

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5

CX/FL 26/49/5 Add.1

April 2026

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-ninth Session

11-15 May 2026

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)

Comments in reply to CL 2026/07-FL

Submitted by Australia, Brazil, Canada, Colombia, Costa Rica, Ecuador, Egypt, European Union, Indonesia, Morocco, New Zealand, Norway, Paraguay, the Republic of Korea, South Africa, Sudan, Thailand, United Kingdom, The United States of America (USA), Zambia, and Association Of European Coeliac Societies (AOECS), European Federation of Allergy and Airways Diseases Patients' Associations, Food Industry Asia, FoodDrinkEurope, ICBA, ICGA, ICGMA, IFT, International Confectionery Association (ICA), International Special Dietary Food Industries (ISDI), MoniQA, The European Federation of the Associations of Dietitians (EFAD)

Background

This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2026/09-FL¹ issued in March 2026. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCFL>

ANNEX

GENERAL COMMENTS

COMMENTS	MEMBER / OBSERVER
AOECS thanks the chairs of the EWG and supports the advancement of the draft to step 8	AOECS
<p>Australia would like to thank the EWG Chair United States of America, and our Co-chair the United Kingdom for the progress made on the draft precautionary allergen (PAL) guidelines. Subject to CCFL49 consideration and resolution of outstanding matters, Australia supports advancing the draft guidelines to Step 8.</p> <p>Australia acknowledges contributions of the FAO/WHO Expert consultations on qualitative risk assessment and cereals containing gluten or gluten which have been completed since CCFL48. Australia values the publication of summary reports of this work, and looks forward to the publication of the full reports to support CCFL in making informed risk management decisions.</p> <p>Australia has the following specific comments on the draft guidelines.</p>	Australia
<p>Brazil thanks the United States of America, Australia and the United Kingdom, as Chair and Co-Chairs of the electronic working group, for the substantial work undertaken to progress the draft Guidelines on the Use of Precautionary Allergen Labelling. Brazil also thanks FAO and WHO for supporting this work through scientific advice and capacity-building activities relevant to precautionary allergen labelling and food allergen risk assessment.</p> <p>Brazil recognizes the progress made in the draft and the efforts to identify areas of compromise. Brazil also acknowledges the relevance of the FAO/WHO scientific work and the technical contribution from CCMAS. At the same time, Brazil remains concerned that important technical, regulatory and implementation issues are still not sufficiently resolved, particularly in Sections 4.3, 4.3.1 and 4.3.3, and footnotes 3, 4bis and 4ter.</p> <p>In Brazil's view, the current draft still relies too heavily on a prescriptive linkage between PAL, action levels and reference doses. This approach may reduce the flexibility needed for risk management in situations of uncertainty, matrix-specific limitations, limited analytical capability, and differing national implementation capacities. It may also weaken the protective function and credibility of PAL as a risk communication tool.</p> <p>Brazil also notes that the information provided by CCMAS, while useful, does not fully resolve the implementation concerns associated with the current draft. CCMAS clarified that the listed methods were compiled only to support CCFL deliberations and should neither be construed as endorsed methods nor be cited in CCFL texts.</p> <p>CCMAS also emphasized that the compiled methods are not exhaustive, are not suitable across all allergens, matrices and action levels, and must be demonstrated to be fit for purpose in each case. In addition, CCMAS indicated that only a limited number of collaboratively studied and standardized methods are currently available, that many of the submitted methods are proprietary and not globally distributed, and that limited access to such methods in some regions could be restrictive to trade. Brazil further notes that no methods were submitted for some priority allergens, such as pecan and pistachio.</p> <p>These elements suggest that the current analytical landscape does not support an overly restrictive use of PAL based primarily on action levels and reference doses. While analytical methods can be useful to inform risk assessment in specific cases, their limited availability, accessibility and matrix-specific applicability should be considered when developing provisions that closely link PAL decisions to quantitative thresholds.</p> <p>Brazil further notes that two recent FAO/WHO scientific outputs that are directly relevant to the unresolved provisions of the draft have not yet been published in full, namely the Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens – guidance for risk assessment (June 2025) and reference dose(s) for cereals containing gluten or gluten (November 2025).</p> <p>In the current process, Members have had access only to summary reports. These two consultations are directly related to the unresolved issues. In Brazil's view, full access to the methodologies, assumptions, uncertainties and limitations of these two consultations remains important for informed final consideration by Members.</p>	Brazil

