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IMPACTS OF CODEX GUIDANCE ON GLUTEN AND FOOD ALLERGEN MANAGEMENT

Regional and Global Developments

Food Allergen Management Symposium 2025

22 May 2025 • Sydney, Australia

How We Got Here ?

Current Impacts – Regional Transformation

Prospective Developments



- ❑ No cure possible to date to these conditions
- ❑ Avoidance of the Food where the Allergenic / Gluten Source Ingredient is Present, remains the main risk management strategy
- ❑ Preventive Controls and Accurate Information About Food Allergen Composition Are the Cornerstone of Food Allergen Risk Management Interventions



Codex Standards on Food Allergens

CCNFSDU: Codex Committee on Nutrition and Food for Special Dietary Uses

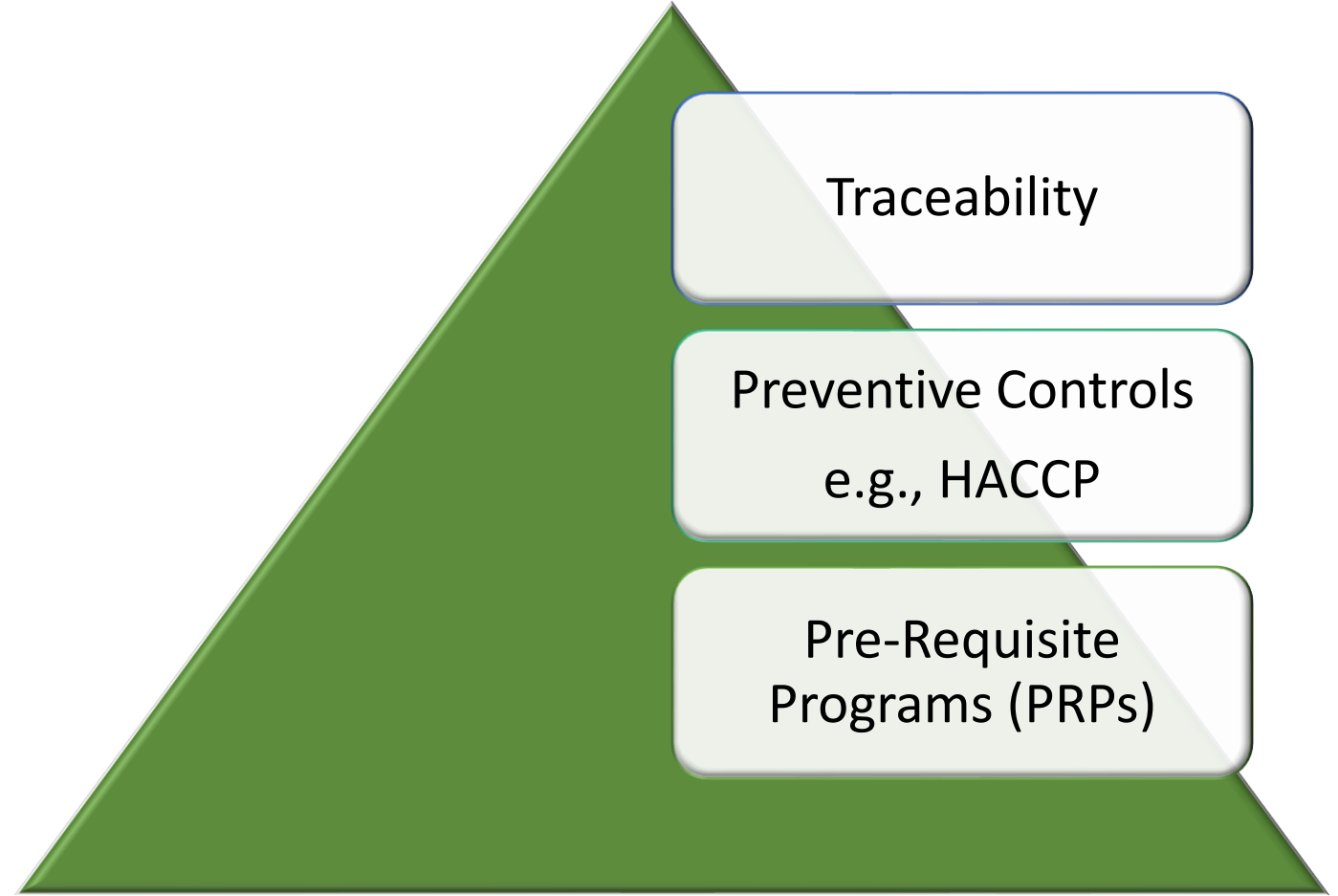
CCFL: Codex Committee on Food Labelling

CCFH: Codex Committee on Food Hygiene



Integrated Food Safety Management Systems

Preventive Approach



Integrated Management of Gluten and Allergen Sources ⁶

Along the food production chain



Blast from the Past Recalling Presentations in 2016⁷

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Food Risk Analysis &
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Food Allergen Management – A Global Perspective

AOAC International Annual Meeting

Prof. Samuel Godefroy, Ph.D.

