



South West Pacific Codex Capacity Building Meeting

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

Presented by
Prof. Samuel Godefroy & Dr. Amine Kassouf
GFORSS

May 6, 2026

CODEX COMMITTEE
ON FOOD LABELLING
Forty-ninth Session
Ottawa, Canada
11-15 May 2026



Item	Subject	Document
	Opening of the session	
1	Adoption of the agenda	CX/FL 26/49/1
2	Matters referred by the Codex Alimentarius Commission and/or its subsidiary bodies	CX/FL 26/49/2
2.1	The use of "country of harvest" in addition to the mandatory declaration of country of origin in food labelling of spices	CX/FL 26/49/2 Add.1
3	Matters of interest from FAO and WHO	CX/FL 26/49/3
4	Consideration of labelling provisions in draft Codex standards (endorsement)	CX/FL 26/49/4
5	Annex to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Guidelines on the use of precautionary allergen labelling (PAL) (Step 7)	CX/FL 26/49/5
	- Comments in reply to CL 2026/7-FL	CX/FL 26/49/5 Add.1
6	Amendments to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1- 1985): Provisions relevant to joint presentation and multipack formats (Step 4)	CX/FL 26/49/6
	- Comments in reply to CL 2026/8-FL	CX/FL 26/49/6 Add.1
7	Guidelines on application of food labelling provisions in emergencies (Step 4)	CX/FL 26/49/7
	- Comments in reply to CL 2026/9-FL	CX/FL 26/49/7 Add.1
8	Future work and emerging issues	CX/FL 26/49/8
9	Other business	
10	Date and place of the next session	
11	Adoption of the report	



ITEM 2.1

Agenda item 2.1: THE USE OF “COUNTRY OF HARVEST” IN ADDITION TO THE MANDATORY DECLARATION OF COUNTRY OF ORIGIN IN FOOD LABELLING OF SPICES

CX/FL 26/49/2 Add1

Background

- **CAC 40 (2017):** the labelling provisions for 6 CCSCH draft standards (dried garlic at step 5/8) and (oregano, basil, ginger, cloves, saffron at step 5), were referred to CCFL for endorsement.
- **CCFL45 (2019):** Back to CCSCH for further consideration that the phrase “Country of Origin/Country of Harvest” was not clear, whether both should be declared or only one was required.
- **CCSCH5 (2021):**
 - Forward 5 standards (oregano, ginger, basil, nutmeg and cloves) to CAC for adoption at Step 8, and to CCFL46 (2021) for endorsement, with “Country of Origin” being mandatory and “Country of Harvest” being optional.
 - Saffron standard returned to Step 6 for further discussion – no consensus was reached.

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CX/FL 26/49/2 Add1

Background

➤ **CCFL46 (2021):**

- Endorsed the labelling provisions in the 5 draft standards (oregano, ginger, cloves, basil and nutmeg) at Step 8, with “Country of Origin” being mandatory and “Country of Harvest” being optional.

➤ **CCSCH6 (2022):**

- Chair proposed that labelling provisions should remain as proposed by the EWG, and therefore the country of harvest shall be declared mandatory.
- Forwarded the standard for adoption at Step 8, and endorsement by CCFL and the Codex Committee on Methods of Analysis and Sampling (CCMAS).
- **Three delegations expressed reservations.**

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Background

➤ **CAC 45 (2022):**

- Adopted the saffron at Step 8, subject to endorsement by CCFL of the labelling provisions on country of origin and country of harvest.
- **Two members had reservations, noting that the provision for the mandatory declaration of country of harvest was contrary to the advice provided to CCSCH by CCFL.**

➤ **CCFL47 (2023):**

- For the draft standard of dried saffron. Divergent opinions were once again voiced by members on the issue of mandatory country of harvest labelling.
- Referred the labelling provisions to CCSCH for reconsideration, and to clarify the distinction between COO and COH, why the COH should be mandatory, and how such a declaration would be beneficial for fraud prevention.

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Background

➤ **CCSCH7 (2024):**

- The definition for “country of origin” as contained in (CXS 1-1985) was generally broad and applicable to all foods.
- No definition in Codex for “country of harvest”, however, the glossary of terms facilitate CCSCH work. The country of origin and the country of harvest may be the same for many herbs and spices, but these remain two different terms.

➤ **CCFL48 (2024):**

- CCFL48 was unable to reach consensus to endorse mandatory declaration of country of harvest and thus referred the matter to **CCEXEC87(2024)** and **CAC47(2024)** for consideration.