COMMENTS	MEMBER / OBSERVER
For these reasons, Brazil considers that the draft is not ready for advancement to Step 8.	
Canada believes that the text is close to being ready for advancement to Step 8 pending adjustments as a result of circular letter responses and the discussions at CCFL 49.	Canada
<p>La modificación propuesta a la tabla 4.3.1, así como la inclusión de la nota 3bis, se consideran apropiados dado que ofrecen mayor claridad, especialmente en el caso del trigo.</p> <p>La inclusión de la sección 5.2bis y el ajuste propuesto a la sección 5.2.1 se consideran apropiados. Respecto de las notas sugeridas a la sección 5.2.1, se propone que el texto contenido en estas sean subnumerales dado que señalan una situación particular relevante que debería ser destacada en el documento.</p> <p>Se considera que el texto propuesto es apropiado para el avance al paso 8.</p>	Colombia
<p>Costa Rica está de acuerdo con la configuración actualizada del cuadro 4.3.1 y su nota al pie;</p> <p>Costa Rica apoya la redacción propuesta para la Sección 5.</p> <p>Costa Rica apoya el avance del texto al trámite 8.</p>	Costa Rica
<p>El país está de acuerdo con las consideraciones técnicas de la sección 4.3.1 y su tabla correspondiente a las dosis de referencia sobre mg de proteína total del alérgeno alimentario y la dosis de referencia sobre el total de mg de gluten, procedente de cereales que contienen gluten.</p> <p>Ecuador está de acuerdo con el texto actualizado de la Sección 5 y con la propuesta de la Sección 5.2 bis; así como, del ejemplo propuesto para ilustrar las palabras equivalentes descritas en la Sección 5.2.1 y las notas al pie que aclaran el abordaje de la declaración del gluten.</p> <p>Ecuador está de acuerdo con avanzar al trámite 8.</p>	Ecuador
<p>Egypt supports the updated configuration of the table in section 4.3.1 as it reflects the recommendations from the FAO/WHO expert consultations.</p> <p>However Egypt has concerns that reference doses, particularly when the use of ED05 values rather than ED01 and applied through action levels. Their use raises important challenges related to variability in consumption patterns across countries, differences in population sensitivity and in analytical capability.</p> <p>Particularly the use of ED05 values are not yet sufficiently validated for global regulatory application especially in situations of uncertainty or limited data. This may result in unnecessary regulatory and trade impacts when used.</p> <p>Egypt maintains that they should not be treated as rigid thresholds that override qualitative risk assessments or risk management judgments. A more flexible and precautionary approach necessary to ensure adequate consumer protection.</p>	Egypt
Yes, Egypt supports this text is ready for advancement to Step 8.	Egypt
The EUMS would like to submit the following general and specific comments on the relevant sections of the draft guidelines, with a view to further refining the text and ensuring consistency. Should agreement be reached on the outstanding points at CCFL49, the EUMS consider the text sufficiently developed to advance to Step 8.	European Union

