetado precautorio y el CXC 80-2020.</p>	Colombia
<p>Costa Rica desea agradecer a los copresidentes por el trabajo realizado. Respecto a la revisión de la Norma general para el etiquetado de los alimentos preenvasados (NGEAP), apoya su avance al trámite 8.</p> <p>Adicionalmente, Costa Rica considera fundamental mantener al CCFH informado sobre el progreso del trabajo en curso, con el fin de garantizar la coherencia entre los textos.</p>	Costa Rica
<p>El país considera que el texto del documento está listo para avanzar al trámite 8.</p>	Ecuador
<p>i) The European Union (EU) would like to thank Australia, the United Kingdom and the United States of America for the preparation of the document 'CX/FL 24/48/5 (Part A) – Proposed draft revisions to the General Standard for the Labelling of Pre-packaged Foods (GSLPF) (CXS 1-1985) relevant to allergen labelling.</p> <p>The EU would like to propose the following comments under the relevant sections to improve further the text. As regards the advice to Codex Committee on Food Hygiene (CCFH), the EU agrees that it would be timely at this stage to provide CCFH with advice again on the progress to better ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020), especially for what concerns the definition and the lists of allergens (priority and regional list) in the revised General Standard for the Labelling of Prepackaged Foods (GSLPF).</p> <p>Assuming agreement on the points still open for discussion at CCFL48, the EU considers that the text is ready for advancement to Step 8.</p>	European Union
<p>Guatemala indica que podría estar de acuerdo para que avance a paso 8, siempre y cuando se pueda analizar las observaciones emitidas en las secciones 4.2.1.6 y 4.2.1.7</p>	Guatemala
<p>Indonesia supports that the text is ready to advance in the step process.</p>	Indonesia
<p>Jamaica agrees to move to Step 8.</p>	Jamaica

<p>New Zealand would like to thank Australia and the USA for their work on the revised paper. New Zealand is comfortable with the majority of the proposed revision and agrees with the EWG chair that CCFL48 should focus on the 4 issues identified in order to progress the work. We have therefore only provided comments on these sections.</p> <p>e. whether the text is ready for advancement to Step 8.</p> <p>New Zealand could support advancement of this text to step 8 provided the comments outlined above are addressed, particularly those regarding 4.2.1.7 so that declaration of sulphites was agreed to be determined on 'as sold' basis.</p> <p>We look forward to discussing these remaining issues at the virtual working group and in the plenary of CCFL.</p>	<p>New Zealand</p>
<p>Saudi Arabia does not support the advancement of the text to Step 8 at this time. We believe that further revisions are needed to address the concerns and comments raised by Saudi Arabia to ensure that the text meets the necessary standards and effectively serves its intended purpose.</p> <p>Saudi Arabia supports the provision of further advice to CCFH to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) with the revision to the GSLPF and the guidelines on the use of PAL.</p> <p>Maintaining consistency across these critical documents is crucial for implementing robust allergen management strategies and protecting consumer health.</p>	<p>Saudi Arabia</p>
<p>(iii) whether to provide further advice to CCFH to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) with the revision to the GSLPF and the guidelines on the use of PAL.</p> <p>SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa agrees that it is necessary to provide further advice to CCFH to ensure consistency with the Code of Practice on Allergen Management for Food Business Operators with the revision to the GSLPF and the guidelines on the use of PAL (UAP risk assessment). <p>(e) whether the text is ready for advancement to Step 8.</p> <p>SA position:</p> <ul style="list-style-type: none"> • South Africa supports the progress of the draft guideline to step 6, taking note of the comments submitted for consideration. <p>Rationale:</p> <ul style="list-style-type: none"> • The draft revision contains appropriate requirements that will assist consumers to make safe food choices, and also increase harmonization and facilitate trade. 	<p>South Africa</p>
<p>Uganda supports that GSLPF (Appendix II) is ready to advance to Step 8</p> <p>Uganda supports for further advice to CCFH to ensure consistency between the Code of Practice (CXC 80-2020) and the GSLPF revisions, emphasizing scientific guidance, best practices, consumer safety, and collaboration. This approach will contribute to a more effective framework for allergen management and labelling in the food industry.</p>	<p>Uganda</p>
<p>The UK is content for the text on mandatory allergen labelling to be progressed to step 8.</p>	<p>United Kingdom</p>

<p>The UK is supportive of the purpose and the majority of the text within the PAL standard, however, we consider that the use of thresholds requires significant further work within the Allergen Labelling eWG prior to CCFL49.</p> <p>The UK would like to thank Australia as Chair, for leading on the revision of the provisions relevant to allergen labelling in the General Standard for the Labelling of Pre-packaged Foods and on the Guidelines on the Use of Precautionary Allergen Labelling.</p> <p>UK supports that CCFL provides further advice to CCFH to ensure consistency between the texts. The UK also believes further detail on the requirements of an allergen cross-contact risk assessment – including sampling frameworks – needs to be provided within the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020).</p>	
<p>Uruguay agradece la oportunidad de dar respuesta a la CL. Considera que puede pasar a trámite 8, y si el único límite para que esto suceda es el punto 4.2.1.6, Uruguay estaría dispuesto a flexibilizar su posición.</p>	Uruguay
<p>Regarding part A, the United States is pleased with the excellent progress made on the revision to the GSLPF provisions related to allergen labeling and believes that with productive discussion and minor adjustments made to the areas highlighted in our comments, this text will be ready to advance to step 8.</p>	USA
<p>ALAIAB apoya que el CCFL proporcione más asesoramiento al CCFH para garantizar la coherencia del Código de Prácticas sobre la Gestión de Alérgenos para los Operadores de Empresas Alimentarias (CXC 80-2020) con la revisión del GSLPF y las directrices sobre el uso de PAL.</p>	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
<p>FIA believes the text is ready to advance to Step 8 once 4.2.1.7 is resolved. We have reservations about the proposed revised text of 'food as offered to the consumer' or 'food as consumed' and proposes replacement with 'as sold' for alignment with the current GSLPF labelling requirement which focus on products as packaged. For consistency and alignment across all Codex text, FIA views that it is important that CCFH be updated on the allergen labelling and PAL discussion at CCFL. For the sake of timeliness, we suggest a discussion paper with a new project document be proposed at CCFH55.</p>	Food Industry Asia
<p>FoodDrinkEurope supports that CCFL provides further advice to CCFH to ensure consistency of the Code of Practice on Allergen Management for Food Business Operators (CXC 80-2020) with the revision to the GSLPF and the guidelines on the use of PAL.</p> <p>In our view the text is not ready for advancement to Step 8 given that there are still contentious points that require further consideration, ongoing debate in-Committee and other aspects that bear on this matter such as Part B text, CCFH activities, etc.</p>	FoodDrinkEurope
<p>Regarding Question i)e. Yes, ICBA considers that once points made below on sulphites are addressed, we believe the text would be ready to advance to step 8.</p>	ICBA
<p>ICGA would like to thank Australia, the United Kingdom and the United States of America, for the time they invested in animating the intersessional electronic working group, which led to this result. ICGA contributed to this exercise in the past.</p> <p>ICGA appreciates the opportunity to provide the following comments in response to this circular letter.</p> <p>- ICGA supports the general objectives of the proposed amendments to the General Standard on Labelling of Prepackaged Foods (GSLPF, CXS 1) on the various sections relating to food allergens, as well as the proposed new guidelines on precautionary allergen labelling (PAL).</p>	ICGA

<p>- ICGA suggests a couple of additional changes to the proposed texts, as presented in the detailed comments below, especially on the proposed paragraph on exemptions. ICGA believes that the proposed amendment would get a much further added value should the CCFL community agree on the general accepted evidence of such named exemptions as presented in the FAO/WHO expert consultation (not controversial).</p> <p>- ICGA has also several adjustment proposals to the PAL Guidelines.</p> <p>ICGA is looking forward discussing all its other proposals with the CCFL community during the pre-session Virtual Working Group and during the final discussions at the CCFL48 meeting, which will be likely based on some if not all the recommendations from the VWG.</p>	
<p>The texts as provided are ready for advancement.</p>	ICUMSA
<p>Regarding the revision to the GSLPF (Appendix I), given that we have reservations regarding section 4.2.1.7, IDF does not think this text is ready for advancement to Step 8.</p>	IDF/FIL
<p>Our members support any effort on behalf of CCFL to ensure consistency between these standards and CCFH's Code of Practice on Allergen Management for Food Business Operators. Any efforts to ensure consistency should be initiated after CCFL has completed its work on amendments to the GSLPF and Guidelines on the use of PAL. At which time, CCFL and CCFH could convene a working group to review the Code of Practice on Allergen Management for Food Business Operators for consistency.</p>	International Confectionery Association
<p>Comment on Whether the text is ready for advancement to Step 8.</p> <p>ISDI would like to thank again the Electronic Working Group for preparing this document. ISDI however feels few points need further discussion and consensus from all members, in particular:</p> <ul style="list-style-type: none"> •adding to the column headed "FOOD AND INGREDIENTS" in section 4.2.1.4, and where appropriate in section 4.2.1.5, the scientific names next to the plant allergens listed in the column headed "FOOD AND INGREDIENTS" – as this is already done for the different tree nuts, •adding the terms 'gluten' and 'tree nuts' to the column headed "SPECIFIED NAME" in section 4.2.1.4, and where appropriate in section 4.2.1.5, as specified names, while specifying that the use of these two terms is reserved to the sole purposes of the PAL, •clarifying the need for section 4.2.2 and adding a section relating to method analysis and sampling. <p>ISDI believes that the text would merit an additional round of discussion with all member countries to reach final consensus and therefore advises against the text be advanced to Step 8.</p>	International Special Dietary Food Industries
<p>ISDI supports CCFL in requesting CCFH to act as follows:</p> <p>Ensure consistency of CXC 80-2020 with the revised GSLPF and guidelines on the use of PAL. This shall ensure consistency of Codex texts.</p> <ul style="list-style-type: none"> · Consider providing guidance on UAP risk assessment. 	International Special Dietary Food Industries
<p>SPECIFIC COMMENTS</p>	MEMBER / OBSERVER
<p>2. DEFINITION OF TERMS</p>	