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Background

➤ CCAC47 (2025):

1. Requested the Codex Secretariat to issue a (CL) seeking potential solutions for the use of COH in food labelling of spices.
2. Established an (EWG), reporting to CCFL, to review the information gathered from comments to the CL, and discussions at CCSCH & CCFL, and CAC47, to:
 - Provide potential options which recognize Members perspectives on the use of COH in addition to the mandatory declaration of country of origin (COO) in food labelling of spices, including saffron and vanilla;
 - Review options for a definition for COH and consider how it differs from COO;
 - consider whether any clarifications are needed to the application of labelling provisions; and
 - Prepare a report for consideration of CCFL49

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Analysis


The information gathered from the specific questions posed in both the **CL and EWG** have enabled the identification of **3 key labelling issues** affecting discussions on country of harvest labelling:

- a) **Inconsistent interpretation and application of country-of-origin labelling**
- b) **Lack of specificity in Codex texts regarding blends of spices of the same type from different origins**
- c) **Interest by some Members in using labelling for marketing, based on qualities or characteristics associated with origin.**

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a) Inconsistent interpretation and application of country-of-origin labelling

- The purpose of this question was to better understand where the COO of spices and culinary herbs may differ from the COH, and used in addition to the mandatory labelling of country of origin.
- The general consensus: Given the overall agreement of EWG members on the relevance of “change in nature” to clarifying labelling provision. Based on this consensus  The EWG then proposed two options to achieve this :
 - a. CCFL developing additional guidance about what would change the nature of the food and therefore the country of origin for the purposes of labeling.
 - b. CCFL providing advice to CCSCH to support the development of guidance within its texts.

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a) Inconsistent interpretation and application of country-of-origin labelling

A general agreement emerged that in the case of saffron, the country of origin is the same as the country of harvest (+ A member proposed that this could be addressed in the dried saffron Codex standard with a footnote stating that for the purposes of labelling the country of origin is the country of harvest).

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Conclusions

- 1) CCFL is the CAC’s subsidiary body established to prepare standards and related texts on food labeling and is well placed to support commodity committees to understand food labelling in general.
- 2) All labelling information, whether mandatory or voluntary, is subject to the General Principles outlined in Section 3 of the General Standard on the Labelling of Prepackaged Foods (CXS 1-1985), which prohibits false, misleading, and deceptive labeling.
- 3) When considering the labelling of foods, it is important to understand at what point the food came into being in the form in which it is packaged and sold to consumers, as this step determines the COO for the purposes of labeling.
- 4) When the COH and the COO of a spice is the same, one statement of origin is sufficient as it avoids redundancy and potential confusion and minimizes burden on industry.

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Conclusions

- 5) When COO and COH of a spice or culinary herb are different, the country of origin is the country in which the change of nature occurred.
- 6) The meaning of COH is generally understood to be the country where a spice or culinary herb is grown and harvested. And the root issue is not the understanding of the term, but rather the implications for labelling when COO and COH are the same, and when they are not.
- 7) Products may exist in international trade that are blends of a single type of spice or culinary herb from multiple origins, packaged together.
- 8) In general, optional or voluntary statements or claims can be made on food labels, provided that such statements are not false or misleading.
- 9) Labelling provisions are established by Codex with the intent to address health and safety matters and fair practices in trade. Codex does not establish labelling requirements related to promoting food or for competitive benefit of food business operators or producing countries.

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CCFL49 is invited to:

- a. Consider referring to CCSCCH the above conclusions 1-9,
- b. Consider promoting a workshop or side session at CCSCCH on CCFL labelling texts
- c. Noting conclusion 3, consider if this information offers sufficient guidance on what constitutes a “change of nature” of a food, and therefore the country of origin for the purposes of labelling.
- d. Noting conclusion 6 that summarizes EWG members’ understanding of the meaning of country of harvest, conclude that if country of harvest is to be defined, CCFL is not the suitable Codex body to do so.
- e. Noting conclusion 7, consider exploring possible work to clarify the labelling of blends of a single spice from multiple origins. An interested Member could prepare a proposal for inclusion in the Agenda Item on Future Work. F
- f. Consider whether the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022), and if so, provide any specific text proposals.

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FL49/CRD04

Do you agree that the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022), and if so, please provide any specific text proposals.

