

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2.2

FL49/CRD10

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

Ottawa, Canada

11 - 15 May 2026

MATTERS REFERRED BY CCMAS45

Comments by Association of European Coeliac Societies (AOECS)

AOECS

AOECS, the Association of European Coeliac Societies, thanks CCMAS for the important work regarding suitable analytical methods for precautionary allergen labelling (PAL) and in particular for the important work to list methods for determination of gluten in Table 1 and 2 in the document CX/FL 26/49/2 Add.2.

However, we are concerned that “... *the list of methods shall not be construed as a recommendation or an endorsement...*” (Appendix, page 3).

The Codex Procedural Manual informs:

“2.10 Principles for the establishment of Codex methods of analysis, Purpose of Codex methods of analysis

163. The methods are primarily intended as international methods for the verification of provisions in Codex standards. They should be used for reference, in calibration of methods in use or introduced for routine examination and control purposes.

Methods of analysis: Definition of types of methods of analysis“.

In para 164 -167) definitions from Typ 1 to Type 4 are given.

We would like to recall that CAC adopted the R5-Method as a Typ 1 method already in 2008.

Regarding the information on page 3: “... *multiple allergen testing kits with manufacturers’ in house validation are available from a range of suppliers and may also be appropriate, but this should be verified (see AOAC and EN guidelines reference above the guidance).*” we are questioning the sensitivity and security of gluten determination in multiple allergen testing kits.

The prevalence of coeliac disease is estimated to be 1-2% around the globe in countries where gluten containing cereals and their products are part of the national nutrition. Therefore, several billions of consumers trust on Codex to establish guidance that analytical tests will detect gluten as precise as possible:

Underestimation possess a health issue and overestimation has the consequence that PAL is unnecessary used and the variety of foods will be restricted to an unacceptable reduction of safe foods.

We understand the difficulties of gluten determination however, we kindly ask Codex to spend further work on this issue. As a first start we propose that experts should investigate the difference between the AOAC and EN guidelines and work on a harmonized Codex guideline.