Full Professor, Food Risk Analysis and Regulatory Policies

Dallas, Texas, USA

20 September 2016

A Call For Action



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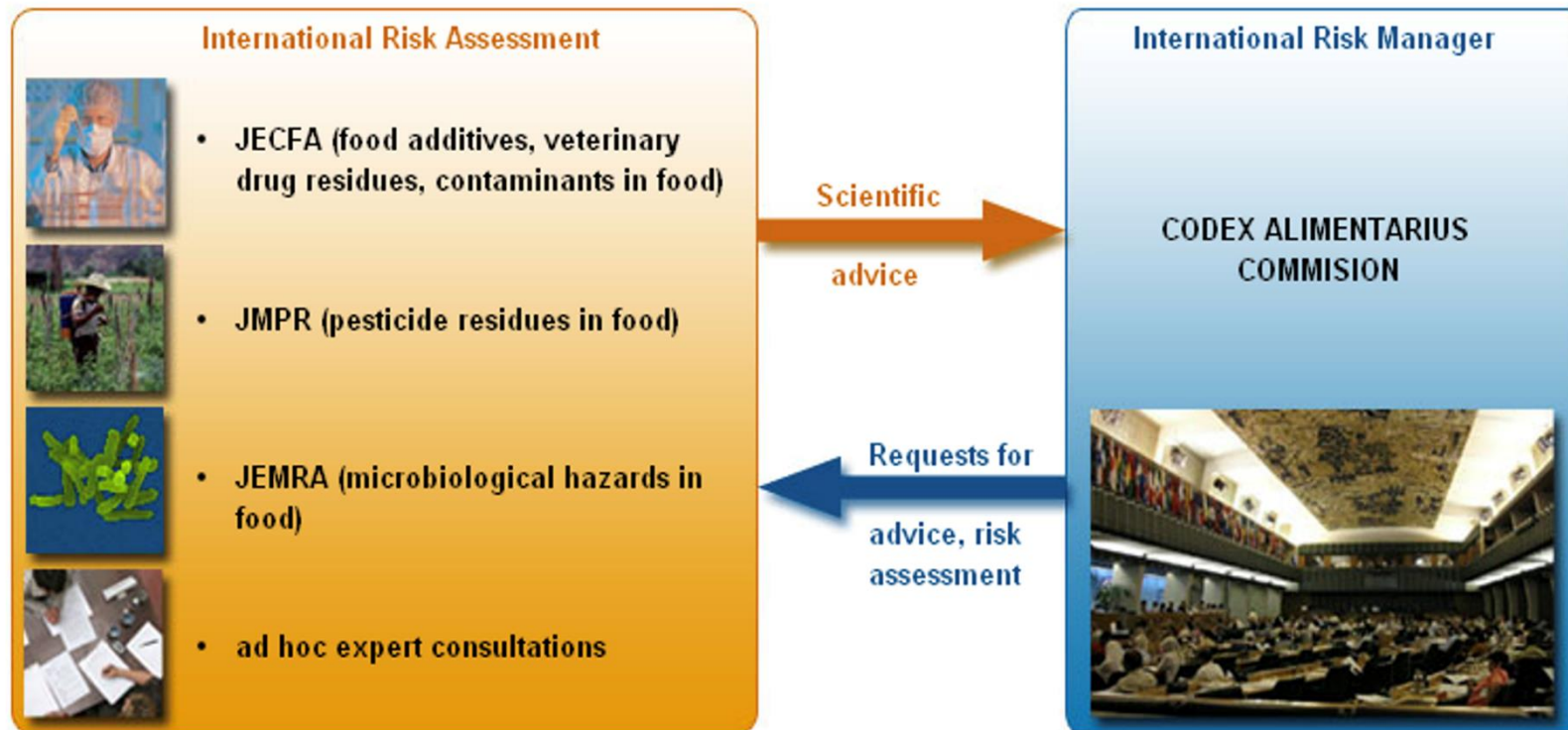


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Neutral, Robust & Global Scientific Advice Needed

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Calling for Action!