“Food allergy” means a reproducible adverse health effect arising from an immunoglobulin class E (IgE) antibody or non-IgE antibody immune-mediated response following oral exposure to a food.	
Egypt supports the second definition version for “Food Allergen” for more clarification.	Egypt
Could the Committee clarify which animal species are subject to allergen labelling when discussing ‘egg’ and therefore define the term ‘egg’? For example ‘Egg’ could refer to the egg from domesticated birds, so as to exclude eggs from for example, crocodiles or fish.	International Special Dietary Food Industries
Saudi Arabia supports the proposed definition of “Food Allergen” as outlined in Appendix I: “Food Allergen” refers to a 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.	Saudi Arabia
“Food allergy” Jamaica accepts the definition of food allergy	Jamaica
“Food allergy” “Food allergen” means a food or ingredient 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. “Food allergen” means a 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. New Zealand could support either of the two proposals put forward. We consider the definition of ‘food’ includes ingredients and substances and that given ‘additives’ and ‘processing aids’ are defined as “a substance...” both proposed definitions capture the same elements and intent.	New Zealand
“Food allergen” FIVS supports this definition of food allergen.	FIVS
“Food allergen” ICGMA could support the second alternate definition being proposed although content in both is the same and difference is editorial in nature.	ICGMA
“Food allergen” India supports this definition as it is more clear	India
“Food allergen” EFA prefers this first option, as it is simpler and more readable.	European Federation of Allergy and Airways Diseases Patients’ Associations
“Food allergen” SA position and rationale: <ul style="list-style-type: none"> • South Africa is of the opinion that the two definitions are repetitive. • A simplified definition of “Food Allergen” and a more comprehensive definition of “Food allergy” will benefit users understanding of the standards and ease of interpretation. Therefore, South Africa is suggesting the following amendments to the definitions of “food allergy” and “food allergen” : 	South Africa

<p>“Food allergy” means a reproducible adverse health effect arising in susceptible individuals, from an immunoglobulin class E (IgE) antibody or non-IgE antibody immune-mediated response following oral exposure to a food. Reactions are usually caused by a protein or protein derivative in the food.</p> <p>“Food Allergen” means a food (including ingredients, food additives and processing aids) that can elicit a food allergy as defined by this standard.</p>	
<p>“Food allergen” ALAIAB prefiere la primera versión de la definición porque es más clara.</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>“Food allergen” The UK is content with either draft definitions.</p>	<p>United Kingdom</p>
<p>“Food allergen” Australia supports the first definition of ‘food allergen’. We note this received majority EWG support and has clarified that food and ingredients includes food additives and processing aids.</p> <p>In regard to the proposed alternate definition (second option) we note food allergens are not ‘caused by a protein or protein derivative’, but are the protein or protein derivative itself which we consider is better captured in the first definition.</p>	<p>Australia</p>
<p>“Food allergen” Uganda observes that the two definitions of a food allergen differ only little. However, Uganda would be in favor of considering definition one because it is explicit and precise.</p>	<p>Uganda</p>
<p>“Food allergen” This comment applies to both sentences on Food Allergen in this section.</p> <p>While Canada could support either definition of food allergen, Canada prefers the 2nd draft definition for “food allergen” as we believe it is clearer and better structured, while conveying the same information.</p> <p>Canada notes that the wording “food or ingredient” in the first definition could give the impression that food and ingredient are different things when in fact all ingredients are foods. The second definition is more precise.</p>	<p>Canada</p>
<p>“Food allergen” ISDI agrees to both the proposed definitions of “food allergen” as they both adequately define what a food allergen is.</p>	<p>International Special Dietary Food Industries</p>
<p>“Food allergen” FoodDrinkEurope supports the first definition of "food allergen" provided in the text.</p>	<p>FoodDrinkEurope</p>
<p>“Food allergen” IDF is supportive of this definition of “food allergen” in order to avoid any potentially contentious and time-consuming debate as to whether the definition of “food” includes or does not include ingredients, food additives, and processing aids.</p>	<p>IDF/FIL</p>
<p>“Food allergen” Guatemala indica que está de acuerdo con la definición primera, siendo la siguiente: “Alérgeno alimentario” significa un alimento o ingrediente incluyendo un aditivo alimentario o un coadyuvante de procesamiento que generalmente contiene una proteína o un derivado de proteína, que puede provocar reacciones mediadas por IgE u otras reacciones inmunomediadas específicas en individuos susceptibles.</p>	<p>Guatemala</p>

<p>“Food allergen” Estimamos que la segunda opción es más clara y está alineada con la definición de alimento establecida en la norma general de etiquetado.</p> <p>Se considera que la segunda definición propuesta de “alérgeno alimentario” es más acertada y es coherente con el hecho de que los “aditivos alimentarios” y los “coadyuvantes de elaboración” no se describen como ingredientes según lo señalado en la Norma general para los aditivos alimentarios (CODEX STAN 192-1995)</p>	<p>Colombia</p>
<p>“Food Allergen” means a 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>“Food Allergen” means the substance(s) in an allergenic food, usually a food (including ingredients, protein or protein derivative, 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>The United States maintains its view that the definition of “food allergen” should be improved for clarity, and believes it would be beneficial to include an additional definition for “allergenic foods” which are the subject of much of the guidance in the revision to the GSLPF allergen labeling provisions. As such, the United States proposes the following definition for “allergenic foods” be included in the revision:</p> <p>Allergenic Foods: means a food (including ingredients, food additives and processing aids) that can elicit IgE-mediated or other specific immune-mediated reaction in susceptible individuals, usually caused by a protein or protein derivative in the food.</p> <p>With a definition for “allergenic foods” in view, the United States suggests the following edits to the proposed definition of “food allergen” for consistency and clarity:</p> <p>Food Allergen: means the substance(s) in an allergenic food, usually a protein or protein derivative, that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals.</p>	<p>USA</p>
<p>“Food Allergen” means a 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>IACFO expresses no preference regarding these two options, as both variants make clear that ingredients, processing aids, and food additives are all covered under the policy.</p>	<p>International Association of Consumer Food Organizations</p>
<p>“Food Allergen” means a food (including ingredients, such as food additives and additives; processing aids) aids residues) 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>ICGA did suggest in the past an alternative definition of food allergen which differed from the two above ones as it referred to a “substance, usually containing a protein or a protein derivative, present in a food and consumed in such quantities that it elicits...”.</p> <p>ICGA could simply note the new definition set in Option 2, as a possible compromise outcome of the discussion within the EWG and VWG.</p>	<p>ICGA</p>

<p>ICGA would also like to suggest an editorial amendment in the text in between brackets of Option 2 which could read: “(including ingredients, such as food additives; processing aids residues)”. Because as present, it may mislead the reader that processing aids are food ingredients as per food additives: this is not legally the case).</p>	
<p>This definition is preferable to the first because of the focus on the source and response to it.</p>	<p>ICUMSA</p>
<p>We support the amended text in the second option of food allergen to help clarify that within the GSLPF, the definition for ‘food’ already includes the term ‘substance’, which covers ingredients, food additives, and processing aids.</p>	<p>International Confectionery Association</p>
<p>The EU expresses its support for the proposed new definition of food allergen for the following reasons.</p> <p>First, the proposed definition clearly delineates what constitutes food in the context of food allergenicity, encompassing foods, ingredients, food additives, and processing aids.</p> <p>Secondly, the defining characteristic of a food allergen is its ability to elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, rather than merely containing protein. Therefore, this attribute should be prioritised in the definition. While it is true that, in most cases, the immune reaction is triggered by the protein component (and sometimes by glycoproteins), ongoing discussions suggest that other molecules may also play a role. Thus, the explanation regarding the protein component and its mechanism should follow this primary attribute.</p> <p>In summary, the proposed definition enhances clarity and aligns with the key characteristics of food allergens.</p>	<p>European Union</p>
<p>Thailand agrees to the new revised definition of food allergen for clarity.</p>	<p>Thailand</p>
<p>FIA supports the proposed alternative for increased clarity.</p>	<p>Food Industry Asia</p>
<p>“Food Allergen” means a food (including including ingredients, food additives and processing aids) 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>Indonesia supports the proposed revision of the second option of the ‘food allergen’ definition and proposes to open the square brackets as follows:</p> <p>“Food Allergen” means a 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>Indonesia</p>
<p>The second definition for “Food Allergen” (...) is proposed with a capital letter. If this proposal is accepted, we suggest that the capital letter of the word ‘allergen’ be changed to a lower case.</p>	<p>International Special Dietary Food Industries</p>
<p>AOECS has a slight preference for this option (option 2)</p>	<p>Association Of European Coeliac Societies Codex and Regulatory Affairs</p>

<p>We do not disagree that the definition of “food” would include ingredients, additives, and processing aids because “food” includes “any substance which has been used in the manufacture, preparation or treatment of “food”.</p> <p>Therefore, we are not opposed to this definition.</p> <p>However, if this definition is used then it should be modified to remove “a” before “food” in order for the bracketed text to make sense: “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>	IDF/FIL
<p>ICBA prefers the second definition version as it is clearer. However, we can support either definition.</p>	ICBA
<p>Paraguay: consideramos que la presente redacción es la mas completa y clara</p>	Paraguay
<p>EFAD supports this definition as it is more comprehensive and clear</p>	The European Federation of the Associations of Dietitians (EFAD)
<p>Por "alérgeno alimentario" se entiende un alimento o ingrediente (incluidos ingredientes, aditivos alimentarios y coadyuvantes tecnológicos) que puede provocar reacciones mediadas por IgE u otras reacciones inmunomediadas específicas en individuos susceptibles, generalmente causadas por una proteína o un derivado proteico <u>presente</u> en el alimento.</p> <p>Costa Rica respalda la segunda opción, sugiriendo un ajuste para garantizar la coherencia en la redacción del texto, especialmente porque en varias secciones se hace referencia a la "declaración de alimentos e ingredientes".</p>	Costa Rica
<p>Ambas propuestas son muy similares y conservan objetivamente el mismo significado, incluido el hecho de que ambas frases, tal como están, se aplican a un alérgeno alimentario y no directamente a la proteína del alimento alergénico. Asimismo, se podría optar por la segunda opción de definición.</p>	Argentina
<p>Uruguay considera esta definición mas adecuada.</p>	Uruguay
<p>Ecuador considera que esta definición es más completa</p>	Ecuador
<p>“Coeliac disease”</p> <p>Footnote 2 should also be inserted here since this definition does not cover all cereals containing gluten which causes internal inconsistency.</p> <p>AOECS considers the last sentence of footnote 2 somewhat confusing. The statement in 4.2.3 is clear and may also be applied to footnote 2.</p>	Association Of European Coeliac Societies Codex and Regulatory Affairs
4. MANDATORY LABELLING OF PREPACKAGED FOODS	
<p>4.2 Lista de ingredientes</p> <p>Guatemala manifiesta su preocupación al dejar un listado abierto a consideración de las autoridades regionales o nacionales para la eximición u obligación de la declaración del etiquetado, ya que considera que esto aleja la estandarización de requisitos en el</p>	Guatemala