- Yes, Australia agrees that the information gathered through the EWG can be used to finalise the Standard for Dried Floral Parts – Saffron (CXS 351-2022). Australia suggests the following text for Section 8.2 of CXS 351-2022: “Country of origin shall be declared. Country of harvest (optional). Region of harvest and year of harvest (optional).”

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FL49/CRD04

Do you agree that the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022), and if so, please provide any specific text proposals.

- Yes, Canada agrees the EWG findings are sufficient to finalize Section 8.2. The EWG highlighted member feedback that for dried saffron, country of harvest and country of origin are the same, because drying occurs immediately after harvest and no transformation occurs afterward. Therefore, one origin declaration is sufficient, and avoids redundancy and potential confusion (Conclusion 4).
- Canada could support the text proposed in the EWG by a Member Organization for Section 8.2 of CXS 342-2021 (Saffron Origin Labelling) 8.2 Country of origin and country of harvest • Country of origin shall be declared*. • Region of harvest and year of harvest (optional). *Footnote: For the purposes of this standard, the country of origin is the country of harvest.

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FL49/CRD04

Do you agree that the information gathered through the EWG can be used to finalize the provisions of Section 8.2 of the Standard for dried floral parts – saffron (CXS 351-2022), and if so, please provide any specific text proposals.

- New Zealand supports the text at Section 8.2 stating “Country of origin shall be declared”.
- We do not support stating in the Standard that declaration of COH for dried saffron is New Zealand FL49/CRD04 22 COMMENT MEMBER / OBSERVER optional, as COH would be the same as COO and stating both could cause consumer confusion.

Item 4

Agenda item 4: Consideration of labelling provisions in draft Codex standards (endorsement)

CX/FL 26/49/4 and Add.1

Analysis

The labelling provisions submitted for endorsement under this agenda item originate from multiple Codex committees, including those dealing with fresh produce, regional foods, and spices.

- **(CCFFV)** → Draft Standard for Fresh Curry Leaves
- **(CCASIA)** → Regional Standard for Quick-Frozen Dumplings
- **(CCNE)** → Regional Standard for Maamoul
→ Standard for Spices Derived from Dried or Dehydrated Fruits and Berries – Requirements for Vanilla
- **(CCSCH)** → Standard for Spices in the Form of Dried Fruits and Berries – Requirements for Large Cardamom
→ Standard for Coriander
→ Standard for Sweet Marjoram

A. CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES (CCFFV)

The draft standard for FRESH CURRY LEAVES to CAC for adoption at Step 5/8.

- the labelling provisions are straightforward and largely consistent with existing Codex standards for **fresh fruits and vegetables**.
- In addition to the requirements of the General Standard for the Labelling of Prepackaged Foods (**CXS 1-1985 and CXS 346-2021**):
 - The requirements focus primarily on **product identification** and **origin declaration**.
 - The inclusion of optional geographical information, such as region or district, reflects an increasing emphasis **on traceability and product differentiation**.
 - Also the products originate from multiple sources, which may require **clear and careful labelling to avoid consumer confusion**.

B. FAO/WHO COORDINATING COMMITTEE FOR ASIA (CCASIA)

Regional standard for QUICK-FROZEN DUMPLINGS (Asia) to CAC for adoption at Step 8.

- In addition to the requirements of the General Standards for labelling (**CXS 1-1985 and CXS 346-2021**):
 - the labelling provisions are more detailed and include specific requirements related to:
product description (raw or cooked) → important from a food safety perspective
storage conditions → importance of maintaining product integrity throughout the supply chain.

C. FAO/WHO COORDINATING COMMITTEE FOR NEAR EAST (CCNE)

Regional standard for MAAMOUL (Near East) to CAC for adoption at Step 8.

- In addition to the requirements of the General Standards for labelling (**CXS 1-1985 and CXS 346-2021**):
 - Labelling provisions are limited to basic **product identification** and **declaration of filling type**. This reflects the **traditional nature of the product** and the need to maintain clarity. The approach taken here demonstrates how Codex allows **flexibility in labelling requirements**, depending on the nature of the product.

D. CODEX COMMITTEE FOR SPICES AND CULINARY HERBS (CCSCH)

The draft standard for spices - Requirements for VANILLA, LARGE CARDAMOM, CORIANDER, and SWEET MARJORAM to CAC for adoption at Step 8.

