



**GFORSS** | GLOBAL FOOD REGULATORY  
SCIENCE SOCIETY

## ANALYSIS OF AGENDA ITEMS AND PREPARATION FOR THE 46<sup>th</sup> SESSION OF THE CODEX COMMITTEE ON FOOD LABELLING (CCFL46)

*27 Sept – 07 October 2021 Virtual Meeting*

### **AGENDA ITEM 8: Food Allergen Labelling**

#### Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 46th session of the Codex Committee on Food Labeling, scheduled to take place virtually from 27 September to 07<sup>th</sup> October, 2021. The document is intended for possible use by the Codex communities of practice promoted by [GFORSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GFORSS](#)), their membership or their management.

This analysis is prepared as part of the **Codex Initiative for the Middle East and North Africa: MENA Codex Initiative**, implemented by [PARERA](#) and [GFORSS](#) and funded by the US Codex Office, US Department of Agriculture.

This analysis has identified that the most relevant agenda items are agenda items 5, 6 and 8 where progress would be desired.

#### Agenda Item 8: Food Allergen Labelling

##### *8.1: Proposed draft revision to the General Standard for the Labelling of Prepackaged Foods – Provisions relevant to allergen labelling*

#### Documents

- ❖ [CX/FL 21/46/8](#) - Allergen labelling: proposed draft revisions to the GSLPF and guidance of precautionary allergen labelling
- ❖ [CX/FL 21/46/8-Add.1](#) - Comments in reply to [CL 2021/21/OCS-FL](#)

*\*It is important to note that experts – members of the Expert Working Group (EWG) – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the EWG proceedings is based on each expert's own credentials and experience which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

### Background

New work was initiated at CCFL45 to review the provisions related to food allergen labelling with the intent to develop guidance on precautionary allergen labelling. The eWG was chaired by Australia, co-chaired by the UK and the US. The Committee requested scientific advice from JECFA on the list of Priority Allergens and the way to handle situations of highly processed oils where protein have been removed from a labelling stand point.

In parallel, some work was also conducted by CCFH and led to the adoption of a Code of practice on Allergen Management.

### Considerations

- *JECFA completed its scientific evaluation and proposed an update to the list of priority allergens.*
- *The priority list in Section 4.2.1.4 has not been updated in the text to reflect the recommendations of the FAO/WHO joint expert consultation. Discussion of updating the priority list in Section 4.2.1.4 should be started during the plenary session of CCFL46.*
- *There may be an interest to focus allergen declaration in a “contains statement” as opposed to having allergens simply included in the list of ingredients (in line with consumer research findings).*
- *It may be important to separate this work (on updating the food allergen labelling standard) for ingredients from the current activities under way related to guidance on precautionary statement.*

## Agenda Item 8: Food Allergen Labelling

### 8.2: Proposed draft Guidance on Precautionary Allergen Labelling

#### Documents

- ❖ [CX/FL 21/46/8](#) - Allergen labelling: proposed draft revisions to the General Standard for the Labelling of Prepackaged Food (GSLPF, CXS 1-1985) and guidance of precautionary allergen labelling
- ❖ [CX/FL 21/46/8-Add.2](#) - Comments in reply to [CL 2021/21/OCS-FL](#)

### Considerations

- *The summary report of the FAO/WHO consultation on allergen thresholds has recently been released; however, the final FAO/WHO scientific consultation on PAL statements is not scheduled until October 2021 and a report would not be expected until 2022.*
- *As threshold guidelines have not previously been discussed and debated within either CCFL or CCFH, it may be difficult to translate the current advice into clear labeling guidelines, at this stage.*
- *It may be advised that the work on PAL proceed subsequent to the work of allergen disclosure for deliberately added ingredients.*