<p>etiquetado de los alimentos preenvasados y puede presentar dificultades para la comercialización de productos,, sin embargo, tomando en cuenta que hay evaluación de riesgo, se solicita considerar nuevamente que se presente un listado cerrado como se encuentra hoy en día en la Norma General de Etiquetado de los Alimentos vigente.</p>	
<p>4.2.1.3 Where an ingredient is itself the product of two or more ingredients, such a compound ingredient may be declared, as such, in the list of ingredients, provided that it is immediately accompanied by a list, in brackets, of its ingredients in descending order of proportion (m/m). Where a compound ingredient (for which a name has been established in a Codex standard or in national legislation) constitutes less than 5% of the food, the ingredients need not be declared, except for the foods and ingredients listed in section 4.2.1.4, 4.2.1.7 and where applicable section 4.2.1.5 and food additives <u>and processing aids</u> which serve a technological function in the finished product.</p> <p>AOECS suggests to add after food additives "and processing aids" to be in line with 4.2.4.2</p>	<p>Association Of European Coeliac Societies Codex and Regulatory Affairs</p>
<p>4.2.1.4 EFA agrees with the addition of genus names for tree nuts, and encourages the same labelling type to apply for PAL too.</p>	<p>European Federation of Allergy and Airways Diseases Patients' Associations</p>
<p>4.2.1.4 FIA proposes the inclusion of prunus dulcis as an alternative scientific name for almond. The scientific name is also being referred to in the FAO/WHO Expert Committee Part 2 Full Report.</p>	<p>Food Industry Asia</p>
<p>4.2.1.4 While the FAO and WHO define "egg" as the "fresh edible portion of the spheroid body produced by female birds, especially domestic fowl", the evidence gathered to establish a reference dose is based on hen's egg. Therefore, FIA believes it is essential to explicitly indicate that the allergen labelling declaration is required only for hen's eggs.</p>	<p>Food Industry Asia</p>
<p>4.2.1.4 With respect to the names listed in 4.2.1.4 and 4.2.1.5 Canada suggests that the specified name for fish should be either the name of the fish or the class name "fish". Similarly Canada suggests that the specified name for crustacea should be either the name of the crustacea (lobster, shrimp, crab) or the word "crustacea".</p> <p>Under the current wording a product containing salmon as an ingredient that uses a Contains statement would have to say "Contains : fish". Canada believes such a product should also be able to use "Contains : salmon". Similarly a product which uses lobster as an ingredient should be able to use "Contains : lobster".</p> <p>Canada suggests the specified name " 'fish' " 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"</p> <p>From table below:</p> <p>Crustacea and products thereof - 'crustacea or the name of the crustacea'</p> <p>Fish and products thereof - 'fish or the name of the fish'</p>	<p>Canada</p>
<p>4.2.1.4 The following foods and ingredients are known to trigger food allergy or coeliac disease and shall always be declared using the specified name in addition to or as part of the ingredient name¹÷ <u>when present as part of the formulation of a food:</u></p>	<p>Canada</p>

<p>Canada believes that it should be specified that the declaration of allergens in the list of ingredients should be reserved for situations when the allergen is intentionally added as part of the formulation of the food (to specify that the list of ingredients or Contains statement is not to be used for allergens present due to cross contact). This can be achieved by modifying 4.2.1.4 as follows :</p> <p>4.2.1.4 The following foods and ingredients are known to cause hypersensitivity and shall always be declared using the specified name in addition to or as part of the ingredient name¹ "when present as part of the formulation of a food"</p> <p>This would also address instances when allergens are present as third or fourth level ingredients of ingredients.</p>	
<p>4.2.1.5 EFA agrees with the addition of genus names for tree nuts, and encourages the same labelling type to apply for PAL too.</p>	<p>European Federation of Allergy and Airways Diseases Patients' Associations</p>
<p>4.2.1.5 Thailand would like to propose the inclusion of Macadamia ternifolia species for macadamia, according to Codex Classification of Foods and Animal Feeds (CXA 4-1989).</p> <p>The Codex Classification includes the traded species of foods and animal feed. All species of macadamia should be listed to ensure the safety of allergic consumers.</p>	<p>Thailand</p>
<p>4.2.1.5 Under 4.2.1.5 mustard is listed as one of the allergenic foods; we suggest including the scientific names for mustard: Brassica juncea; Brassica nigra and Sinapis alba; like including such scientific name is already applied for some other foods.</p> <p>Next to argumentation given above on Question 8, we would like to emphasise that many food industries already have implemented key measures for allergen management and apply detailed assessment of risks, including consideration of available eliciting dose data, before they apply a PAL statement on the product. Based on other industry assessments, we don't think that there is evidence that using a PAL statement in justified cases where the amount of allergen is below the reference dose. There is a critical need for education which clarifies that a PAL statement is about incidental allergen presence and a single consumer experience of not having an allergic reaction or an analytical assessment being negative does not mean that PAL is not justified.</p>	<p>FoodDrinkEurope</p>
<p>4.2.1.5 We appreciate the fact that the EWG has added scientific names for tree nuts and note that the same was done for cereals containing gluten.</p> <ul style="list-style-type: none"> o ISDI however notes that the specified name 'gluten' was not added as a specified name in the column called "SPECIFIED NAME" as shown in the tables below and would appreciate if the Committee could consider adding it to section 4.2.1.4 for PAL purposes. o Additionally, could the Committee consider adding scientific names for all plant allergens in the column called "FOOD AND INGREDIENTS" as shown in the table below? <p>This would ensure consistency of the document, but above all clarify for which species allergen labelling applies, in particular when it comes to, for example, 'mustard'.</p> <ul style="list-style-type: none"> o Finally, could the Committee also consider adding 'treenuts' for PAL purposes only to section 4.2.1.4 and 4.2.1.5 as a specified name in the column called "SPECIFIED NAME" as shown in the tables below? This would be helpful when several potential treenut cross-contacts are identified as significant following risk assessment. Indeed, due to the likelihood of cross-sensitization to 	<p>International Special Dietary Food Industries</p>

<p>multiple tree nut allergens, the patient treatment guideline is strict avoidance of all nuts once one tree nut allergy has been diagnosed¹. There is therefore no benefit in listing tree nuts in detail when discussing PAL.</p> <p>1 Smeekens JM, Bagley K, Kulis M. Tree nut allergies: Allergen homology, cross-reactivity, and implications for therapy. Clin Exp Allergy. 2018 Jul;48(7):762-772. https://doi.org/10.1111/cea.13163</p> <p>ISDI suggests defining a process for the update of foods and ingredients listed in sections 4.2.1.4, 4.2.1.7, and 4.2.1.5.</p>	
<p>4.2.1.5 footnote 5 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). https://doi.org/10.4060/cc6081en</p>	Brazil
<p>4.2.1.6 Jamaica supports providing a list of exemptions in the GSLPF because this could promote harmonization and facilitate trade. It would not be convenient for all countries to conduct research on exemptions.</p>	Jamaica
<p>4.2.1.6 FIVS supports Section 4.2.1.6 and footnote, allowing national authorities the discretion to exempt certain ingredients from being labelled based on established criteria.</p>	FIVS
<p>4.2.1.6 ICGMA supports the revised version of section 4.2.1.6 which includes a referral to the FAO and WHO Part 4 risk assessment for food allergens that addresses how to establish exemptions. This should be sufficient for national authorities to refer to when making determinations on exemptions.</p>	ICGMA
<p>4.2.1.6 Subject to evaluation using established criteria⁷, regional or national authorities may exempt specific ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, may be exempted from being declared. <u>Acceptable exemptions may include e.g., highly refined products, as well as their products thereof in so far as the process that they have undergone is not likely to increase the level of allergenicity assessed by the regional and/or national competent authority for the relevant product from which they originated, such as: wheat-based glucose syrups including dextrose; wheat-based maltodextrins; glucose syrups based on barley; fish gelatine used for certain food processing purpose (e.g.; as a carrier for vitamin or carotenoid preparations or used as fining agent in beer and wine); soybean oil and fat; tocopherols from soybean source vegetable oils derived phytosterols and phytosterol esters from soybean sources; plant stanol ester produced from vegetable oil sterols from soybean sources; cereals, whey or nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin.</u></p> <p>ICGA can support the proposed alternative text to refer to “accepted exemptions” as listed in Table A1.1 of Appendix 1 of the FAO/WHO expert consultation - Part. 4, but would question referring to “current” in a Codex text, as any Codex text is generally the reflection of the “current” or situation at the time of their initial development or of their ex post-adoption/revision.</p> <p>ICGA further suggests CCL community to consider whether it could be acceptable to add to paragraph 4.2.1.6 a new sentence, or a footnote or place the following text within a more comprehensive information document -- which could then be made available on the Codex website resources page -- to read: “Acceptable exemptions may include e.g., highly refined products, as well as their products thereof in so far as the process that they have undergone is not likely to increase the level of allergenicity assessed by the regional and/or national competent authority for the relevant product from which they originated, such as: wheat-based glucose syrups including dextrose; wheat-based maltodextrins; glucose syrups based on barley; fish gelatine used for certain food processing purpose (e.g.; as a carrier for vitamin or carotenoid preparations or used as fining agent in beer and wine); soybean oil and fat; tocopherols from soybean source vegetable oils derived phytosterols and phytosterol esters from soybean sources; plant stanol ester produced</p>	ICGA

<p>from vegetable oil sterols from soybean sources; cereals, whey or nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin.”</p> <p>ICGA notes that technical progress could also warrant other substances such as behenic acid (from mustard) with a minimum of 85 % of purity and obtained after two distillation steps used in the manufacturing of the emulsifiers E 470a, E 471 and E 477, to benefit from further exemptions.</p>	
<p>4.2.1.6 Subject to evaluation using established criteria⁷, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared declared <u>declared [according to the provisions applied in section 8].</u></p> <p>The United States supports the proposed text in 4.2.1.6. However, as most allergenic foods are already declared in the ingredient statement, the United States suggests that it be made clear in 4.2.1.6 that the exemption is from declaring the allergenic foods as specified under section 8. The United States recommends section 4.2.1.6 include additional text for this clarity as follows:</p> <p>4.2.1.6 Subject to evaluation using established criteria, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4 and where applicable section 4.2.1.5, from being declared [according to the provisions applied in section 8].</p> <p>The United States does not support listing of common exemptions but would support referencing the exemptions listed in the FAO/WHO report as examples.</p>	USA
<p>4.2.1.6 Japan supports the Section 4.2.1.6 for the exemption of allergen labelling, but does not support to reference to the criteria established by the expert panel here, that is around the relevant reference doses (RfD) divided by 30 (RfD/30). As there is no consensus and definition of RfD, nor established detection method of such low level of amount of the food allergen in each serving size of each prepackaged food. Thus, the proposed texts might not work at present and for a while, unfortunately. Japan considers that the exemption of allergen labelling should be controlled by the authority of each country/area, at present, until the CCFL acquire the practical criteria and practical quantification of each food allergen. As for the list of “current accepted exemptions”, it should be noted that these observations are not meant to be recommendations or endorsement for the exemption from required allergen labelling on a global basis. It is just an information and should not be added.</p>	Japan
<p>4.2.1.6 We support the above language which allows exemptions from declaration for foods derived from allergens that have been evaluated using the established criteria and for which safety has been substantiated. Officially listing out current accepted exemptions, either in the general standard for the labelling of prepackaged foods or elsewhere, would be a helpful reference, however it is still important to apply the established criteria to each product individually as differences between similar products may exist.</p>	International Association of Consumer Food Organizations
<p>4.2.1.6 India supports the revised version of section 4.2.1.6</p>	India
<p>4.2.1.6 EFA agrees with the wording of 4.2.1.6 as proposed. Furthermore, we support providing a list of exemptions in the GSLPF, based on the scientific advice arising from the relevant FAO/WHO report of 2024 (https://www.who.int/publications/i/item/9789240088924). This could be done by way of a table.</p> <p>Meanwhile, EFA reminds that beer should be removed from the list of exemptions (provided in Australia and New Zealand) due to its high content in wheat, barley and gluten.</p> <p>Moreover, we would like to highlight that there are at least two current exemptions that are not listed in this table:</p>	European Federation of Allergy and Airways Diseases Patients’ Associations