- In addition to the requirements of the General Standards for labelling (**CXS 1-1985 and CXS 346-2021**):
 - demonstrate a high level of detail, **provisions and standardization** on the **product name and origin**. Also **optional elements** such as **trade name or scientific name, country of harvest, harvest year, and commercial classification (grade, size)**. This reflects the importance of traceability and quality differentiation in international trade of spices.

CODEX COMMITTEE ON FATS AND OILS **CCFO29 (2026)**

The draft standard for MICROBIAL OMEGA-3 OILS to CAC49 (2026) for adoption at Step 5.

- In addition to the requirements of the General Standards for labelling (**CXS 1-1985 and CXS 346-2021**):
 - Labelling requirements extend beyond basic identification to include **nutritional components** such as EPA and DHA content and the **product name** must include the source organism (genus), such as algal oil (Schizochytrium sp.). This reflects the growing importance of functional foods, particularly in the case of microbial omega-3 oils, which require more detailed information to be provided to consumers.

Overall Assessment

The labelling provisions submitted for endorsement are:

- ✓ Well aligned with Codex principles
- ✓ High degree of consistency with the General Standard for the Labelling of Prepackaged Food **(CXS 1-1985)** and the General Standard for the labelling of non-retail containers **(CXS 346-2021)**.
- ✓ Increasing the use of standardized templates, contributes positively to harmonization across standards.
- ✓ A clear trend toward increased detail and complexity can be observed (multiple optional elements), this may enhance transparency and traceability, it also raises concerns regarding practicality and enforceability (create challenges for both industry and regulatory authorities).

Recommendations

- ✓ Support endorsement of labelling provisions that align with **CXS 1-1985** and **CXS 346-2021**
- ✓ Ensure any additional provisions are clearly justified
- ✓ Promote harmonization across commodity standards
- ✓ Encourage clarity and simplicity in labelling requirements
- ✓ Avoid unnecessary duplication of existing Codex provisions

Item 5

Context and challenges : Agenda Item 5

ANNEX TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING (STEP 7)

Shift from the paradigm of "legal precaution" to "**scientific risk management**".

Three pillars: Protection of sensitive consumers, harmonization of global trade, and reduction of unjustified claims.

Scope: Exclusive focus on unintentional presence (cross-contamination) without affecting mandatory ingredient declaration.

Transition to a risk-based approach

Background



.....**Before 2020:**

- Lack of a harmonized framework for the EPA

2020:

- Adoption of the Code of Practice for Allergens (CXC 80-2020)

CCFL47–48:

- Development of EPA guidelines
- Validation of general principles

CCFL48 (2024) : Finalization of revisions to the General Standard on Prepackaged Food Labelling (GSFFL)

- The draft guidelines on the EPA have moved to stage 5 for adoption
- Adoption by the Commission and granting of an additional period to complete the work by the end of CCFL49 (2026)
- FAO/WHO Request for Scientific Advice

Background (Suite)



After adoption at step 5:

EWG : Reinstated in March 2025 under the joint presidency of the United States, Australia, and the United Kingdom. **Current Mandate:** Finalizing the texts by incorporating the scientific data from 2025.

Methodology : Use of two consultation documents (DC1 and DC2) to reach a consensus on the critical sections (**4.3, 4.3.1 and 5**):

- Section 4.3 (when to use EPA)
- Reference doses (Rd), Check the relevance of the proposed thresholds, Examine the structure of the table and its notes.
- Labeling presentation: Evaluate:
 - the new provision for products without an ingredients list,
 - the use of expressions such as "may contain",
 - the rules relating to gluten labelling.

CCFL49 (2026):

Objective: finalization (Step 8)?

Issues for discussion at the 49th session of Codex of food Labelling

- **(Section 4. 1):** Use of the term “**should**” to indicate recommendations rather than strict obligations.
- Adoption of the **Reference Intakes Table (Section 4.3.1):**
 - Inclusion of numerical values for all allergens.
 - New reference intake for gluten set at **4 mg**.
 - Recognition of wheat as both:
 - An allergen (IgE-mediated)
 - A trigger for celiac disease
 - Requirement for dual reference intakes (total protein and gluten).
- **Flexibility for National Authorities (Section 4.3.2):**

Allowing countries/regions to establish reference doses for additional hazards.
Must follow recognized scientific principles.
- Activation of **Training Programs (Section 4.4):**
 - Encouragement for authorities to organize training and awareness programs.
 - Target groups: manufacturers, health professionals, and consumers.
- Adoption of **Presentation and Display Rules (Section 5):**
 - Inclusion of Section 5.2 bis for products without an ingredient list.
 - Ensuring precautionary labeling remains clearly visible.
 - Recommendation to place precautionary labeling directly below or close to the ingredients list.

