

YES WE CAN!

Bringing Codex Alimentarius allergen labelling standards into the 21st Century

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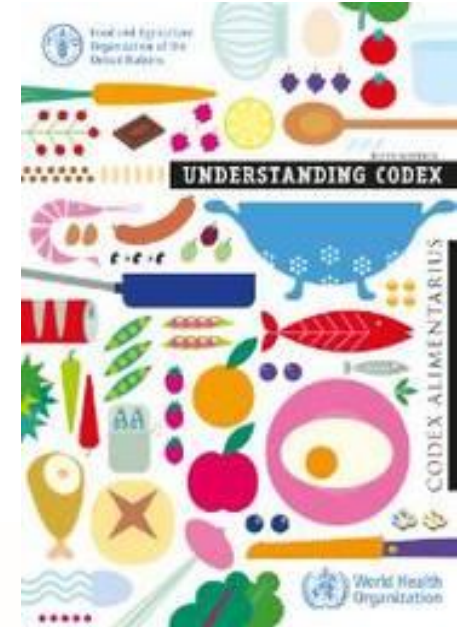
Director, Labelling and Information Standards

FAMS 2023

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Overview

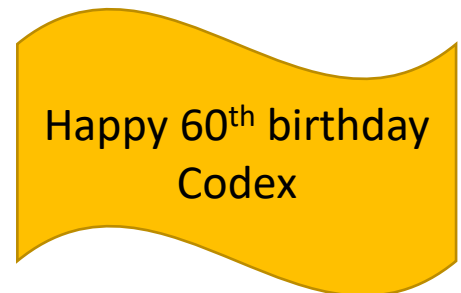
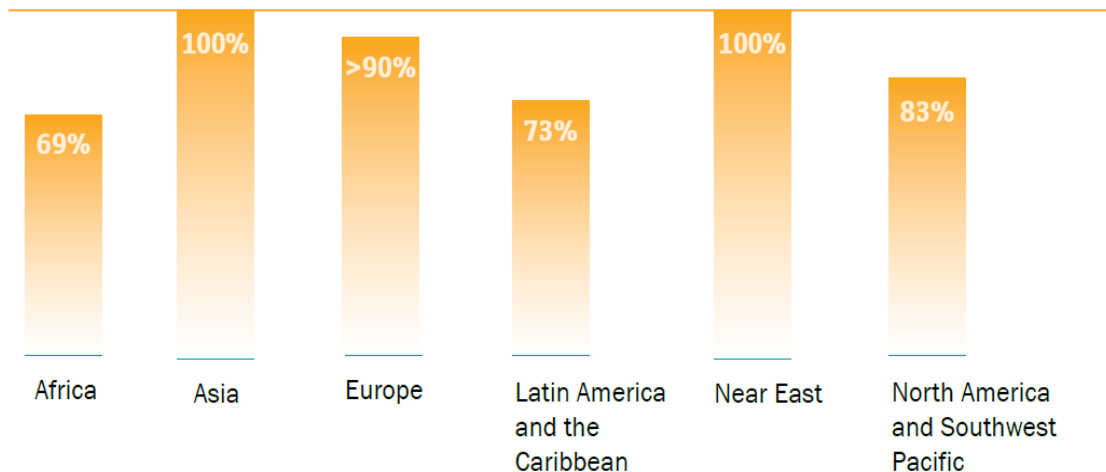
- Codex Alimentarius and its process
- Why is Codex working on allergen labelling?
- Insights from CCFL47
- What's next?



Codex Alimentarius

- International food standards setting body established by the Food and Agriculture Organization (FAO) and the World Health Organization (WHO).
- International food standards, guidelines and codes of practice that are voluntary.
- WTO agreements encourage, where possible, to harmonise domestic regulations with Codex standards.
- Codex texts are aimed at protecting the health of consumers and to ensure fair practices in food trade.

Alignment of national legislation to the General Principles of Food Hygiene by region



Percentage of respondents to a 2016 Codex survey

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Players in this story

- The Committees of Codex Alimentarius
 - **Food hygiene (CCFH)**
 - Food additives (CCFA)
 - Residues of pesticides (CCPR)
 - Residues of veterinary drugs (CCRVDF)
 - Contaminants (CCCF)
 - Nutrition and foods for special dietary uses (CCNFSDU)
 - **Food labelling (CCFL)**
 - **Methods of analysis and sampling (CCMAS)**
 - Import and export inspection and certification (CCFIC)
 - Various commodity committees and regional committees

- **Codex Commission (CAC)**

- **FAO/WHO scientific and technical support**

Codex process

- Codex standards are adopted by consensus among Members
- Based on the best scientific and technical knowledge.
- International organizations with official Observer Status in Codex may also make interventions, submit written comments
- Only Members (i.e. countries) make decisions.



Fun fact:
Standards take an
average of 4.2 years to
develop

Why work on allergen labelling?