COMMENTS	MEMBER / OBSERVER
<p>FoodDrinkEurope considers that further clarification is still needed before the text is ready for advancement to Step 8.</p> <p>In particular, additional clarity is required regarding the application and interpretation of the cereal-specific and gluten-based reference doses in Table 4.3.1, the role and wording of the associated footnotes, and the consistency of PAL wording.</p> <p>Advancement should therefore be considered once these elements have been sufficiently clarified to ensure that the guidance is both scientifically robust and practically implementable.</p> <p>FoodDrinkEurope reiterates the importance of maintaining a flexible, science-based PAL framework grounded in appropriate risk assessment, using quantitative and/or qualitative information as relevant.</p> <p>This flexibility is essential to support proportionate risk management decisions and to avoid the systematic or defensive overuse of PAL, which may reduce its credibility and effectiveness for consumers.</p> <p>In addition, due consideration should be given to analytical and operational feasibility, including current detection capabilities, when developing and implementing reference doses, action levels and PAL wording.</p> <p>Finally, FoodDrinkEurope emphasises the importance of clear and consistent risk communication to consumers, ensuring that labelling information remains understandable, meaningful and not misleading.</p>	FoodDrink Europe
<p>The International Chewing Gum Association (ICGA) would like to thank - and commend - the leadership of the USA and the support from Australia and the UK to further refine these draft Guidelines on the Use of Precautionary Allergen Labelling (PAL). We also noted the very intense participation of many countries and observer organisations to the two rounds of comments held during the EWG, which showed how important this PAL guidance is for countries and food business operators and allergenic patient representative organisations.</p> <p>ICGA supports the consideration of the report of the EWG during the pre-session PWG to be held immediately before CCFL49 plenary session.</p> <p>ICGA has no immediate proposed amendments to formulate at this point in time on the text of the draft guidelines, but we are looking forward to see the PWG being the occasion to provide further clarifications on several aspects related to:</p> <ul style="list-style-type: none"> - How the gluten reference dose is to be applied to the named cereals? - How gluten from barley and rye should be counted in relation to properly informing consumers with wheat allergy? - How avoiding complex - or even impracticable scenarios - with regards to needs to perform regular analytical crosschecks? <p>Note:</p> <p>We further note that the FAO/WHO Expert Consultation recommended a standard reference dose of 4 mg for all gluten-containing grains including for wheat. This would offer a general protection for all individuals with coeliac disease AND those with wheat allergy.</p> <p>The reference dose of 5mg for wheat might not be needed when there is a lower reference dose established for gluten AND gluten-free claims are not permitted on products where the PAL would be applied.</p> <p>We respectfully request that the table containing the RfDs for gluten be further reviewed by the PWG and be revised in advance or at the CCFL49 session, as appropriate.</p>	ICGA
<p>Comments: In general, ICGMA is aligned with the updates proposed in the PAL guidelines related to Section 4.3, 4.4 as well as 5.</p>	ICGMA

