

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 8.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

Ottawa, Canada

11-15 May 2026

COMMENTS FROM AUSTRALIA

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 (PAL) (Step 7)

Precautionary allergen labelling

Australia thanks the United States of America for chairing the Physical Working Group (PWG) on Precautionary Allergen Labelling (PAL), the United Kingdom as our fellow co-chair, and members for their constructive and productive discussions at the PWG.

Australia proposes an amendment to footnote 6 to allow competent authorities the option to specify the declaration of 'gluten' instead of 'rye' and/or 'barley' in PAL statements. Australia proposes that footnote 6 be referenced at the end of both sections 5.2.2 (as current) and 5.2.3 (in place of current footnote 7), as it is relevant to both provisions.

The proposed amendment is as follows:

⁶ In addition to the specified names of wheat, rye and barley, the word 'gluten' may be used. **Where permitted, the word 'gluten' may be used in place of the specified names rye and barley.**

This amendment recognises that:

- a) wheat is a priority food of concern for both IgE-mediated food allergy and coeliac disease;
- b) gluten is the substance of concern in rye and barley, as relevant to coeliac disease;
- c) the word 'gluten' is used in Codex texts as a signal to consumers intolerant to gluten (such as in CXS 118-1979), without reference to specific cereals containing gluten; and
- d) consumer understanding and education around the gluten content of specific cereals and their avoidance varies regionally and, as such, declaring specific cereals in a PAL statement may, for some populations, unnecessarily lead to consumer confusion rather than improve risk communication.

Australia considers it appropriate for the PAL guidelines to provide competent authorities with the option to use wording already present in other Codex standards to clearly and effectively communicate risk assessment outcomes regarding gluten in a manner appropriate to their populations.

Agenda item 8.1: The application of food labelling provisions to alcoholic beverages

Australia acknowledges the work undertaken by Tanzania, with the assistance of Barbados, Botswana, Eswatini, Jamaica, Madagascar, Saint Lucia, Seychelles, Uganda and the World Health Organization, in the preparation of the discussion paper proposing new work on the application of food labelling provisions to alcoholic beverages.

Australia recognises the public health significance of alcohol consumption and remains committed to preventing and minimising alcohol-related harms among individuals, families, and communities. Australia supports constructive consideration of how Codex texts can appropriately support consumers to make informed decisions about alcohol.

Australia recalls that this Committee has considered work on the application of labelling provisions to alcoholic beverages over several meetings, and notes that, to date, consensus has not been reached to proceed with new work in this area. Australia further notes that the views of Members and observers, as reflected in the CCFL49 CRDs, are varied, including differing perspectives on whether new work should be undertaken and on the suitability of the proposed scope.

In light of the diversity of views already expressed, Australia considers it unlikely that CCFL49 will reach consensus to proceed with new work on the labelling of alcoholic beverages on the basis of the project documentation currently before the Committee.

It is Australia's view that the scope of the current project document is broad and encompasses matters that are already addressed through existing Codex texts, as well as issues where there is currently limited alignment among Members. The proposed scope also does not sufficiently distinguish between foundational labelling elements that support basic public health and safety outcomes and more complex policy areas, which may make consensus to proceed to new work difficult to achieve. On this basis, Australia is not in a position to support proceeding with new work under the current proposal.

Australia would encourage any future discussion papers, and accompanying project documentation as appropriate, to consider a more focused scope that identifies areas where there is both a gap in existing Codex texts and a lack of consistent application of basic labelling provisions for alcoholic beverages (for example, an indication of alcohol content), with a view to building consensus within the Committee.