Analysis

1. Risk-Based Framework for Use of PAL (Section 4.3)

The draft provides that:

“PAL should only be used when it is demonstrated that unintended allergen presence cannot be mitigated to a level at or below the action level based on the reference doses...”

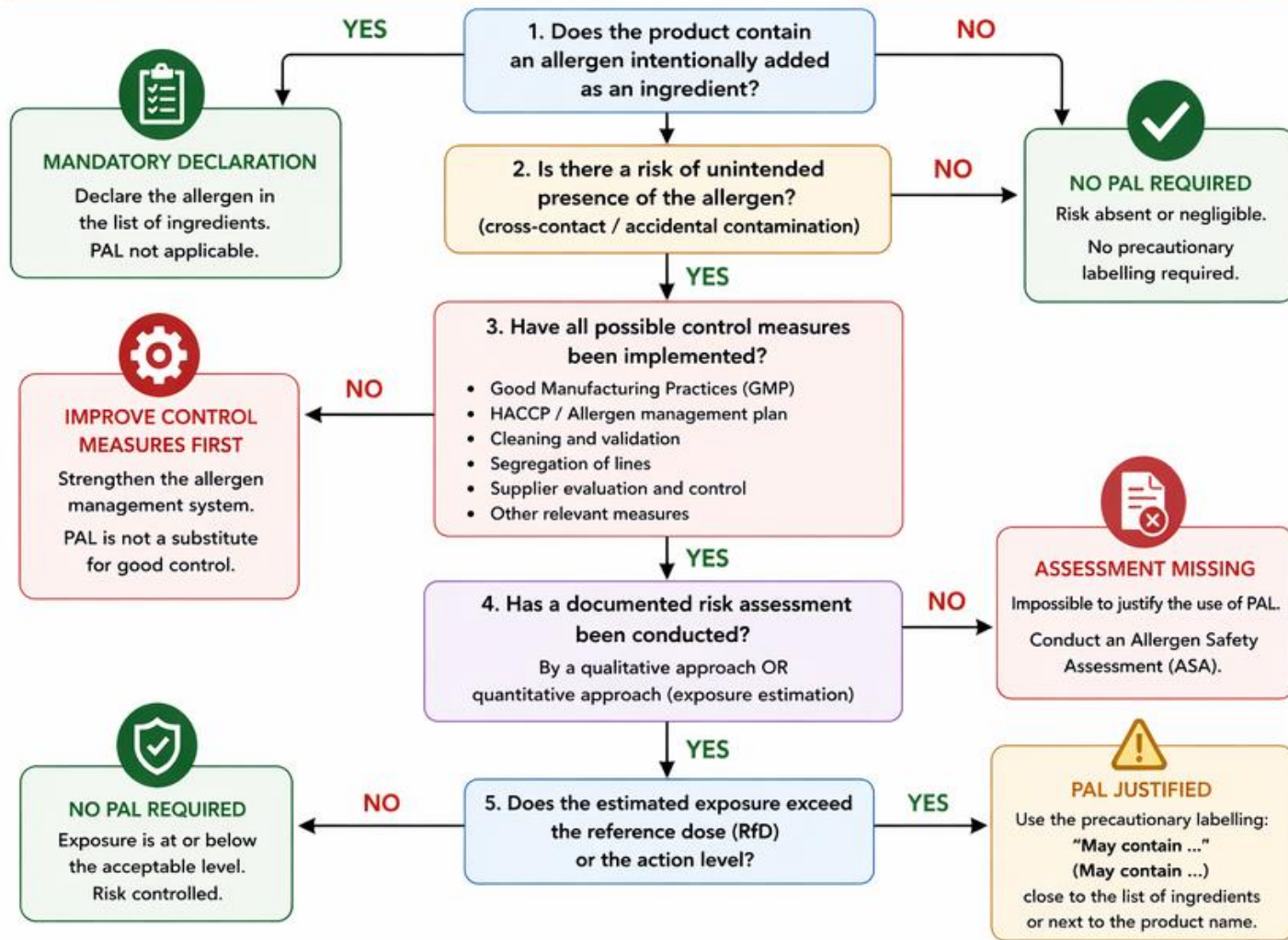
Key points:

- PAL must be based on **risk assessment**
- It cannot substitute for good allergen management practices (CXC 80-2020)
- Overuse of PAL should be avoided
- Action levels are derived from RfDs and expected portion size

Policy significance:

- Establishes a science-based, globally harmonized threshold approach.
- Shifts PAL from voluntary, precautionary disclaimers to a structured risk-management tool.
- Enhances consumer trust by limiting indiscriminate use of “may contain”.