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Develop Guidance For Industry And Consumers

- ❑ Guidance To **Industry** To Enhance Allergen Management
- ❑ Guidance To **Industry** To Develop Risk-based Approaches For Adoption Of Precautionary Statements
- ❑ Guidance To **Consumers** To Recognize / Identify Products That Can Be Trusted As Far As Allergen Control Is Concerned

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Towards Codex Priorities : Food Allergen Management

- ❑ Identifying Food Allergen Management On Codex Priorities Is Needed:

- To Support Enhanced Protection Of Allergic Consumers Internationally
- To Support A More Predictable Environment For Industry



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New Codex Guidance Developed (2020)



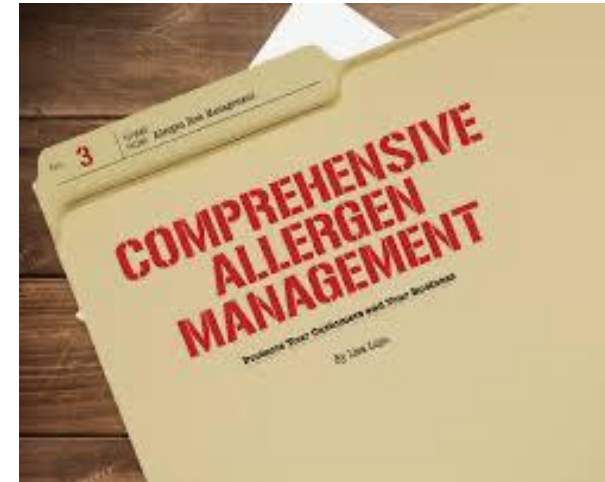
REP20/FH – Appendix II

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Appendix II

**DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT
FOR FOOD BUSINESS OPERATORS**

- ❑ FBOs should develop **policies and procedures** to **identify allergens** and implement practices and **controls** addressing
 - Cross-contact
 - Undeclared allergens
 - Labelling
 - Information for consumers
- ❑ Control measures should be part of GHP/HACCP and based on **risk assessment**
- ❑ Effective, proactive allergen management = reduced risk for consumers



Source : qualityassurancemag.com

Reports Stemming from Scientific Advice

- ❑ The scientific advice requested was completed by an ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens, which was convened 4 times and issued full reports currently available:
 - [Part 1: Review and validation of Codex priority allergen list through risk assessment](#)
 - [Part 2: Review and establish threshold levels in foods for the priority allergens](#)
 - [Part 3: Review and establish precautionary labelling in foods of the priority allergens – Summary and conclusions](#)
 - [Part 4: Review and establish exemptions for the food allergens – Summary and conclusions](#)