<ul style="list-style-type: none"> • Lactitol (exempted in the EU and Argentina) • Refined oils (exempted in the USA), including refined fish oil e.g. DHA and other oils (except cold pressed oils). <p>Overall, EFA strongly believes that applying exemptions must not lead to a potential harm to food allergy patients. At the same time, unnecessary restrictions on food choices often leads consumers with food allergy to develop clinical anxiety towards their available food options.</p>	
<p>4.2.1.6 SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa agrees with the proposed changes in 4.2.1.6 and also support the request for the weight of evidence approach including an exposure assessment and other established criteria. • We support the inclusion of the list of exemptions with links to the references in relation to the scientific advice. This should be included as an Annex to the GSLPF. <p>Specific comments on footnote 6 on page 11</p> <ul style="list-style-type: none"> • To keep the text consistent with 4.2.1.6 and footnote 6 on page 11, it is recommended to include the words “regional or” in the text before “national”, as follows: <p>Footnote 6: “Oats can be tolerated by most but not all people who are intolerant to gluten. Therefore, the allowance of oats that are not contaminated with wheat, rye or barley in foods covered by this standard may be determined at the regional or national level”.</p>	South Africa
<p>4.2.1.6 Thailand proposes clear reference to the specific parts of Report 4 should be made for better clarity and ease of use. We propose to amend Footnote 7 as follows:</p> <p>“7 FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens. (Figure 1 outlines the process for consideration and Annex 1 provides examples of foods and ingredients derived from priority allergens that are exempted from allergen labelling). https://doi.org/10.4060/cc9554en”</p>	Thailand
<p>4.2.1.6 Apoyamos la sección 4.2.1.6. El informe de la FAO/OMS recomienda el uso de Dosis de Referencia (RfD) como base para las exenciones. Sin embargo, deseamos señalar que estas RfD están establecidas para manejar la presencia incidental de alérgenos. Las exenciones del 4.2.1.6 se refieren a materiales que están presentes de manera intencional y constante; las RfD (Dosis de Referencia) pueden no ser apropiadas para tales situaciones.</p>	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
<p>4.2.1.6 New Zealand supports the text at 4.2.1.6 including the footnote reference to the Expert Committee’s Part 4 report. New Zealand supports the ability for national authorities to exempt ingredients derived from foods listed in 4.2.1.4 and where applicable 4.2.1.5 from making allergen declarations where processing has resulted in removing the risk posed by the allergen. We agree this should be determined by the process for establishing such exemptions outlined in the part 4 report.</p> <p>New Zealand sees benefit in providing a list of current accepted exemptions. We consider this would be a useful tool for national authorities considering exemptions and could support countries that may not have the resource to carry out the necessary risk assessments to support these exemptions. The Expert Committee Part 4 Report notes that exposure in reasonable worst-case scenarios for the exemptions approved to date led to values around the reference doses established. This, along with history of safe use, provides reassurance that risk from the current agreed exemptions has been considered by the Expert Committee and assessed</p>	New Zealand

<p>as acceptable against the process established in their Part 4 Report. Providing such a list as examples may be appropriate and would signal it is not an exhaustive list. The list could be added to as necessary if the Committee is presented with evidence that meets the criteria for an exemption as per 4.2.1.6.</p> <p>New Zealand considers it useful to clarify that an allergen exempt from declaration would still be permitted to be declared voluntarily. This would reduce the burden of having different labels for different countries if an exemption exists in only some countries.</p>	
<p>4.2.1.6 We support the removal of the brackets and inclusion of provision 4.2.1.6 and reference to the to the FAO/WHO report 4 to provide guidance to countries/regional authorities on determining allergen exemptions. However, the Committee should consider that while the FAO/WHO report should be a primary reference, advances in science and technology may merit the use of additional criteria in the future.</p> <p>As a matter of information, clarification might be relevant regarding requirements to establish a history of safe use, as these generally include exposure data in a determined population. A differentiation between available exposure data to determine the history of safe use and exposure assessment as determined by the Expert Committee's report might be discussed to further clarify and standardize the risk assessment of exemptions for food allergens.</p> <p>List of exemptions</p> <p>While providing a list of exemptions could facilitate global harmonization of allergen declaration, it may also introduce complexities - these include the selection of exemptions, the varying conditions for these exemptions across different markets, and the need for regular updates and reviews. These updates can be time-consuming and may quickly render the standard obsolete. Therefore, we believe that it would be helpful to either provide a non-exhaustive list of exemptions or reference the 'current accepted exemptions' as examples for national/regional authorities. Providing additional information on a list of exemptions could help promote labeling harmonization and assist countries that may not have the resources to undertake evaluations for exemptions.</p>	<p>International Confectionery Association</p>
<p>4.2.1.6 Exemptions</p> <p>The EU expresses its appreciation to the chairs for having put forward the alternative text proposed during the last round of consultations (CP2) for further consideration. As previously explained, the EU is of the view that an exposure assessment is an integral component of the safety assessment process required for granting exemptions. Therefore, the EU believes that the proposed alternative text provides necessary clarity regarding the inclusion of such an assessment.</p> <p>List of exemptions</p> <p>The EU reaffirms its position against the inclusion of a non-risk-assessed list of exemptions, for the reasons outlined in the background document opposing such a list. Furthermore, the EU does not deem it necessary to reference the 'current accepted exemptions' as examples, as this is neither common practice in Codex Standards nor necessary, given that the relevant report, containing these examples, is already referenced in the context of the evaluation criteria in section 4.2.1.6.</p>	<p>European Union</p>
<p>4.2.1.6 The UK believes that a list of exempted food products should not be provided, as their allergenicity could vary depending upon production methods, which Codex does not standardise.</p>	<p>United Kingdom</p>
<p>4.2.1.6 FIA supports section 4.2.1.6 with a footnote referencing the FAO/WHO Expert Consultation Part 4 Full Report. We agree that exemptions be granted by regional or national authorities based on their risk assessments. However, we believes that these</p>	<p>Food Industry Asia</p>

<p>exemptions should be voluntary, in that an exempt allergen should still be permitted to be declared. This approach would reduce the burden of having different labels for different countries if an exemption exists in only some countries.</p>	
<p>4.2.1.6 Australia supports the proposed text including the addition of 'regional' and the revised footnote requiring use of established criteria from the FAO/WHO Expert committee (Part 4 report) to ensure appropriate risk assessments underpin labelling exemptions.</p> <p>However, in considering the proposed alternate text we agree an exposure assessment should be part of the evaluation process and that this may not be clear in flow chart process detailed by the Expert Committee. We therefore could support the alternate text but without reference to 'a weight of evidence approach' because the Expert Committee's Part 4 report (referenced in the footnote) already contains the necessary criteria on the type of evidence that should be used.</p> <p>If there is CCFL support for this alternate text, we propose the text be amended as follows:</p> <p>4.2.1.6 Regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared. Such exemptions shall be subject to an evaluation that includes an exposure assessment and other established criteria.</p> <p>In relation to including a list of exemptions in the GSLPF, as the Expert Committee did not undertake risk assessments of these 'current accepted exemptions', Australia does not support including a list of exemptions. However, we could support referencing these 'current accepted exemptions' as examples for national/regional authorities.</p>	<p>Australia</p>
<p>4.2.1.6 Position: Uganda proposes to amend the agreed existing text (appendix II) with the addition of "including the weight of evidence and exposure assessment where necessary "after the established criteria.</p> <p>New amendment of 4.2.1.6 to read as: Subject to evaluation using established criteria⁷ including the weight of evidence and exposure assessment, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared.</p> <p>Rationale: This will not only emphasise history of safe use but also Weight of Evidence</p>	<p>Uganda</p>
<p>4.2.1.6 Canada supports section 4.2.1.6</p>	<p>Canada</p>
<p>4.2.1.6 Egypt supports the revised version of section 4.2.1.6 which includes a referral to the FAO and WHO regarding the risk assessment for food allergens that addresses how to establish exemptions.</p>	<p>Egypt</p>
<p>4.2.1.6 Indonesia supports the proposed revision of Section 4.2.1.6.</p>	<p>Indonesia</p>
<p>4.2.1.6 The Principle 4.2.1.6 as proposed below is clear and the amendment clarifies that the evaluation should follow a weight of evidence approach that includes an exposure assessment and other criteria established by the FAO and WHO Expert Committee in the Risk assessment of food allergens: Part 4 report.</p> <p>"4.2.1.6 Subject to evaluation using established criteria⁷, regional or national authorities may exempt ingredients derived from foods listed in section 4.2.1.4, and where applicable section 4.2.1.5, from being declared."</p> <p>ISDI notes that the EWG Chairs did not propose providing a list of exemptions in the GSLPF due to diverse EWG views. ISDI therefore encourages CCFL providing a list of exemptions in the GSLPF (or another standalone list that could be regularly updated with the support of the Expert Committee) in order to promote harmonisation and facilitate trade, assist countries that may not have the resources to undertake evaluations for exemptions, and potentially increase the range of safe foods available to food allergic</p>	<p>International Special Dietary Food Industries</p>