Risk-based approach – Codex (Section 4.3)



KEY PRINCIPLES

- Based on risk assessment
- Protects allergic consumers
- Harmonized and science-based approach
- Avoid over-use and unjustified use of PAL
- Responsibility of food business operators and competent authorities

IMPORTANT REMINDER

PAL must only be used when the residual risk cannot be reduced to a level at or below the action level based on the reference dose (RfD) and the expected portion size.

Analysis

1. Risk-Based Framework for Use of PAL (Section 4.3)

Critical points and divergences on section 4.3

- Major debate: "must" vs. "should"
- Difficulty of practical application
- Uncertainties around the thresholds (Dr)
- Risk of variable interpretation
- Fear of increased liability for operators

Recommendations (Applicability by Operators) :

Support / Not support ?

- Ensure that Section 4.3 is **operational and implementable** by food business operators of all sizes.
- Develop **clear, practical guidance** (step-by-step approach) for applying reference doses in real production settings.
- Provide **simple decision-making tools** (e.g., thresholds, flowcharts, examples).
- Take into account **SMEs constraints** (limited technical and analytical capacity).
- Promote **capacity building and technical support** to facilitate compliance.
- Encourage **gradual implementation** with a transition period where needed.

2. Reference Doses (RfDs) – Section 4.3.1

Table structure: The table classifies priority allergens (almonds, eggs, milk, etc.) with values ranging from **1.0 mg** (nuts, celery) to **200 mg** (crustaceans).

Case of Gluten: A distinction is made for cereals containing gluten. Wheat has two reference values (RdRs) : one for total protein (**5.0 mg**) related to IgE allergies , and one for gluten (**4.0 mg**) related to celiac disease. Barley and rye are assigned only the RdR of **4.0 mg for gluten** .

	Dose de référence (DdR) (mg de protéines totales provenant de l'allergène <u>aliment allergénique</u>)	Dose de référence (DdR) <u>Total de gluten (mg)^{3bis} provenant de céréales contenant du gluten</u>
Arachides	2,0	
Œuf	2,0	
Lait	2,0	
Sésame	2,0	
Noisette	3,0	
Blé ^{3bis}	<u>5,0</u>	<u>4,0</u>
Orge ^{3bis}	-	
Seigle ^{3bis}	-	
Poisson	5,0	
Sarrasin	10	
Lupin	10	
Soja	10	
Crustacés	200	

Relevance of thresholds

Scientific basis: The thresholds are based on FAO/WHO expert recommendations (2022-2025) using the **ED05 exposure level** (dose triggering a reaction in 5% of the sensitive population).

Criticism: ED05 was chosen because it allows for a more feasible risk assessment for companies than ED01, for which the analytical methods sometimes lack sensitivity. However, some members and observers are concerned that these thresholds may not adequately protect infants and young children.

2. Reference Doses (RfDs) – Section 4.3.1

Recommendations:

Support / Not support ?

- **Clarification of conversions:** Although conversion factors have been removed to simplify the text, it is crucial that operators have separate technical guides to convert analytical results to mg of total protein in order to compare them to the Dr.

- **Single RfD of 4 mg gluten for wheat, barley, and rye?**

Justification : More conservative approach for wheat (compared to 5 mg total protein), avoids dual values (protein vs gluten), and reduces confusion while supporting a harmonized, risk-based framework.

3. Section 4.3.2: National Flexibility in Establishing Reference Intakes

- Provides **flexibility to national and regional authorities.**
- Allows them to **establish reference doses** for allergens or hazards **not included in the global Codex list.**
- Requires that such decisions be based on **recognized scientific principles** and **risk assessment.**
- Ensures adaptability to **local consumption patterns and specific public health needs.**

Recommendation:

Support / Not support

- **Harmonisation:** Maintain the use of internationally harmonised DdRs to avoid trade barriers, while allowing national authorities the possibility of establishing DdRs for local allergens not listed

4. Section 4.3.3

Prohibition of combination: If a product uses precautionary labeling for gluten (e.g., "*May contain gluten*"), it **must not** bear the statement "*Gluten-free*".