In the beginning...circa 1999

General Standard for the labelling of prepackaged food (CXS 1 -1985)

4.2.1.4 The following foods and ingredients are known to cause hypersensitivity and shall always be declared:

- Cereals containing gluten; i.e., wheat, rye, barley, oats, spelt or their hybridized strains and products of these;
- Crustacea and products of these;
- Eggs and egg products;
- Fish and fish products;
- Peanuts, soybeans and products of these;
- Milk and milk products (lactose included);
- Tree nuts and nut products; and
- Sulphite in concentrations of 10 mg/kg or more.



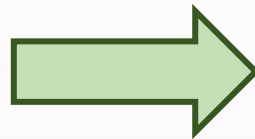
The time was right

Why?

- Provide clear and consistent allergen information for consumers to make safe choices.
- Increase harmonisation and facilitate trade
- Update and reflect current science including consumer evidence



Australia put forward
case to review allergen
labelling



CCFL agreed to
new work in 2019

Meanwhile ...

- Codex Committee on Food Hygiene (CCFH) developed *Code of Practice on Food Allergen Management for Food Business Operators* in 2020.
- Contains guidance on identifying allergens in production and manufacture of food
- Also contains guidelines on allergen risk management practices, but does not cover allergen labelling.
- Opportunity for CCFL to complement the work by CCFH



CCFL allergen labelling work

Led by Australia, the UK and USA

ALLERGEN DECLARATION

- Review the General Standard for the Labelling of Prepackaged Foods (GSLPF) relevant to allergen labelling
- Include the list of allergens to be declared
- New provisions for how declarations are presented

UNINTENDED ALLERGENS

- New guidelines for precautionary allergen labelling (PAL)
- Decision on when to use PAL
- Incorporate reference doses / thresholds
- Presentation

CCFL and CCFH requests for scientific advice


FAO and WHO were asked for advice to:

- (i) validate and update the list of foods and ingredients in section 4.2.1.4 of the *General Standard for the Labelling of Packaged Foods (GSLPF)* based on risk assessment;
- (ii) establish threshold levels in foods for the priority allergens; and
- (iii) evaluate the evidence in support of precautionary labelling

How scientific advice is informing work of CCFL

Expert Advice


Priority allergens



RISK ASSESSMENT OF FOOD ALLERGENS
PART 1: REVIEW AND VALIDATION OF CODEX ALIMENTARIUS PRIORITY ALLERGEN LIST THROUGH RISK ASSESSMENT

Part 1


Threshold levels



RISK ASSESSMENT OF FOOD ALLERGENS
PART 2: REVIEW AND ESTABLISH THRESHOLD LEVELS IN FOODS FOR THE PRIORITY ALLERGENS

Part 2

PAL



RISK ASSESSMENT OF FOOD ALLERGENS
PART 3: REVIEW AND ESTABLISH PRECAUTIONARY LABELLING IN FOODS OF THE PRIORITY ALLERGENS