<p>consumers. ISDI therefore suggests to define a process for the update of the list of exemptions, which should consider the inclusion of foods evaluated by regional or national authorities using established criteria.</p>	
<p>4.2.1.6 We support setting guidance for criteria exempting certain derivative products arising from allergenic foods. However, as long as there is no agreement on such criteria at Codex level, the inclusion of a list of exemptions that may or may not fulfil such criteria could lead to confusion and perpetuate exemptions that are not covered by these.</p> <p>Furthermore, we wish to repeat our input shared in July that the footnote 7 text should begin with: "For example".</p> <p>7 For Example: FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens.</p> <p>The FAO/WHO report advises use of RfD's as a base for exemptions. However, we wish to note that these RfDs are set to manage incidental presence of allergens. Exemptions concern intentionally and consistently present materials; RfD's may not be appropriate for such situations.</p>	<p>FoodDrinkEurope</p>
<p>4.2.1.6 IDF supports this section.</p> <p>We agree that there can be exemptions granted by regional or national authorities based on a risk assessment.</p> <p>We note however that exemptions should be voluntary in that an exempt allergen should still be permitted to be declared, to reduce the burden of having different labels for different countries if an exemption exists in only some countries.</p>	<p>IDF/FIL</p>
<p>4.2.1.6 ICBA supports section 4.2.1.6.</p>	<p>ICBA</p>
<p>4.2.1.6 Paraguay: coincidimos con el punto, consideramos pertinente que quede el punto en cuestión</p>	<p>Paraguay</p>
<p>4.2.1.6 EFAD supports the wording and suggest to mention the current accepted exemptions' as examples to harmonise and facilitate trade and, importantly, assist countries that may not have the resources to undertake evaluations for exemptions. However, in order to ensure the highest level of consumer's protection it will be recommended to undertake an independent risk assessment of those exemptions by the Expert Committee to have a Codex evaluated proposal and update it periodically</p>	<p>The European Federation of the Associations of Dietitians (EFAD)</p>
<p>4.2.1.6 Saudi Arabia does not support including a list of exemptions in the GSLPF based on the 'current accepted exemptions' for the following reasons:</p> <ul style="list-style-type: none"> • The Expert Committee states that the "observations are not meant to be recommendations or endorsements for the exemption of a derivative from required allergen labeling on a global basis." • Some foods or ingredients, such as glucose syrups (wheat), have not undergone clinical studies to support the exemption. <p>Additionally, countries can reference the 'current accepted exemptions' in Annex 1 from the Expert Committee's Part 4 report in their national regulations without necessitating their inclusion in the GSLPF.</p>	<p>Saudi Arabia</p>
<p>4.2.1.6 Costa Rica considera que debería promoverse la armonización proporcionando la lista de "exenciones actualmente aceptadas" en la NGEAP tomando en consideración el informe del Comité de expertos. Adicionalmente, la lista debería mantenerse actualizada con base en la información científica disponible, mediante una base de datos en el sitio de la FAO dedicado al tema de alérgenos y referenciada en el pie de página de la NGEAP.</p>	<p>Costa Rica</p>

<p>4.2.1.6 La segunda opción es una buena alternativa, dado que para la creación de una lista positiva de exenciones de alérgenos es importante contar con una recomendación formal por parte del comité de expertos. Esto teniendo en cuenta que en el informe de la FAO y la OMS (2024) titulado Risk assessment of food allergen: Part 4 – report, dejaron claro que las observaciones no pretenden ser recomendaciones o respaldo para la exención de un derivado del etiquetado de alérgenos requerido a nivel mundial.</p>	<p>Colombia</p>
<p>4.2.1.6 No hay objeciones particulares al texto propuesto.</p> <p>Sin embargo, podría ser relevante aclarar los requisitos para establecer un historial de uso seguro, ya que estos generalmente incluyen datos de exposición en una población determinada. Se podría discutir una diferenciación entre los datos de exposición disponibles para determinar el historial de uso seguro y la evaluación de la exposición según lo determinado por el informe del Comité de Expertos para aclarar y estandarizar aún más la evaluación de riesgos de las exenciones para alérgenos alimentarios.</p> <p>Con relación a la lista de exenciones, si bien podría facilitar la armonización global de la declaración de alérgenos, también puede introducir complejidades, que incluyen la selección de exenciones, las diferentes condiciones para estas exenciones en los diferentes mercados y la necesidad de actualizaciones y revisiones periódicas. Estas actualizaciones pueden llevar mucho tiempo y hacer que el estándar quede obsoleto rápidamente. Por lo tanto, se recomienda hacer referencia a las “exenciones aceptadas actualmente” en lugar de crear una lista positiva de exenciones en esta norma.</p>	<p>Argentina</p>
<p>4.2.1.6 Uruguay considera que no se debe realizar exenciones y no tiene estudios para plantear exenciones.</p>	<p>Uruguay</p>
<p>4.2.1.6 El país está de acuerdo con el texto alternativo propuesto ya que tiene base científica para su determinación; así como, también apoya la inclusión de la lista de exenciones en la NGEAP.</p> <p>Sin embargo, apoyaría la mejor decisión adoptada en CCFL48</p>	<p>Ecuador</p>
<p>4.2.1.6 footnote 7 FAO and WHO (2024). Risk assessment of food allergens: Part 4: Establishing exemptions from mandatory declaration for priority food allergens (Figure 1 outlines the process for consideration and Annex 1 provides the examples of foods and ingredients derived from priority allergens that are exempted from allergen labelling). https://doi.org/10.4060/cc9554en</p> <p>Thailand proposes clear reference to the specific parts of Report 4 should be made for better clarity and ease of use.</p>	<p>Thailand</p>
<p>4.2.1.7 Jamaica supports the statement</p>	<p>Jamaica</p>
<p>4.2.1.7 FIVS supports the revised section 4.2.1.7. We believe sulphites should remain in this text and should be declared at 10 mg/kg or more in a food given the lack of new risk assessments on the subject. We also welcome the possibility to use either term: sulphite or sulfite.</p>	<p>FIVS</p>
<p>4.2.1.7 Regarding section 4.2.1.7: As JECFA has not provided an updated risk assessment for sulfites, the United States supports retaining the current approach to the declaration of sulfites. Regarding the bracketed text (as offered to the consumer/as consumed), the United States supports the first option “as offered to the consumer” as it is consistent with the JECFA risk assessment.</p>	<p>USA</p>
<p>4.2.1.7 ICGMA continues to support sulfites declaration be determined on products as packaged as this is how the consumer is purchasing the product. We would recommend removing “[as offered to the consumer/as consumed]” as follows</p> <p>ICGMA also recommends simplifying the footnote 8 text as content is duplicative.</p>	<p>ICGMA</p>

<p>4.2.1.7 EFAD supports the option "as consumed" as it is consistent with the European regulation (RE 1169/2011) on the provision of food information to consumers that specifically mentions "as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers"</p>	<p>The European Federation of the Associations of Dietitians (EFAD)</p>
<p>4.2.1.7 IACFO expresses no preference regarding these two options.</p>	<p>International Association of Consumer Food Organizations</p>
<p>4.2.1.7 "as consumed" is generally the term used in other Codex texts.</p>	<p>ICGA</p>
<p>4.2.1.7 This description is helpful and should be incorporated.</p>	<p>ICUMSA</p>
<p>4.2.1.7 Regarding the additional text 'as offered to the consumer/as consumed', at EFA we believe that sulphite in concentrations of 10mg/kg or more should be declared in both cases: as offered to the consumer AND as consumed i.e. following preparation before consuming at home.</p>	<p>European Federation of Allergy and Airways Diseases Patients' Associations</p>
<p>4.2.1.7 SA position and rationale:</p> <ul style="list-style-type: none"> • South Africa supports sulphite and the proposed revised text which includes the options of 'food as offered to the consumer' and 'food as consumed' as put forward by the Chairs as well as the addition of the footnote 8. 	<p>South Africa</p>
<p>4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more⁸ 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.</p> <p>We propose the deletion of the proposed texts in square brackets as the current requirement is sufficiently clear.</p>	<p>Thailand</p>
<p>4.2.1.7 ALAIAB sigue apoyando el etiquetado de sulfito en los alimentos envasados, que se describen aquí como "alimentos tal como se ofrecen al consumidor".</p> <p>Así mismo con respecto de la nota al pie sugerimos que se modifique de la siguiente manera:</p> <p>Sulfito medido como la concentración total de dióxido de azufre (SO₂) y en equivalentes de dióxido de azufre.</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>4.2.1.7 New Zealand supports the 10mg/kg sulphite threshold for the declaration of sulphites being applied to the food 'as sold'. We consider this aligns with the declaration of foods and ingredients listed in 4.2.1.4 and when applicable 4.2.1.5 neither of which refer to 'as consumed' or 'as offered to the consumer'. This also aligns with the current text in the GSLPF given the standard is for 'prepackaged foods' (not ready to eat foods).</p> <p>We do not support either text in square brackets.</p> <p>We consider "As offered to the consumer" is ambiguous as it could either mean "as sold" (e.g. not reconstituted) or "as consumed" (e.g. reconstituted). Declaring sulphites "as consumed" is impractical to assess for foods that are intended to be mixed with other foods for consumption. There may be sulphites contributed from those other foods. It is therefore not possible to know what the level of sulphite is on the food "as consumed". In addition consumers may not prepare the food in accordance with the directions.</p>	<p>New Zealand</p>

<p>New Zealand considers the text in 4.2.1.7 (without the text in square brackets) applies the threshold to food as sold. However, we acknowledge that there was confusion in the Committee on this point and therefore to provide clarity we suggest adding the words 'as sold' in place of the text in square brackets to make it explicit.</p> <p>New Zealand also supports allowing the alternative spelling 'sulfités'.</p>	
<p>4.2.1.7 The EU supports the proposed wording of section 4.2.1.7. The EU favours the inclusion of the phrase "food as consumed" within the square brackets, as it accurately reflects the condition of the food after preparation or reconstitution. In contrast, the phrase "as offered to the consumer" may introduce ambiguity, particularly for products requiring reconstitution.</p> <p>Moreover, the additional wording "food as consumed" ensures full alignment with existing risk assessments, which highlight the significant risk associated with the consumption of sulphites above 10 mg/kg. This is especially relevant to the General Standard for Food Additives (GSFA) (CXS192–1995), which, by default, sets maximum levels based on the final product as consumed.</p>	European Union
<p>4.2.1.7 The decision to label sulphites should be based on the food as consumed, which reflects the UK regulation.</p>	United Kingdom
<p>4.2.1.7 FIA does not support either option in square brackets and proposes replacement with 'as sold' for alignment with the current GSLPF labelling requirement which focus on products as packaged.</p> <p>"As offered to the consumer" is ambiguous in that it could either mean "as sold" (e.g. not reconstituted) or it could mean "as consumed" (e.g. reconstituted). We do not believe that ambiguity is appropriate in the case of allergen labelling.</p> <p>"As consumed" is impractical to assess for foods that are intended to be mixed with other foods for consumption. There may be sulphite contributed from those other foods. It is therefore not possible to know what the level of sulphite is on the food "as consumed". "As consumed" also increases the risk of a susceptible consumer having a reaction if they did not follow the food preparation instructions on the label. Proper food preparation would typically decrease the sulphite content (e.g. reconstitution with water, or mixing with other ingredients).</p> <p>We recognise that in the context of food additives, the GSFA considers the addition rates on an "as consumed" basis as per the preamble of the GSFA unless otherwise specified by a Note. However, we note that the consequences of consuming a food additive at levels above the maximum level are different to the consequences of consuming sulphites above the threshold level in that for sulphites, there can be a reaction from a one-off consumption event whereas for additives, adverse health effects would be through over-exposure over a longer term.</p>	Food Industry Asia
<p>4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more⁸ in a food [as as offered to the consumer/as consumed consumer shall always be declared using the specified name 'sulphite' or 'sulfité' in addition to or as part of the ingredient name.</p> <p>Of the two options in the square brackets, Australia prefers 'food as offered to the consumer' as this is consistent with the existing declaration requirement and reflects the scope of the GSLPF which 'applies to the labelling of all prepackaged foods to be offered as such to the consumer'. We do not support 'food as consumed', because if foods are intended to be mixed with other foods for consumption there may be sulphite contributed from those other foods, and therefore it is not possible to know what level of sulphite is in the food 'as consumed'. 'As consumed' also increases the risk to susceptible consumers if on-label food preparation instructions aren't followed correctly.</p>	Australia

