



49th Joint Coordination Meeting of Arab and CCNE Codex Contact Points

**PREPARATION FOR THE 49th SESSION OF THE
CODEX ALIMENTARIUS COMMITTEE ON FOOD LABELLING
(CCFL49)**

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Guidelines on the Application of Food Labelling Provisions in Emergencies – ITEM 7

What Are These Guidelines?

Agenda Item 7 — CX/FL 26/49/7 — CCFL49, Ottawa, 11–15 May 2026

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The Problem

Emergencies (pandemics, conflict, disasters) disrupt food supply chains, making it impossible to meet standard labelling rules — e.g. sourcing from an unlisted country, inability to print in a specific language.

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The Solution

CCFL is building a framework allowing competent authorities (governments) to grant temporary, risk-based labelling 'flexibilities' — keeping food moving without compromising safety.

✓

Current Status

Document CX/FL 26/49/7 at Step 4/7 — advanced draft under discussion at CCFL49. Work initiated Feb 2025, led by the United States.

Scope of Application

- Prepacked foods
- Non-retail containers of food
- Any emergency that disrupts the food supply chain
- Applies to both importing AND exporting countries

Why It Matters for the Region

- Arab & CCNE countries are heavily import-dependent
- Region faces recurring conflict, climate disasters, displacement
- Large vulnerable populations: infants, refugees, food-insecure

What the Draft Guidelines Say

Key provisions of CX/FL 26/49/7

Risk-Based Approach

Sections 3.1.3 & 3.1.5

Food safety always prevails. Flexibilities cannot waive allergen or hypersensitivity protections.

Temporary Only

Sections 2.1.2 & 5

Measures are exceptional and temporary. Emergency cannot be used as a loophole to permanently lower standards.

Trade Equity

Section 3.1.5

Flexibilities must not give undue competitive advantage to one food business operator over another.

Import/Export Dynamics

Section 4.1.1

The importing country must agree before the food is shipped — protecting sovereign rights over domestic markets.

Digital Integration

Section 3.1.9

References CXG 105-2024: QR codes and digital links can replace info that cannot be printed during an emergency.

Analysis: Strengths & Concerns for the Region

Arab & CCNE countries — key observations

✓ Strengths

- ❖ Risk-based approach (§3.1.3 & §3.1.5): food safety explicitly prioritised over logistics
- ❖ Temporary nature (§2.1.2 & §5): cannot be used to permanently lower standards
- ❖ Trade equity (§3.1.5): no undue competitive advantage for any operator
- ❖ Import/export protection (§4.1.1): importing country must consent before shipment
- ❖ Digital integration (§3.1.9): QR codes/digital links permitted to carry missing info

⚠ Concerns

- 'Significant disruption' (§2.1.2) is vague — minor delays could be misused to bypass labelling laws
- Language requirements (§2.1.3): safety-critical info (allergens, expiry) must remain in Arabic even if via stickers or digital means
- Digital tools (§3.1.9) are not viable during power outages — common in conflict/disaster zones
- No explicit minimum info floor — what MUST appear on every emergency label? (Date, product name, allergens)
- Traceability at risk: relaxed labelling complicates recall operations for contaminated products

6 Recommendations for Arab & CCNE Countries

Proposed positions and amendments to advocate at CCFL49

1. Support the Draft

Advance the guidelines as a structured, internationally recognised framework for managing food shortages during crises.

2. Define 'Disruption'

Request clarity on 'significant disruption' (§2.1.2) to prevent minor logistical delays from bypassing labelling laws.

3. Protect Language Rights

Safety-critical info (allergens, expiry dates) must be accessible in Arabic — via stickers or digital means — at minimum.

4. Mandate INFOSAN Use

Require mandatory INFOSAN notifications (§4.1.3) so Arab regulators know in real-time when emergency-labelled products enter their borders.

5. Clarify Stock-in-Trade Rules

Request guidance on how long emergency-labelled products can remain on shelves after the emergency ends (§5.1.2).

6. Set a Minimum Info Floor

Clarify exactly what information is always required: date, product name, allergens — non-negotiable regardless of emergency level.

Suggested Regional Position at CCFL49

Arab & CCNE countries — bottom line

✓ Support the advancement of the guidelines — with targeted amendments

Must-Have Amendments

- Define 'significant disruption' precisely
- Set minimum mandatory info floor (name, date, allergens)
- Require Arabic for safety-critical info

Process Advocacy

- Mandate INFOSAN real-time notification
- Clarify stock-in-trade shelf-life after emergency ends
- Require post-emergency evaluation reports

Watch-Points

- QR codes not viable in power-cut zones
- Monitor scope creep: temporary ≠ permanent
- Ensure import-consent clause is enforceable

Annotations from Expert Review

points to raise at CCFL49

On Temporary Nature

“Only used during crises, not permanently” — verify that the final text has robust sunset clauses and no automatic renewal.

On Digital Tools

“Good, but not doable in crises with power plant shut” — propose that digital-only info must have a mandatory offline fallback (sticker/paper insert).

On Minimum Requirements

“Clarify exactly what infos are required: Date, product name, allergens” — push for a specific Annex listing non-waivable elements.

Bottom Line: Support — but push for precision, protection of the vulnerable, and offline fallbacks.