COMMENTS	MEMBER / OBSERVER
<p>In Table 4.3.1 presents a reference dose (RfD) of 5.0 mg for total protein in wheat and 4.0 mg for total gluten from cereals containing gluten-specifically, wheat, barley, and rye. According to the latest 2025 report from the joint FAO/WHO experts, Codex has removed the reference dose for wheat alone, now specifying only cereals containing gluten for(wheat, barley, and rye). The presence of two different reference doses for wheat in Table 4.3.1 may lead to uncertainty regarding PAL labeling. Further consultation is recommended to clarify further PAL action levels.</p> <p>This raises a question regarding clarity in the general standard for the labeling of pre-packaged foods (GSLPF), specifically section 4.2.1.4. The section references cereals containing gluten (wheat, barley, and rye) but does not address IgE mediated wheat allergy. Further discussion and a decision are required to determ</p>	
<p>IFT congratulates CCFL on the progress made toward defining how to approach Precautionary Allergen Labeling (PAL) and believes the work is almost ready to go to CAC for approval with a few additional refinements outlined below.</p> <p>We suggest that Footnote 3 of the guidelines should be revisited. It is unclear why the 50th percentile for food consumption on a single eating occasion has been proposed for the determination of an action level for an allergenic food. It would seem more appropriate to suggest a higher percentile consumption figure to ensure a greater proportion of the potentially allergenic populations are protected in realistic exposure scenarios. In addition, clarification/guidance should be included on how to obtain appropriate food consumption data for determining action levels in a particular country and on how to proceed if those data are not available.</p> <p>We also consider that it would be appropriate under Section 4.2 of the draft guideline to include reference to the general principles of risk analysis set out in Section 4 “Risk Analysis” of the Codex Procedural Manual. The physical Working Group due to be held before CCFL could further consider whether a particular sub-section of Section 4 of the Procedural Manual.</p> <p>We welcome the revision of the table to reflect the outcome of the “Ad hoc joint FAO/WHO expert consultation on risk assessment of food allergens – reference dose(s) for cereals containing gluten and gluten” (https://openknowledge.fao.org/items/2ed0849b-cd11-4c94-881f-d1b41dbc215f) . However, we consider that the table is still unclear in terms of which RfD should be adopted for wheat to ensure consumers are protected. We suggest, therefore, that the table is reconsidered at the forthcoming physical working group scheduled for 10 May.</p> <p>A possible solution to address the current confusion may be to delete the right hand column (Total mg Gluten from Cereal containing gluten) and to also replace the current RfD of 5 for wheat in the column “mg protein from the allergenic food” with the value of 4 (and specifically referencing gluten) given this would be protective of those sensitive to gluten and those who are allergic to protein from wheat. The reference to barley and rye could then be included alongside the me</p> <p>We welcome the revised wording in section 5 of the document.</p> <p>Section 5.2bis is clear in terms of where any PAL statement should be placed, both for foods where there is an exemption from declaration of an ingredient list and those that have them.</p> <p>We do not have any comments on the inclusion of the example to describe “equivalent words” under section 5.2.1</p> <p>In relation to the footnotes 4bis and 4ter, these seem appropriate in terms of clarifying when certain wording should be used in a gluten declaration.</p> <p>We do not consider that the revised text is ready for advancement to Step 8 in its current form.</p> <p>It should be reviewed further and revised by the physical working group such that it may be ready for endorsement by CCFL at the plenary meeting.</p>	IFT
Indonesia generally supports the draft Guidelines on the Use of Precautionary Allergen Labelling (PAL) for adoption at Step 8.	Indonesia

COMMENTS	MEMBER / OBSERVER
<p>ISDI appreciates the significant progress made by the Electronic Working Group (EWG) in developing the draft Guidelines on the Use of Precautionary Allergen Labelling. The organisation commends the collaborative efforts that have contributed to practical recommendations that support improved allergen risk management at the international level.</p> <p>ISDI welcomes most of the changes and conclusions reached during the EWG process. At the same time, ISDI would like to offer several comments and suggestions aimed at ensuring that the guidance is comprehensive and sufficiently protective of sensitive consumer populations.</p>	ISDI
<p>Regarding Table 4.3.1, ISDI recommends replacing the dash (“–”) used for barley and rye in the first column with the notation “ND” (Not Determined).</p> <p>In addition, ISDI proposes revising footnote 3bis to read:</p> <p>“Wheat, rye, and barley are cereals containing gluten and have a gluten RfD assigned. A specific RfD is established for wheat (as total wheat proteins), but not for barley and rye due to insufficient data (ND).”</p> <p>ISDI believes that this refinement improves clarity in several ways. First, it communicates that insufficient data prevents determination of the RfD for barley and rye. It also underscores that these cereals must not be disregarded when risk assessment relies on protein content rather than gluten levels. Finally, it clearly conveys that the gluten RfD pertains to wheat, barley, and rye rather than only barley and rye.</p> <p>ISDI believes that further discussion is needed, particularly regarding the assessment of whether alternative or population-specific RfDs may be necessary for the most sensitive populations. Therefore, we do not support advancing the text to Step 8. ISDI reiterates its strong support for the development of harmonised, evidence based guidelines on the use of precautionary allergen labelling.</p> <p>The proposed adjustments are intended to enhance clarity, promote consistency, and ensure the guidance adequately reflects the needs of sensitive populations including infants, young children, and individuals relying on foods for special dietary uses.</p>	ISDI
<p>Le Maroc appuie le projet de directives sur l'étiquetage de précaution relatif aux allergènes et son avancement à l'étape 6. Le Maroc soutient l'harmonisation internationale de ces pratiques tout en soulignant la nécessité de tenir compte des contraintes des pays en développement en matière de capacités analytiques</p>	Morocco
<p>Norway would like to thank the United States of America, Australia, and the United Kingdom for their efforts in compiling relevant scientific information and expertise and translating this work into concrete amendments to the draft guidelines on the use of precautionary allergen labelling (PAL), as well as for providing the opportunity to comment.</p>	Norway
<p>Paraguay considera qíue el documento esta listo para avanzar al tramite 8</p>	Paraguay
<p>South Africa position:</p> <ul style="list-style-type: none"> • South Africa supports the updated configuration of the reference dose (RfD) table in Section 4.3.1, including the associated footnotes, as it reflects a more structured and science-based approach to precautionary allergen labelling. <p>Rationale:</p> <ul style="list-style-type: none"> • The revised table improves clarity and consistency in the presentation of allergen reference doses, it supports a harmonised risk-based approach for decision-making on PAL and strengthens the scientific basis for decision-making by competent authorities, when applying risk management measures based on FAO/WHO expert advice on allergen reference doses. • The inclusion of cereals containing gluten and the related footnotes makes the guideline clearer and more complete, ensuring better alignment between wheat allergy and coeliac disease considerations, while also making it easier for competent authorities to apply in practice. <p>5.2bis Where a food is exempt from declaring a list of ingredients, and no list of ingredients is present, PAL shall be declared in a prominent position on the label. Where a separate</p>	South Africa