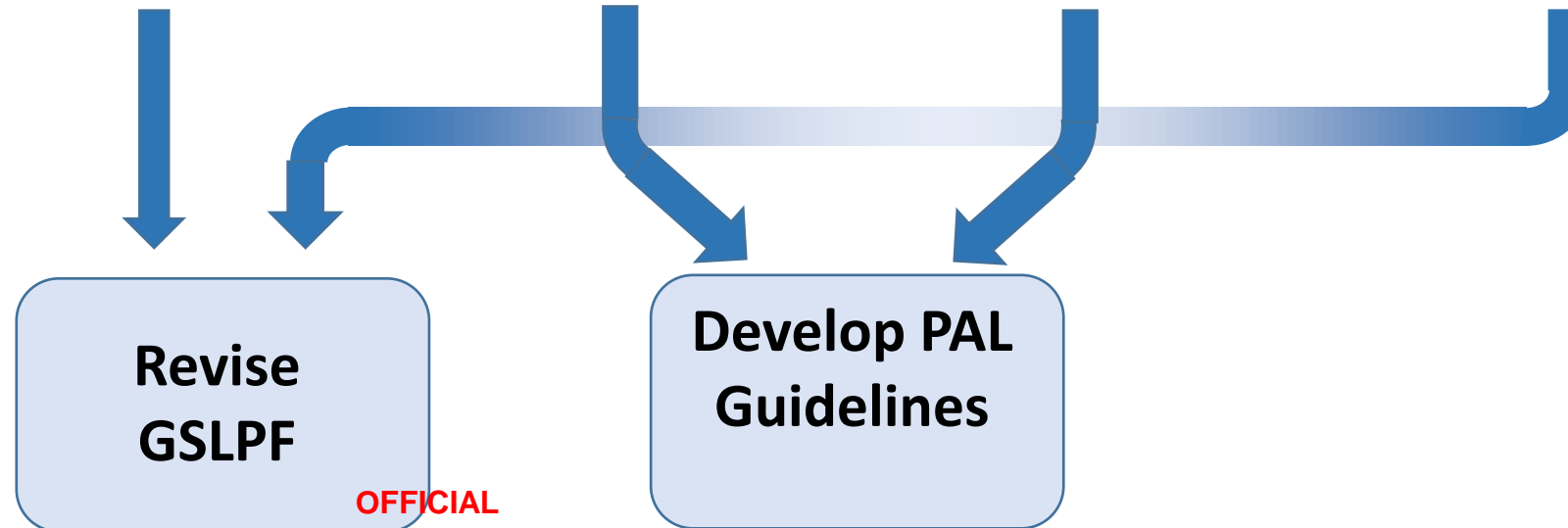
Part 3

Exemptions

Summary and Conclusions

Issued January 2023

Part 4



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Consumer evidence

- A first for Codex
- ISSLG is government organisations involved in the social sciences of food regulation, food safety and public health nutrition from Canada, the United States of America, New Zealand, the United Kingdom, Australia and the European Food Safety Authority
- Prepared literature review on consumer knowledge, attitudes and behaviours relating to allergen declarations and precautionary allergen or advisory labelling (PAL).



<https://www.foodstandards.gov.au/publications/Pages/Consumers-and-Allergen-Labeling.aspx>

Insights from CCFL47

15 - 19 May 2023



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Key discussion areas on GSLPF

- Definitions
 - *Food allergy, coeliac disease and food allergen*
- The list of global priority allergens
 - *Sesame, soy debated*
- Inclusion of allergens for country/regional consideration (new concept)
 - *Need for risk assessment in respective population*
 - *Oats – should be declared or manage through PAL? (x-contamination)*
- Use of specified names (new concept)
 - *Interplay with ingredient names*
- Presentation of declarations (new concept) (*not landed yet*)
 - *Ingredient list or summary statement or both*
 - *Support for flexibility*

The priority allergens and specified names

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 name:

FOODS AND INGREDIENTS	SPECIFIED NAME
Cereals containing gluten:	'wheat'
– wheat and other <i>Triticum</i> species	'rye'
– rye and other <i>Secale</i> species	'barley'
– barley and other <i>Hordeum</i> species	
and products thereof	
Crustacea and products thereof	'crustacea'
Eggs and products thereof	'egg'
Fish and products thereof	'fish'
Peanuts and products thereof	'peanut'
Milk and products thereof	'milk'
Sesame and products thereof	'sesame'
Specific tree nuts	'almond'
– Almond	'cashew'
– Cashew	'hazelnut'
– Hazelnut	'pecan'
– Pecan	'pistachio'
– pistachio	'walnut'
– walnut	
and products thereof	

Allergens for regional consideration

4.2.1.5 In addition to the foods and ingredients listed in section 4.2.1.4, the declaration of any other foods and ingredients, including those listed below may also be required^X using a specified name in addition to or as part of the ingredient name^Y. This shall be based on available risk assessment data for the respective population(s)^Z taking into account risk management considerations.

FOODS AND INGREDIENTS	SPECIFIED NAME
Buckwheat and products thereof	'buckwheat'
Celery and products thereof	'celery'
Oats and other Avena species (and their hybridized strains) and products thereof	'oats'
Lupin and products thereof	'lupin'
Mustard and products thereof	'mustard'
Soybean and products thereof	'soy'
Specific tree nuts	'Brazil nut'
– Brazil nut	'macadamia'
– macadamia	'pine nut'
– pine nut	
and products thereof	

Footnotes matter

- ^XThese foods and ingredients are not included in 4.2.1.4 but have been recommended to be considered for risk management at the regional or national level (see FAO and WHO Risk assessment of food allergens: Part 1: Review and validation of Codex Alimentarius priority allergen list through risk assessment <https://doi.org/10.4060/cb9070en>).
- ^Y In accordance with Section 4.1.1 of the *General Standard for the Labelling of Pre-packaged Foods* (CXS 1- 1985), the ingredient declaration should specify the true nature of the food and be specific and not generic.
- ^ZThe assessment of risk in the respective population(s) to be based on the evidence criteria of prevalence, potency and severity of immune mediated adverse reactions to the food or ingredient as established by FAO and WHO Risk assessment of food allergens: Part 1: Review and validation of Codex Alimentarius priority allergen list through risk assessment. <https://doi.org/10.4060/cb9070en>.

PAL discussion

- Should PAL be mandatory or voluntary?
- Whether ED05 reference doses provide enough protection
- Quantitative versus qualitative risk assessment – some did not want to restrict to just quantitative
- More detail on measuring unintended presence of allergens – methods of analysis.
- More clarity on calculation of action levels – amount of food consumed

What's next

Electronic working group to:

1.

- Further advance GSLPF amendments (at Step 5 – to CAC)
- Progress draft PAL guidelines (at Step 2 - further drafting)

2.

Update CCFH on outcomes to ensure GSLPF revision and PAL guidelines consistent with CoP

3.

Request CCMAS to recommend suitable analytical methods and guidance on their validation and applications including sampling plans for determining allergenic protein in foods, including for PAL and exemptions

More information

- CCFL47 web page
 - Draft report available
 - Appendix II – draft revisions to the GSLPF
 - Agenda paper
 - CRD 2 – Report from the virtual physical working group
- [meeting-detail | CODEXALIMENTARIUS FAO-WHO](#)



Thank you!



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