

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5

FL/47 CRD29

Original Language Only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-seventh Session

Gatineau, Canada

15 – 19 May 2023

Comments from Jamaica

#### Agenda Item 5

In general, we would like to request that both allergen and precautionary allergen be reviewed together to ensure alignment of both documents.

#### Food Allergen Labelling

Section 4.2.1.5 – We would like to request for this section to be removed because it may confuse consumers as well as lead to unfair practices in food trade. In case this section is maintained, further clarity would be required for lupin and mustard.

Section 4.2.1.6 – We would like to request clarification whether the 10 mg/kg is as sold or as consumed.

Section 8.3.2 / 8.3.2.1 – We do not support addition of **allergens** in a separate statement because it could compromise the legibility of the labels, especially for small packs. It could also lead to errors and consequently the food safety may not be fully ensured for the allergic consumers.

#### Precautionary Allergen Labelling

Purpose, Scope and Definitions: Precautionary allergen labelling should be amended by adding the word “significant” to “a risk” understanding that food business operators must assess the allergen risk for informing effectively consumers on the potential presence of unintended food allergen cross-contacts.

4.3 Section 4.3 suggests that only a quantitative risk assessment justifies the use of precautionary allergen labelling (PAL). However, the presence of allergen residues in particulate form - which in essence cannot be quantified – may also justify PAL. We would therefore recommend the section to be reworded as such: *“Where all allergenic hazards can be quantified, PAL should only be used if the presence of a protein from an allergen is equal to or above the action level for this allergen, using the listed reference dose values in 4.3.1.”*

Section 5.2: We would like to suggest “PAL should appear immediately after the end of the ingredient list (when present) and contrast distinctly from surrounding text such as through the

use of font type, style and/or colour. The same font format used for the allergens in the ingredient list shall be used for PAL.”

**General**

We agree with the proposed location of the draft guidelines for the use of PAL as an annex to the GSLPF.

We also agree on the need to seek advice from Codex Committee on Methods of Analysis and Sampling (CCMAS) on standardized method of analysis and sampling.

Since the General Standard for the Labelling of Prepackaged Foods will newly include appendixes related to PAL, the Code of Practice on Allergen Management for Food Business Operators should be amended accordingly and include guidance for the harmonized management of allergen cross-contacts to protect the health of the consumers and ensure fair practices in food trade.