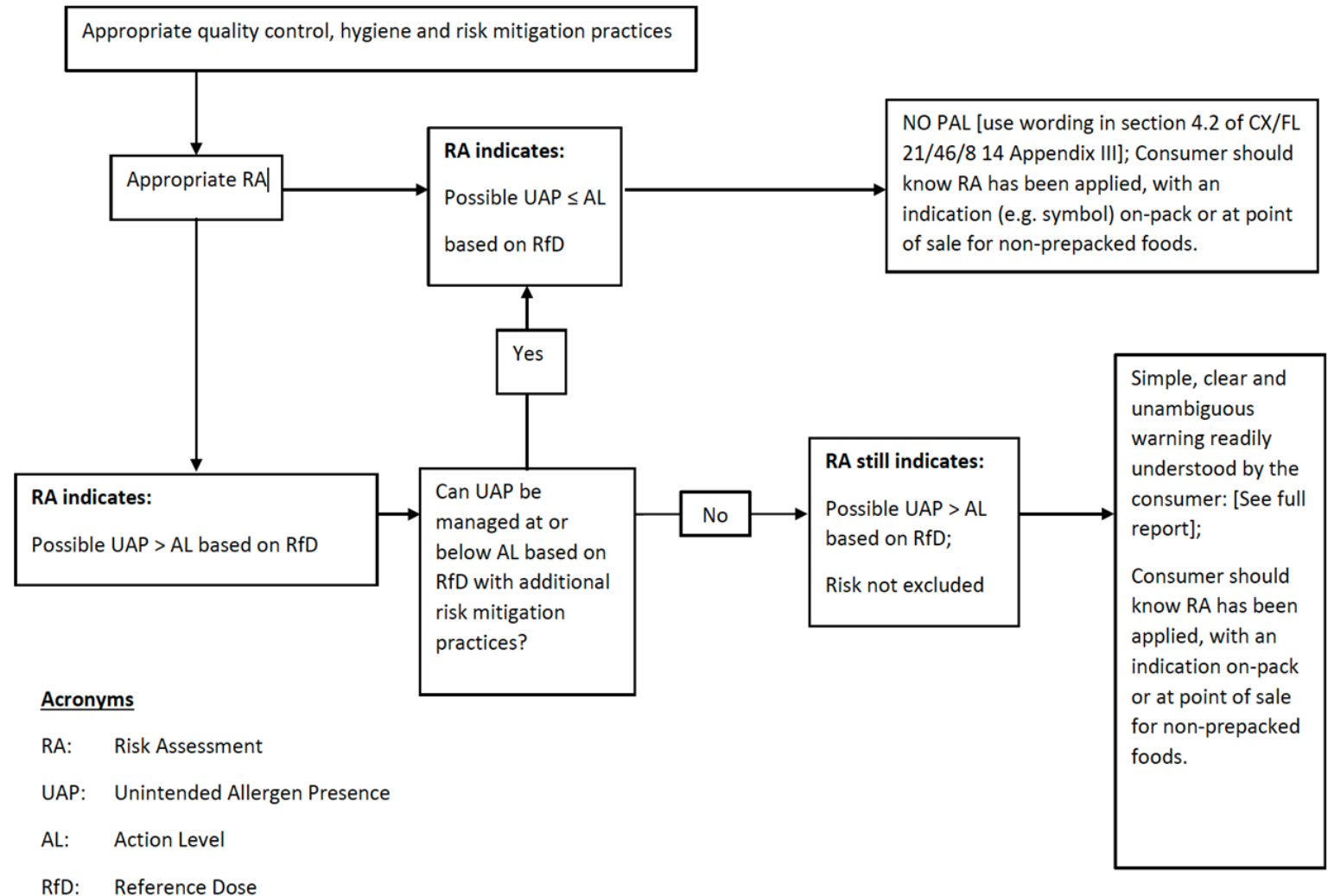


Precautionary Labelling of Priority Allergens

PAL = effective strategy to protect consumers from UAP when based on:

- Comprehensive allergen risk management program
- Single clear statement
- Effective risk communication

PAL decisions should be part of a regulatory framework (PAL when possible UAP > Action Level based on RfD)



Where We are

CCFL48 was held from 27 October – 01 November in Quebec City,

☐ Chair: Canada

☐ Participants: 44 member countries,
1 member organisation, 26 observer
organisations, including:



Major Achievements andConcerns...

Guidelines on PAL...



1. Lack of analytical methods in relation to allergens and RfDs
2. Burden to small FBOs to conduct risk assessments and lack of guidance on qualitative risk assessment
3. RfD/concentration for cereals containing gluten/gluten
4. Level of protection for the most vulnerable consumers with the proposed thresholds (ED05/ED01) and whether available data is sufficient
5. Limiting PAL when RfDs are exceeded, noting views that PAL could be used even if RfDs are not exceeded

Analytical Methods



- ❑ Reminder of Outputs of Expert Consultations:
 - RfD can be implemented and monitored with current analytical capabilities, to reach LOQ
 - Report 2 explains relationship between analytical methods and action levels
- ❑ CCMAS continued work on recommended methods that meet recent AOAC validation guidelines and CEN 17.855 method performance requirements
- ❑ Sampling guidance in General guidelines on sampling (CXG 52-2004) - revised and adopted in 2023

Burden to Small FBOs...

Lack of Guidance on Qualitative Risk Assessment

- ❑ FAO/WHO to provide guidance and conduct capacity building activities
- ❑ IUFoST (through GFORSS) offered to provide support to this effort through its network



Food and Agriculture Organization
of the United Nations



World Health
Organization



IUFoST
*GFORSS is a disciplinary
organization of IUFoST*

- ❑ FAO/WHO to provide advice
- ❑ To be added to table with RfDs
- ❑ Difference between wheat and gluten.
 - In coeliac disease, the symptoms are caused by accumulating doses of gluten and not necessarily the amount ingested during one meal



Level of Protection

❑ Reminder of Expert Consultation:

- Characteristics of objective reactions were no different at ED01 and ED05
- The expected very low rate of allergic reaction would not be expected to differ between ED01 and ED05, and ED05 was conservative enough
- ED01 would introduce limitations for monitoring unintentional allergens and for the application of PAL