Recommendations:

Support / not support

Retain wording: "If a PAL statement for cereal(s) containing gluten is used on the label, then the term 'gluten free' shall not be used on the label or in labelling."

Justification : Avoids contradictory labelling; supports risk-based consumer protection.

5. Section 4.4

- Focuses on **training and awareness programs**.
- Encourages competent authorities to **build capacity** among stakeholders.
- Targets **manufacturers, health professionals, and consumers**.
- Aims to ensure **correct understanding and proper application** of allergen labeling standards. Supports **consistent implementation** and reduces misinterpretation of precautionary labeling.

Recommendations:

Support / not support

Requirement that PAL is complemented by education/information programs led by competent authorities.

- Establish **structured and continuous training programs** at the national level.
- Develop **harmonized guidance materials and practical tools** for stakeholders.
- Promote **public awareness campaigns** to improve consumer understanding.
- Encourage **collaboration between authorities, industry, and health experts**.

Justification : Ensures correct understanding and appropriate use of PAL.

6. Presentation of PAL (Section 5)

Standardized Terminology: Use of the phrase "**May contain [allergen]**". Rejection of ambiguous terms such as "Traces of".

Strategic Placement: The statement must be placed immediately after or below the list of ingredients.

Readability: The contrast, font size and style must be identical to those of the ingredients list to ensure optimal visibility.

Absence of ingredients list: If the product is free of them, the mention EPA must appear near the name of the food.

Section 5.2 bis

- Addresses **products exempt from an ingredients list**.
- Requires that **precautionary allergen labeling (PAL)** remains **clearly visible and prominent**.
- Ensures that the absence of an ingredients list **does not reduce consumer protection**.
- Specifies that the precautionary statement should be **placed in a noticeable location on the label**.
- Aims to maintain **clarity, transparency, and consistency** in allergen communication.

Recommendations:

Support / not support

Retain requirement for prominent placement of PAL and same field of vision as allergen statements.

Justification : Improves visibility and consumer awareness.

6. Footnotes 4 bis et 4ter

- Provide **additional clarification** to support the interpretation of allergen reference doses.
- Ensure **scientific consistency** in how values are applied and understood.
- Clarify specific **technical aspects or exceptions** related to certain allergens or thresholds.
- Help avoid **misinterpretation or misuse** of reference values in risk management and labeling decisions.
- Strengthen the overall **credibility and robustness** of the guidance.

Recommendations:

Support / not support

Footnote 4bis

Support inclusion of all cereals containing gluten (wheat, barley, rye) when source is unknown.

Justification : Ensures transparency and consumer protection.

Footnote 4ter

Support use of the term “gluten” in addition to cereal names.

Justification : Enhances consumer understanding.

CONCLUSION AND RECOMMENDATIONS

This draft guideline represents a major step forward in modernizing allergen labelling by moving from a **general precautionary approach** toward a **science-based risk assessment framework**.

This document offers several important advantages:

- it strengthens the protection of allergic consumers through more justified and reliable precautionary allergen labelling;
- it reduces the excessive and unjustified use of “may contain” statements, thereby improving consumer confidence;
- it promotes international harmonization of practices and facilitates trade;
- it clarifies the responsibility of food business operators in allergen risk management.

However, its immediate implementation may create significant challenges for developing countries, particularly for small and medium-sized enterprises (SMEs), due to:

- limited analytical and technical capacities;
- lack of reliable food consumption data;
- difficulties in conducting quantitative risk assessments;
- high costs associated with cleaning validation and control systems;
- and the need for capacity building for both competent authorities and food operators.

CONCLUSION AND RECOMMENDATIONS

Therefore, we can support the adoption of the draft, provided that implementation remains progressive, pragmatic, and adapted to national realities.

It specifically recommends:

- development of simplified technical guidance and operational models;
- maintenance of reasonable flexibility for developing countries;
- stronger support for SMEs;
- and clear clarification of responsibilities between food business operators and competent authorities.
- The principle should be supported, but its practical applicability must be ensured.



ITEM 6

Amendments to the General Standard for the Labelling of
Pre-packaged Foods (CXS 1- 1985): Provisions Relevant to
Joint Presentation and Multipack Formats (step 4)

Current Status of Work

The 47th Session of the Codex Committee on Food Labelling (CCFL47, 2023) considered the project document and agreed to start new work on the labelling of foods sold in joint presentation and multipack formats.