<p>While recognising the GSFA contains maximum levels on an ‘as consumed’ basis as per the preamble of the GSFA unless otherwise specified, the consequences of consuming a food additive at levels above the maximum level are different to the consequences of consuming sulphites above the threshold. For sulphites, there can be a reaction from a one-off consumption event whereas for additives, adverse health effects would be through exposure over a longer term.</p>	
<p>4.2.1.7 Uganda proposes that the option “ as offered to the consumer” in the square brackets be considered.</p> <p>Rationale: A regulator will only safeguard the customer up until the point at which they receive the pre-packaged food; hence, monitoring at 10 mg/kg or more is only feasible at this stage and cannot continue after the consumer has made the purchase of the food.</p>	Uganda
<p>4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more⁸ in a food [as offered to the consumer/as consumed] for sale shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</p> <p>Canada believes that sulphites declaration should be required on foods based on the level of sulphites in the food at the point of sale to consumers or for catering purposes, not as consumed.</p> <p>Canada suggests the use of the words “as offered for sale” to clarify this point. Canada is not supportive of “as consumed”.</p>	Canada
<p>4.2.1.7 Egypt continues to support labelling sulphite on food in its packaged form, which is described here as “food as offered to the consumer / as consumed” with footnote no. 8 to be written as follows :</p> <p>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.</p> <p>Foot note no. 8 : Sulphite measured as the total concentration of sulphur dioxide (SO₂) and sulphur dioxide equivalents.</p>	Egypt
<p>4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more⁸ in a food [as offered to the consumer/as consumed] as consumed shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</p> <p>Indonesia proposes to open the square brackets and prefers the option “as consumed” as follows:</p> <p>Sulphite when present in concentrations of 10 mg/kg or more^[8] in a food as consumed shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</p>	Indonesia
<p>4.2.1.7 The Principle 4.2.1.7 as amended is clearer when reference is made to “(...) food as consumed”. The proposal “(...) food as offered to the consumer” does not specify whether a reconstitution step of the product should always be considered (if any) when offering the food to the consumer. It could also be interpreted that the food is offered to the consumer at the point of selling (even if the product must be reconstituted before consumption).</p> <p>In addition, ISDI notes that the wording ‘as offered to the consumer’ is not the standard Codex wording while ‘as consumed’ is the standard Codex wording since it is used for example in CXS 192-1995, Note 381.</p> <p>ISDI therefore supports the following proposal:</p> <p>“4.2.1.7 Sulphite when present in concentrations of 10 mg/kg or more⁸ in a food as consumed shall always be declared using the specified name ‘sulphite’ or ‘sulfite’ in addition to or as part of the ingredient name.</p>	International Special Dietary Food Industries

8 Sulphite measured as the total concentration of sulphur dioxide (SO ₂) and sulphur dioxide equivalents.”	
<p>4.2.1.7 FoodDrinkEurope appreciates the inclusion of “in a food as consumed”, but not the inclusion of “food as offered to the consumer”. We believe that sulphite risk assessment should be made on food as consumed.</p> <p>While minimal eliciting doses have not been systematically assessed, based on challenges in 236 patients* a value of 3 mg is a good indication. Thus, a single 300 g consumed portion of food containing sulphites at 10 mg/kg may be assumed to cause no reaction in the majority of sensitive consumers.</p> <p>We would also welcome a clarification on naturally occurring sulphites (for instance present in garlic) versus added sulphite. Moreover, when using a 10 mg/kg threshold for labelling - especially for foods that are dehydrated or concentrated and need reconstitution before consumption - a situation would arise where sulphite is declared as allergen in these concentrated sources, whereas the fresh food alternative would not feature such an indication.</p>	FoodDrinkEurope
<p>4.2.1.7 IDF does not support either option in square brackets.</p> <p>“As offered to the consumer” is ambiguous in that it could either mean “as sold” (e.g. not reconstituted) or it could mean “as consumed” (e.g. reconstituted). We do not believe that ambiguity is appropriate in the case of allergen labelling.</p> <p>“As consumed” is impractical to assess for foods that are intended to be mixed with other foods for consumption. There may be sulphite contributed from those other foods. It is therefore not possible to know what the level of sulphite is on the food “as consumed”.</p> <p>“As consumed” also increases the risk of a susceptible consumer having a reaction if they did not follow the food preparation instructions on the label. Proper food preparation would typically decrease the sulphite content (e.g. reconstitution with water, or mixing with other ingredients).</p> <p>We recognise that in the context of food additives, the GSFA considers the addition rates on an “as consumed” basis as per the preamble of the GSFA unless otherwise specified by a Note. However, we note that the consequences of consuming a food additive at levels above the maximum level are different to the consequences of consuming sulphites above the threshold level in that for sulphites, there can be a reaction from a one-off consumption event whereas for additives, adverse health effects would be through over-exposure over a longer term.</p> <p>We therefore propose replacement with “as sold”</p>	IDF/FIL
<p>4.2.1.7 ICBA continues to support labeling sulphite on food in its packaged form, which is described here as ‘food as offered to the consumer’</p> <p>As previously recommended during the EWG consultation process, we view some of the footnote content to be redundant, which makes it confusing. We suggest this be amended to read as follows:</p> <p>8Sulphite measured on a sulphur dioxide (SO₂) equivalents basis.</p>	ICBA
<p>4.2.1.7 Paraguay: Consideramos que la expresión [tal como se ofrece al consumidor o tal como se consume] es la mas apropiada teniendo en cuenta las opciones que se ofrece para su declaración, el cual depende de su uso y fines tecnológicos en el alimento.</p>	Paraguay

<p>4.2.1.7 Saudi Arabia is in favor of the proposed revised text in Section 4.2.1.7, specifically supporting the option of ‘food as consumed’. This approach ensures that sulphite levels are assessed based on the actual state of the food when it is ingested by the consumer, providing a more accurate evaluation of potential exposure and health risks.</p> <p>By focusing on ‘food as consumed’, the revision strengthens consumer protection, as it reflects the final form of the product that individuals are consuming, accounting for any changes that may occur during preparation or serving. Saudi Arabia believes this approach is critical for ensuring accurate labeling and maintaining high standards of food safety</p>	Saudi Arabia
<p>4.2.1.7 El sulfito, cuando esté presente en concentraciones de 10 mg/kg o más⁸ en un alimento [tal como se ofrece al consumidor/tal como se consumeconsumidor/], se declarará siempre utilizando el nombre especificado “sulfito” además del nombre del ingrediente o como parte de él.</p> <p>Costa Rica apoya el texto: “tal como se ofrece al consumidor”.</p>	Costa Rica
<p>4.2.1.7 El sulfito, cuando está presente en concentraciones de 10 mg/kg o más en un alimento [tal como se ofrece al consumidor/tal como se consume], siempre se deberá declarar utilizando el nombre especificado "sulfito" o "sulfito" además del nombre del ingrediente o como parte de él. Para los alimentos que deben ser reconstituidos para su consumo, cuando el sulfito esté presente en concentraciones de 10mg/kg o más en el alimento reconstituido bajo las instrucciones de preparación del fabricante, deberá ser declarado”</p>	Guatemala
<p>4.2.1.7 Estamos de acuerdo con incluir el texto entre corchetes, considerando que el alimento tal como se consume es la fase del ciclo alimentario que impacta directamente al consumidor, lo esperado es analizar la concentración de sulfito en este punto.</p>	Colombia
<p>4.2.1.7 Argentina desea reiterar la necesidad de hacer referencia a “en el alimento tal como se ofrece al consumidor”.</p> <p>De todas formas, no hay objeciones particulares al texto propuesto, incluidos los textos propuestos entre corchetes, considerando que el etiquetado de alérgenos informa a los consumidores sobre las concentraciones relevantes de sustancias potencialmente nocivas. Considerando que los alimentos tal como se consumen, o como se propone consumir, son la fase del ciclo alimentario que impacta directamente al consumidor, analizar la concentración de sulfito en esta fase sería la medida aplicable para ajustarse al propósito de salud.</p>	Argentina
<p>4.2.1.7 Uruguay considera mas adecuado el texto: "alimentos tal como se ofrecen al consumidor"</p>	Uruguay
<p>4.2.1.7 El país está de acuerdo con la utilización de la frase: “alimentos tal como se ofrecen al consumidor”.</p>	Ecuador
<p><u>Sulphite measured as the total concentration of sulphur dioxide (SO₂) and sulphur dioxide equivalents(SO₂) equivalent basis.</u></p> <p>As shared above under 4.2.1.7, we suggest these edits to avoid confusion.</p>	ICBA
<p>RENUMBER existing sections 4.2.1.5 and 4.2.1.6 to 4.2.1.8 and 4.2.1.9 respectively.</p> <p>Cross-reference numbers to other sections should be carefully cross-checked in the final document to be appended in the CCFL48 report.</p> <p>ICGA further recommends a thorough consistency check with all the remaining and unmodified sections of CXS 1, ideally in the circular letter seeking comments at Step 8 in advance to the final approval of the amendment by CAC. Some sections amended by the</p>	ICGA