❑ There is no zero risk



Propagation Around the World

❑ Allergen Labelling Regulations on Every Continent:

- China's Recent Regulation for Mandatory Declaration
- Other Countries' Regulations ... Requiring Implementation

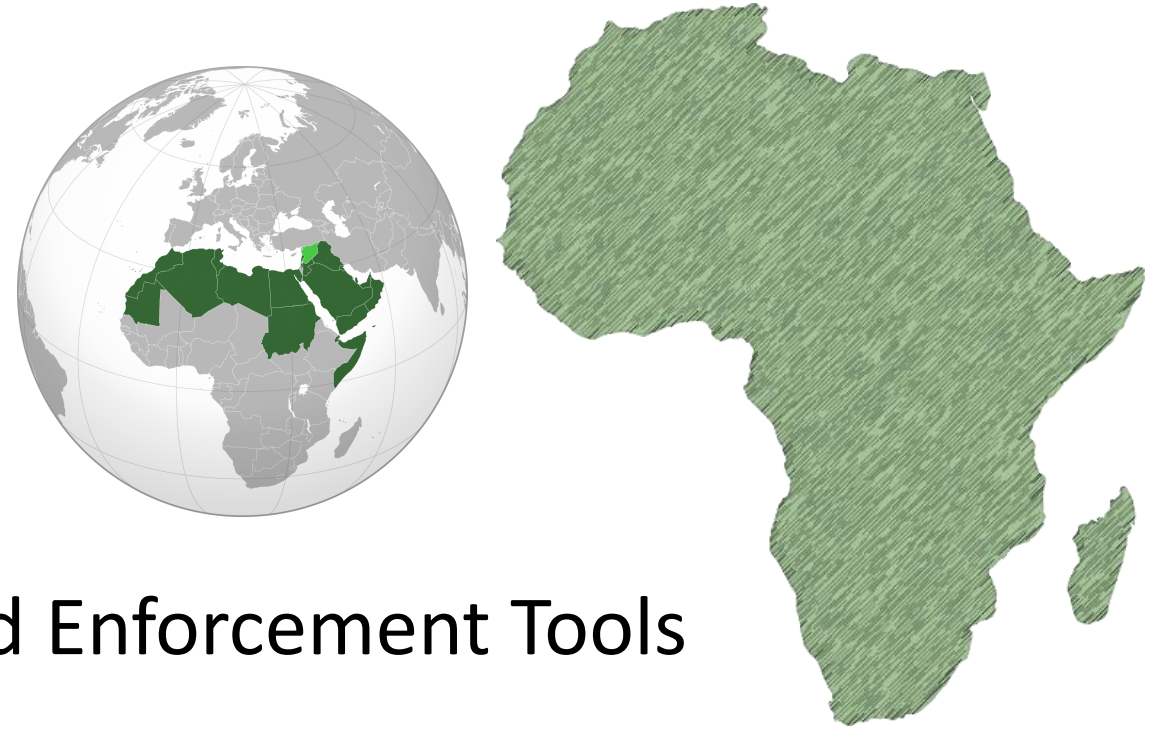


❑ Updates to Gluten Free Food Management: Progress And Gaps



Rules ExistBut

- ❑ Limited Awareness of the Issue
- ❑ Limited Impact Assessment
- ❑ Limited Compliance Verification and Enforcement Tools
- ❑ Opportunities of Development of Allergen Free / Gluten Free Foods Using Indigenous Crops...





The Arab Section of AOAC INTERNATIONAL



Arab Food Allergen and Gluten Initiative



القسم العربي لمنظمة AOAC الدولية

www.arabaoac.org

www.arabaoac.org

The Creation of an Arab Food & Agriculture Analytical Community²³



Momentum for

Awareness Raising of Food Allergen and Gluten Methods

- ❑ Review methods currently being used for Gluten Free Testing
- ❑ Develop Guidance For Method Performance and Acceptance
- ❑ Capacity Building and Competency Enhancement on the Retained Methods



Some Initiatives Underway....

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- ❑ Standardize Analytical Methods for Gluten Free Testing:
 - AOAC International Driven Approach (guided by Codex)
 - Arab Official Gluten Free Methods
- ❑ Data Supporting Food Consumption Information of Celiac Individuals and their Facilities
- ❑ Surveys of Gluten Occurrence in Gluten Free Foods
 - Either labelled or considered / assumed as such



Pre-Requisite for Success: Collaborative Approach

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