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GLOBAL FOOD REGULATORY
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Proposed Analysis of Key Agenda Items of the 47th Session of the Codex Committee on Food Labelling (CCFL47)

15-19 May 2023, Gatineau, Québec, Canada

Key Agenda Items of Interest

Agenda Item 5: The Proposed **Draft Guidance on Food Labelling** – which includes both an update to the General Standard on Labelling of Prepackaged Foods (GSLPF) on priority allergen labelling and guidance on Precautionary Allergen Labelling (PAL)

Agenda Item 6: The Proposed **Draft Guidelines on the provision of Food Information for Prepackaged Foods Offered via E-Commerce**

Agenda Item 7: The Proposed **Draft Guidelines on the Use of Technology to Provide Food Information**: Amendment of the General Standard for the Labelling of Prepackaged Food

Agenda Item 10: Discussion Paper on **Food Labelling Exemptions in Emergencies**



Agenda Item 4



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Agenda Item 5: Proposed Draft Guidance on Food Allergen Labelling

Document: CX/FL 23/47/5

Status in Codex Step Process: Step 3

Main Considerations – Revision to the GSLPF

- ❑ Update of the List of what is known to be Priority Allergens
- ❑ The list of **the new big eight** are protein containing ingredients and that allergic reactions are related to exposure to the protein fraction of these ingredients:
 - Protein Presence should be the trigger of mandatory declaration
 - Need to identify that the labelling here covers deliberately added ingredients containing an allergen as defined
- ❑ To account for these considerations, a proposed wording for Section 4.2.1.4 could be as follows:

“The following foods and ingredients are known to cause hypersensitivity: food allergy or coeliac disease **when any protein fraction of these foods and ingredients is present as a result of deliberate addition to the food (composition),** and shall, **as result of such presence,** always be declared using the name specified”
- ❑ Discussion of Food Allergen of Regional Relevance

Main Considerations – Guidance on PAL

- ❑ Mandating PAL when all measures of prevention of allergen cross-contact are exhausted
- ❑ Ensuring PAL is used as a result of a risk assessment
- ❑ Discussing the way Reference Doses ought to be used
- ❑ Proposed Change to Principle 4.2

“PAL shall only be used if the presence of a protein from an allergen is equal to or above the action level for this allergen, **which is defined as:**

Action level (mg total protein from the allergen / kg food) = Reference dose (mg total protein from the allergen) / Amount of the food (kg)

The reference dose may be chosen from the listed reference dose values in 4.3.1 or be developed by national jurisdictions based on their own risk assessments.

Should the Reference Dose chosen by a given competent authority be different from the listed values in 4.3.1, it would need to be disclosed and made available to industry and consumers, with the relevant justification.”

□ Possible Consideration of:

- Reliance on Qualitative Risk Assessment (not only Quantitative Risk Assessment as a condition for PAL)
- Allergen Method Validation / Sampling Plans (Advice from CCMAS)

Major Progress Made on this Text – High Expectation from food allergic consumers

Agenda Item 5



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Agenda Item 6: Draft Guidelines on the provision of Food Information for Prepackaged Foods Offered via E-Commerce

Document: CX/FL 23/47/6

Status in Codex Step Process: Step 3

Analysis and Considerations

- ❑ It is important that the work on this text such as the definition of “food information” aligns with the draft Guidelines on the Use of Technology to Provide Food Information, under preparation.
- ❑ These guidelines are meant to lead to a set of requirements for information to be provided to consumers shopping for food online, which must be comparable to the information provided or accessible when shopping in a physical store.à
- ❑ Several items **for which no consensus was achieved** at the EWG are referred to be dealt with, **at the national legislation level**. This may negate the value of the text to drive harmonization of food regulatory decisions pertaining to food labelling globally.

Given that there were limited discussions on this item at previous plenary settings of CCFL, it will be important that enough time is devoted to reach consensus on key considerations proposed by this text.

Agenda Item 6



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Agenda Item 7: Proposed draft Guidelines on the Use of Technology to Provide Food Information: Amendments to the General Standard for the Labelling of Prepackaged Foods

Document: CX/FL 23/47/7

Status in Codex Step Process: Step 3

- ❑ It is important to have a harmonized definition of **“food information”** between the work streams for the Use of Technology to Provide Food Information and E-Commerce / Internet Sales.
- ❑ **Sections 4(1) and 4(2) of the draft guidelines** seem to cover well the intent of item 2(a) in the Project Document to prevent false and misleading food information. As a result, there is no need to consider revisions to the GSLPF, upon inclusion of these sections in the draft guidelines.

- ❑ Although this item is being discussed for the first time at CCFL47. There does not seem to be polarising issues around it.
- ❑ It is therefore possible for this item to move forward in the step process if discussions at plenary would support consensus on the draft.

Other Agenda Items



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Agenda Item 10: Discussion Paper on Labelling Exemptions in Emergency Situations

Document: **CX/FL 23/47/10**

- New Work on Labelling Exemptions in Emergency Situations Seems to be Well Supported
- New Work on Sustainability Claims : More Divided Positions
- Input Sought from Codex Delegations South East Asia ?

Looking Forward to Seeing you at this Event



Hybrid Event IN-PERSON & ONLINE
17 May 2023 • 12.30-13.30 (AEST)

**FOOD ALLERGEN MANAGEMENT
FOR FOOD MANUFACTURERS**

Canadian Multi-Stakeholder Approach to Develop Consensus Guidance