current amendment (e.g., 4.2.3.1) contain also other unmodified text (Table), which should duly be retained in the forthcoming CXS 1 revised version, when published (after its CAC adoption).	
4.2.2 The EU supports the proposed revision of paragraph 4.2.2.	European Union
4.2.2 ISDI challenges the need to keep Principle 4.2.2 since the presence of foods and ingredients listed in sections 4.2.1.4 and where applicable 4.2.1.5 requires labelling of their specified name(s) as per Principles 4.2.1.4 and 4.2.1.5. It is the presence of foods and ingredients listed in sections 4.2.1.4 and where applicable 4.2.1.5 that determines the need for labelling, not the way they are obtained.	International Special Dietary Food Industries
4.2.3 The EU supports the proposed changes made in this section.	European Union
4.2.3 FIA supports the proposed revision.	Food Industry Asia
4.2.3 Canada believes that 4.2.3, as written, could mean that food and ingredients listed in sections 4.2.1.4, 4.2.1.7 and 4.2.1.5 do not have to be declared in accordance with section 4.1, because of the word “except” at the start. Canada suggests the following changes for the wording of Section 4.2.3 : 4.2.3 Foods and ingredients as listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 must be declared using the specified name in addition to or as part of the ingredient name. All ingredients in the list of ingredients shall be declared in accordance with the provisions set out in Section 4.1 (Name of the Food) except that:	Canada
4.2.3 ISDI supports the proposed definition 4.2.3, as the removal of the term ‘specific name’ provides distinction from ‘specified name’. “4.2.3 Except for those foods and ingredients as listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 that must be declared using the specified name in addition to or as part of the ingredient name, ingredients in the list of ingredients shall be declared in accordance with the provisions set out in Section 4.1 (Name of the Food) except that:”	International Special Dietary Food Industries
4.2.3 IDF supports the proposed wording of this section	IDF/FIL
4.2.3.1 We recommend the inclusion of the words “the food/ingredient” in the second sentence (When a class name is used for foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 the food/ingredient shall be declared using the specified name in addition to or as part of the class name.	International Association of Consumer Food Organizations
4.2.3.1 We identify two slight inaccuracies in this section: 1) In the first sentence, the note that ‘the following class names may be used’ gives the impression that the list of class names will follow, yet it does not. 2) In the second sentence the subject is missing. Perhaps the right version would be the following: ‘When a class name is used for foods and ingredients listed in, THESE FOODS AND INGREDIENTS shall be declared using the specific name in addition to or as part of the class name’	European Federation of Allergy and Airways Diseases Patients’ Associations
4.2.3.1 The EU supports the proposed changes made in this section.	European Union

<p>4.2.3.1 FIA observes that there is an error in CX/FL 24/48/5 (Part A), specifically in the last sentence of section 4.2.3.1, The section appears on both page 8 and page 12 with minor variations highlighted. FIA believes that the version on page 8 is accurate and supports its adoption.</p> <p>On page 8, the text is:</p> <p>4.2.3.1 ... When a class name is used, those foods and ingredients....</p> <p>On page 12, the text is:</p> <p>4.2.3.1: ... When a class name is used for foods and ingredients...</p>	<p>Food Industry Asia</p>
<p>4.2.3.1 Unless a general class name would be more informative, the following class names may be used. In all cases, the food and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared using the specified names listed in those sections. When a class name is used for foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared using the specified name shall be declared in addition to or as part of the class name.</p> <p>Canada proposes the following modification for this sentence in the interests of clarity.</p>	<p>Canada</p>
<p>4.2.3.1 ISDI supports the proposed Principle 4.2.3.1 (version shown on page 8 of CX/FL/48/5 (Part A) Appendix I (as shown above). It makes explicit that specified names are required when a class name is used.</p>	<p>International Special Dietary Food Industries</p>
<p>4.2.3.1 It seems that there are some wording discrepancies between the proposal made on page 8, and the one made on page 12 of CX/FL 24/48/5 (Part A) Appendix I. It seems ISDI that the correct and complete version is found on page 8, with the clean version reading:</p> <p>“4.2.3.1 Unless a general class name would be more informative, the following class names may be used. When a class name is used, those foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared using the specified name in addition to or as part of the class name.”</p>	<p>International Special Dietary Food Industries</p>
<p>4.2.3.1 IDF supports the proposed wording of this section</p>	<p>IDF/FIL</p>
<p>4.2.4.2 We believe that it is crucial that allergen labelling should be based on presence in the final product as opposed to usage.</p>	<p>FIVS</p>
<p>8. PRESENTATION OF MANDATORY INFORMATION</p>	
<p>The United States supports section 8 with the exception of provision 8.3.1.</p>	<p>USA</p>
<p>ALAIAB apoya el texto revisado de las secciones 8.3.1, 8.3.2 y 8.3.2.1 porque permite flexibilidad.</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>Our members support the amendments to section 8.3 as outlined above and specifically 8.3.3. Revisions on 8.3.2 and 8.3.2.1 maintain a flexible approach that considers the different options already used globally, facilitating compliance.</p>	<p>International Confectionery Association</p>

FIA supports the proposed text.	Food Industry Asia
El país está de acuerdo con los textos de las secciones 8.3.1, 8.3.2 y 8.3.2.1	Ecuador
8.3 Declaration of certain foods and ingredients Jamaica supports the emphasizing of ingredients causing hypersensitivity and allergenic reactions directly in the ingredient list as per point 8.3.1. However, we do not recommend any additional statement in close proximity of the ingredient list as referred in point 8.3.2 "In addition to the list of ingredients, the foods and ingredients listed in section 4.2.1.4 may be declared in a separate statement and placed in close proximity to the list of ingredients" as this might be a source of error by duplicating the information. Since this is food safety information, the usage of "close proximity" is not clear enough and could be overlooked by the consumers.	Jamaica
8.3 Declaration of certain foods and ingredients ICGA supports the amendments to section 8.3, as outlined.	ICGA
8.3 Declaration of certain foods and ingredients India supports the revised text in this section as it brings in more clarity	India
8.3 Declaration of certain foods and ingredients SA position and rationale: <ul style="list-style-type: none"> • South Africa supports the proposed text for sections 8.3 in its entirety as it aligns with the allergen labelling provisions included in both the current and draft food labelling Regulations of South Africa. Such provisions will allow consumers to make safe choices when purchasing foods. 	South Africa
8.3 Declaration of certain foods and ingredients 8.3.1 - New Zealand supports the proposed text for 8.3.1 that clarifies that it is the specified name that should contrast distinctly from the surrounding text. 8.3.2 and 8.3.2.1 - New Zealand can support the text proposed as a compromise to accommodate the practices already in place in different countries and regions, in the interest of progressing the work. 8.3.2 The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or in a separate statement or in both. 8.3.2.1 If used the separate statement shall commence with the word 'Contains' (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present. 8.3.3 - New Zealand can support this text. However, we consider this would be improved if the words 'such as' were removed. This would require a summary statement in accordance with 8.3.2.1 where a food is exempt from declaring an ingredients list. This would ensure the allergens are always declared following the word "contains" (or equivalent word) and using the specified names. 8.3.3 and 8.3.4 – New Zealand questions whether the text should be changed to align with clauses 8.3.1 and 8.3.2 which clarify that it is the specified name that should be listed in the separate statement and as part of or in conjunction with the name of the food respectively. The following edits are proposed for consideration: 8.3.3 Where a food is exempt from declaring a list of ingredients, the specified names for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared, such as in a separate statement made in accordance with section 8.3.2.1. 8.3.4 For single ingredient foods, section 8.3.3 does not apply where the specified names for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 are declared as part of, or in conjunction with, the name of the food	New Zealand

8.3 Declaration of certain foods and ingredients Uganda is in agreement with the proposed texts as its aligns with the GSLPF	Uganda
8.3 Declaration of certain foods and ingredients Egypt supports the Declaration of certain foods and ingredients and specifically the revised text for sections 8.3.1, 8.3.2 and 8.3.2.1 as they provide clarity and allow for flexibility.	Egypt
<p>8.3 Declaration of certain foods and ingredients FoodDrinkEurope supports the revision to section 8.3.1. Information on allergens, which relevant declaration refers to the specified name as the applicable and recognized allergen name to the consumer, should always be easily distinguishable from the surrounding text. This can be achieved through methods such as font size, font type, color, or additional statements.</p> <p>FoodDrinkEurope does not support the revision to sections 8.3.2 and 8.3.2.1. FoodDrinkEurope does not support the addition of allergens in a separate statement as this may trigger an increase of food labelling mistakes and consequently the food safety aspect might not be ensured for the consumer anymore. Furthermore, the addition of a summary statement may also compromise the legibility of the labels, especially for small packs.</p>	FoodDrinkEurope
<p>8.3 Declaration of certain foods and ingredients Saudi Arabia supports the proposed revised text for Sections 8.3.1, 8.3.2, and 8.3.2.1 regarding the declaration of certain foods and ingredients. These revisions provide clarity and consistency in labeling practices, ensuring consumers have access to essential information about food content.</p> <p>However, Saudi Arabia requests the following amendment to Section 8.3.2:</p> <p>“The specified name for the foods and ingredients in Sections 4.2.1.4, 4.2.1.7, and, where applicable, 4.2.1.5 shall be declared in the list of ingredients or in a separate statement or in both, as determined by national competent authorities.”</p> <p>This amendment would allow flexibility in how these declarations are made, accommodating national requirements while ensuring consumers receive the necessary information to make informed choices.</p>	Saudi Arabia
8.3 Declaración de determinados alimentos e ingredientes Costa Rica apoya la redacción propuesta	Costa Rica
8.3 Declaración de determinados alimentos e ingredientes Guatemala indica que está de acuerdo con las secciones 8.3.1, 8.3.2 y 8.3.2.1	Guatemala
8.3 Declaración de determinados alimentos e ingredientes Estamos de acuerdo con el texto revisado en la sección 8.3.	Colombia
<p>8.3 Declaración de determinados alimentos e ingredientes Se está de acuerdo con resaltar el texto y por separado del resto de lo declarado; de acuerdo con la palabra “contiene”. No se encuentran objeciones a los textos revisados propuestos. La información sobre los alérgenos siempre debe distinguirse fácilmente del texto circundante. Las revisiones de 8.3.2 y 8.3.2.1 mantienen un enfoque flexible que contempla las diferentes opciones que ya se utilizan a nivel mundial (por ejemplo, UE, EE. UU., Brasil, Australia/Nueva Zelanda), facilitando el cumplimiento.</p>	Argentina
<p>8.3.1 The specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared so as to contrast distinctly from the surrounding text such as through the [in a manner which is clear and apparent]. The use of font type, style or colourcolour [may be considered]. The United States believes 8.3.1 as proposed is overly prescriptive for the objective of the provision, which is to assure that allergens are declared in such a way that they are clear and apparent to the allergenic consumer. The United States suggests the following edit to ensure that guidance is focused on the most important requirement (i.e., that declaration of allergenic foods is clear and apparent):</p>	USA