CCFL47 also established an Electronic Working Group (EWG), chaired by Colombia and co-chaired by Jamaica, to prepare a preliminary draft text for consideration at CCFL48.

CCFL48 considered the proposed draft Provisions relevant to joint presentation and multipack formats, returned them to Step 2/3 for further consideration, and re-established an EWG chaired by Colombia and co-chaired by Canada, India and Jamaica, to continue drafting the guidelines, taking into account the discussions and written comments submitted at the session for circulation for comments at Step 3 and consideration by CCFL49.

Analysis

The draft amendments aim to address regulatory ambiguity in applying the GSLPF to complex packaging formats. While the existing standard is broadly applicable, it lacks sufficient specificity, leading to inconsistent interpretation across product types and jurisdictions. Multipack and joint presentation formats introduce specific challenges related to:

- The placement of mandatory information.
- Representation of product composition.
- Communication of quantity and date information.

Overall Regulatory Balance

The amendments strike a balance between flexibility and harmonization by emphasizing practical implementation and general principles. While this supports adaptability, it may also increase reliance on national interpretation and reduce uniformity.

Mandatory Information (Section 8.1.3.1)

This section establishes that mandatory information must be accessible either on the outer packaging or clearly visible on inner units. It reflects a functional approach focused on information accessibility rather than strict placement. While broadly supported, differing views remain regarding requirements when information varies between inner and outer packaging.

Ingredient Labelling (Section 4.2.1)

The provision allows flexibility between separate or combined ingredient lists based on product characteristics. This represents a compromise between differing Member views, enhancing flexibility but potentially reducing consistency in interpretation.

Net Contents (Section 4.3.4)

Divergent views led to a flexible approach allowing declaration of total contents, individual units, or both. While this reduces regulatory burden, it may introduce variability in application and reduce comparability.

Date Marking (Section 4.7.1)

The requirement to declare the earliest applicable date, including safety-related dates where relevant, is widely supported and aligns with consumer protection principles. However, implementation challenges remain in cases involving multiple date types and mixed-product configurations.

Definitions and Interpretation

No formal definitions for “multipack” and “joint presentation” are introduced. While this avoids changes to existing Codex definitions, it may lead to variability in interpretation across jurisdictions.

Section 4.2.1 List of Ingredients

The proposed text provides useful flexibility by allowing either separate or combined ingredient lists depending on product characteristics. However, further guidance is recommended to:

- Specify when separate ingredient lists are required for each unit
- Clarify how claims on individual units should be reflected on outer packaging
- Address situations where inner units are redistributed individually

This will support consistent interpretation and prevent misleading information.

Section 4.3.4 – Net Contents

For improved clarity and consistency, it is recommended that:

- The total net contents of the outer package be declared
- The number and net contents of individual units be indicated where relevant

The use of “and/or” may lead to inconsistent application. Therefore, clearer guidance is needed to define when each declaration is required. This variability may affect consumer understanding and product comparability across markets.

Section 4.7.1 (vi) bis

The requirement to declare the earliest applicable date is strongly supported as it enhances consumer protection. However, further clarification is needed regarding:

- Handling multiple date types (e.g. best-before vs use-by) within the same multipack
- Products originating from different production batches
- Responsibilities when multipack composition changes

Therefore, additional detailed guidance suggested to ensure clarity and proper implementation.

Section 8.1.3.1

While the draft avoids introducing formal definitions for “multipack” and “joint presentation,” this may create regulatory uncertainty, particularly in borderline cases.

Providing additional clarification or explanatory guidance would support consistent and harmonized implementation across countries.

Conclusion

The draft provisions represent an important step toward improving clarity and flexibility in the labelling of multipack and joint presentation foods. However, targeted clarification in key areas remains essential to ensure consistent global implementation, effective consumer protection, and reduced regulatory ambiguity



ITEM 7

What Are These Guidelines?

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



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.



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

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

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 Native Language 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:

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 Native Language — via stickers or digital means — at minimum.

4. Mandate INFOSAN Use

Require mandatory INFOSAN notifications (§4.1.3) so 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

✓ Support the advancement of the guidelines — with targeted amendments

Must-Have Amendments

- Define 'significant disruption' precisely
- Set minimum mandatory info floor (name, date, allergens)

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.