8.3.1 The specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared [in a manner which is clear and apparent]. The use of font type, style or colour [may be considered].	
8.3.1 As for 8.3.1, Japan considers that “such as through the use of font type, style or colour” should be deleted because this phrase itself was the cause of the dispute whether [whenever possible] is needed or not. These are just examples of the methods to “contrast distinctly”, and there would be variety of methods including parentheses, quotation mark, square bracket, and so on, depending on the circumstances.	Japan
8.3.1 We support this revised text as written.	International Association of Consumer Food Organizations
8.3.1 EFA fully agrees with the proposed revised text.	European Federation of Allergy and Airways Diseases Patients’ Associations
8.3.1 The specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared so as to contrast distinctly from the surrounding text such as through the use of font type, style <u>style</u>, colour or colour <u>using separate statement</u>. We propose the addition of “or using separate statement” as another example. Since the separate statement is clearly distinguishable from the list of ingredients. The separate statement therefore need not use different font type, style or colour from surrounding text.	Thailand
8.3.1 The EU favours the proposed revised text for section 8.3.1, as it fully endorses the removal of the text ‘whenever possible’.	European Union
8.3.1 The UK is content	United Kingdom
8.3.1 Australia supports the proposed text for section 8.3.1.	Australia
8.3.1 Indonesia supports the revised text for sections 8.3.1	Indonesia
8.3.1 ISDI supports the proposed Principle 8.3.1 (see below) as it clarifies that the labelling applies to the ‘specified name’ rather than to the foods listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5. “8.3.1 The specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared so as to contrast distinctly from the surrounding text such as through the use of font type, style or colour.”	International Special Dietary Food Industries
8.3.1 IDF supports this proposed wording	IDF/FIL
8.3.1 ICBA supports the revised text for section 8.3.1 as they provide clarity and allow for flexibility.	ICBA
8.3.1 Paraguay: acuerda con la propuesta de redacción	Paraguay
8.3.1 EFAD supports the correct wording of this point	The European Federation of the

	Associations of Dietitians (EFAD)
<p>8.3.2 EFA takes positive note that the declaration of mandatory information (regarding whether it will be in the list of ingredients, in a separate statement, or both) is not left at the discretion of national competent authorities.</p> <p>However, we insist that separate allergen statements must be mandatory, as a practice that would benefit all consumers combining convenience, exhaustiveness and standardisation. For EFA, this would materialise through a dedicated 'Allergen Statement', containing all relevant information related to allergens, including PAL.</p> <p>Therefore, we propose the text to be revised as follows: "The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in a separate statement or in both the list of ingredients and in a separate statement."</p>	European Federation of Allergy and Airways Diseases Patients' Associations
<p>8.3.2 We support this revised text as written.</p>	International Association of Consumer Food Organizations
<p>8.3.2 The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or in a separate statement or in both <u>both as determined by regional or national competent authorities</u>.</p> <p>The EU disagrees with the deletion of the reference to national competent authorities in section 8.3.2. It is the responsibility of regional or national competent authorities to decide on and determine the most appropriate means of declaring the specified names for the foods and ingredients in sections 4.2.1.4, 4.2.1.7, and, where applicable, 4.2.1.5. This should be explicitly stated in the text for sake of clarity.</p>	European Union
<p>8.3.2 The UK is content</p>	United Kingdom
<p>8.3.2 Australia can support the text proposed for sections 8.3.2 and 8.3.2.1 noting this was a compromise approach to provide flexibility for national/regional authorities to determine the most appropriate approach for declaring allergens for their respective population.</p>	Australia
<p>8.3.2 The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or and in a separate statement or in both <u>statement</u>.</p> <p>Indonesia supports the revised text for sections 8.3.2 and 8.3.2.1, with slight modifications</p>	Indonesia
<p>8.3.2 ISDI supports the amendment which clarifies that the labelling applies to the 'specified name' rather than to the foods listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5.</p> <p>ISDI regrets that no agreement could be reached for the labelling of the specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5, to be declared at least in the ingredient list. ISDI believes that such requirement would have helped sensitive consumers to find this vital information in a consistent way on food labels worldwide.</p> <p>Agreeing that compromise must be found, ISDI agrees to support the proposed section 8.3.2 as proposed by the EWG and shown below.</p>	International Special Dietary Food Industries

<p>“8.3.2 The specified name for the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared in the list of ingredients or in a separate statement or in both.”</p>	
<p>8.3.2 We can support the simplified text.</p> <p>We agree that there is no need for section 8.3.2.1 to include the sentence:</p> <p>“The statement must declare the specified names of all the foods and ingredients which are declared in the list of ingredients as applicable in accordance with section 8.3.1.”</p> <p>This is already captured by section 8.3.2 (in terms of requiring the specified names being declared) and section 8.3.1 already applies to declaration of specified names without this text.</p> <p>We assume the intention of the phrase “which are declared in the list of ingredients” in the CP2 version of section 8.3.2.1 was to require that the separate statement includes the same specified names as in the ingredients list if the specified names are listed in both i.e. there is consistency between the ingredients list and the separate statement. However, we think section 8.3.2 already has the same effect.</p>	<p>IDF/FIL</p>
<p>8.3.2 ICBA supports the revised text for section 8.3.2 as they provide clarity and allow for flexibility.</p>	<p>ICBA</p>
<p>8.3.2 Paraguay: coincide con la propuesta de redacción</p>	<p>Paraguay</p>
<p>8.3.2 EFAD supports the correct wording of this point</p>	<p>The European Federation of the Associations of Dietitians (EFAD)</p>
<p>8.3.2.1 Yes, ICGMA believes the text is ready for final adoption at Step 8 provided that section 4.2.1.7 does not include the addition of “as consumed”.</p>	<p>ICGMA</p>
<p>8.3.2.1 ICGMA agrees with the latest text proposed as allows for the option to accommodate whether allergens are declared by the specified name within the ingredient list, included on a separate allergen statement or in both.</p>	<p>ICGMA</p>
<p>8.3.2.1 EFA firmly believes that that the separate statement on allergens must be single, consistent, and easy to find.</p> <p>In line with the previous consultation, EFA strongly urges for the removal of ‘(or equivalent word)’, considering that the harmonised use of a single word such as ‘Contains’ provides for safety and equal implementation.</p> <p>Moreover, we reiterate that the separate statement should be placed ‘directly under’ to the list of ingredients, and therefore the text ‘in close proximity to’ must be removed from the revised version. We consider that ‘in close proximity’ is too vague and might prove difficult in cases of big packaging.</p> <p>In this light, and in line with our long-standing support in making separate statements mandatory, we propose the text to be revised as follows: ‘The separate statement shall commence with the word ‘Contains’ and be placed directly under the list of ingredients when present.’</p>	<p>European Federation of Allergy and Airways Diseases Patients’ Associations</p>
<p>8.3.2.1 We support this revised text as written.</p>	<p>International Association of</p>

	Consumer Food Organizations
8.3.2.1 The EU agrees with section 8.3.2.1.	European Union
<p>8.3.2.1 If used the separate statement shall commence with the word ‘Contains’ (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present.</p> <p>We propose the addition of “as applicable” for flexibility. In some cases, the list of ingredient is long or presented in multiple languages, it may not be feasible to display the separate statement directly under the ingredient list.</p>	Thailand
8.3.2.1.1 The UK is content	United Kingdom
<p>8.3.2.1 If used the separate statement shall commence with the word ‘Contains’ (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present. 8.3.2.2 If the separate statement is used on the label, the specified name for each of the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 that are present in the food must appear in the statement even if that specified name is already shown in the list of ingredients.</p> <p>Canada believes that there should be a requirement for the Contains statement to be complete for all allergens present in the product even if they have already been declared in the list of ingredients, so that a product does not declare some allergens in the list of ingredients and others in the Contains statement.</p> <p>Canada proposes the following text (this could be either at the end of 8.3.2 listed separately as 8.3.2.2 : If a separate statement is used on the label, the specified name for each of the foods and ingredients in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 that are present in the food must appear in the statement even if that specified name is already shown in the list of ingredients.</p>	Canada
<p>8.3.2.1 If used the separate statement shall commence with the word ‘Contains’ (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present (when present).</p> <p>Canada suggests to add parentheses around the words “when present” at the end of the sentence to clarify that it means when the list of ingredients is present.</p>	Canada
<p>8.3.2.1 If used the The separate statement shall commence with the word ‘Contains’ (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present.</p> <p>Indonesia supports the revised text for sections 8.3.2 and 8.3.2.1, with slight modifications</p>	Indonesia
<p>8.3.2.1 ISDI supports the amended Principle 8.3.2.1 as proposed below as it introduces some flexibility for the placement of the separate statement.</p> <p>“8.3.2.1 If used the separate statement shall commence with the word ‘Contains’ (or equivalent word) and be placed directly under or in close proximity to the list of ingredients when present.”</p>	International Special Dietary Food Industries
8.3.2.1 ICBA supports the revised text for section 8.3.2.1 as they provide clarity and allow for flexibility.	ICBA
8.3.2.1 Paraguay: si bien coincidimos con la propuesta, no obstante seria conveniente analizar de dar un mayor énfasis cuando la declaración se realiza seguido de la lista de ingredientes	Paraguay

8.3.2.1 EFAD supports the correct wording of this point	The European Federation of the Associations of Dietitians (EFAD)
8.3.2.1 e) Si el texto está listo para avanzar al trámite 8. De acuerdo.	Colombia
<p>8.3.2.1 Si se utiliza, la declaración separada comenzará con el término "Contiene" (o un término equivalente) y se colocará directamente debajo o muy cerca <u>a continuación</u> de la lista de ingredientes, cuando esté presente.</p> <p>Uruguay propone sustituir "muy cerca" por "a continuación" para mayor claridad de la ubicación.</p>	Uruguay
8.3.3 Given EFA's support for a mandatory, single and consistent 'Allergen Statement', EFA calls for the removal of 'such as', as it introduces potential statements that can create confusion among consumers.	European Federation of Allergy and Airways Diseases Patients' Associations
<p>8.3.3 Where a food is exempt from declaring a list of ingredients, <u>the specified name for the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared, such as in a</u>the <u>separate statement made in accordance with section 8.3.2.1.</u></p> <p>Regarding sections 8.3.3 and 8.3.4, the EU believes that the notion of declaring the specified names for the foods and ingredients in sections 4.2.1.4, 4.2.1.7, and, where applicable, 4.2.1.5 has been overlooked. Therefore, the EU suggests that these paragraphs be reworded as follows:</p>	European Union
<p>8.3.3 Where a food is exempt from declaring a list of ingredients, <u>and no list of ingredients in voluntarily provided,</u> the foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 shall be declared, such as in a separate statement made in accordance with section 8.3.2.1.</p> <p>Canada notes that there may be circumstances where a food is exempt from having to provide a list of ingredients but chooses to put one on the label anyway, in which case a separate statement is not required. Where no list of ingredients is voluntarily provided then the separate statement must appear. Canada is unclear about the purpose of the words "such as" and suggests removing them. Canada suggests the following modifications to 8.3.3.</p>	Canada
8.3.4 For single ingredient foods, section 8.3.3 does not apply where <u>the specified name for</u> foods and ingredients listed in sections 4.2.1.4, 4.2.1.7 and where applicable 4.2.1.5 are declared as part of, or in conjunction with, the name of the food.	European Union
8.3.4 Se considera que el documento podría pasar al trámite 8.	Argentina