COMMENTS	MEMBER / OBSERVER
<p>statement made in accordance with Section 8.3.2.1 of the GSLPF exists on the label, the PAL declaration shall be in the same field of vision as the separate statement.</p> <p>SA position</p> <ul style="list-style-type: none"> • We support the content of the updated text in section 5, together with its footnotes. • We consider both sections 5.2 and 5.2bis necessary • It is recommended that section 5 incorporate all 5 clauses and be numbered accordingly <p>Rationale:</p> <ul style="list-style-type: none"> • Section 5.2bis improves the visibility and placement of precautionary allergen labelling (PAL) when no ingredient list is present. This provision strengthens consumer protection by ensuring clear and accessible allergen information for individuals with food allergies and coeliac disease, promotes consistency with the GSLPF (CXS 1-1985) and enhances harmonised international labelling practices, while remaining practical for industry implementation. <p>5.2.1 A PAL statement shall commence with the words 'May contain' (or equivalent words such as 'may be present') and include the identified declare the allergenic food(s) using the specified names for the foods and ingredients as listed in sections 4.2.1.4 and where applicable 4.2.1.5 of the General Standard for the labelling of pre-packaged foods (CXS 1-1985).4bis,4ter</p> <p>SA Position</p> <ul style="list-style-type: none"> • SA supports the amendments in 5.2.1 <p>Rationale:</p> <ul style="list-style-type: none"> • Section 5.2.1 provides a standardised approach for declaring precautionary allergen labelling (PAL). This provision strengthens consumer protection by improving clarity, consistency, and recognisability of allergen information for individuals with food allergies and coeliac disease and promotes harmonisation of labelling practices. <p>4bis When gluten is present above the action level and the source of the gluten cannot be verified by risk assessment, the specified names of all cereals containing gluten (i.e. wheat, barley, and rye) shall be included in the PAL statement.</p> <p>4ter In addition to the specified name of wheat, rye, and barley, the word 'gluten' may be used.</p> <p>SA Position</p> <ul style="list-style-type: none"> • SA supports retention of both 4bis and 4ter footnotes <p>Rationale:</p> <ul style="list-style-type: none"> • Footnotes 4bis and 4ter strengthen the clarity, consistency and consumer understanding of precautionary allergen labelling (PAL) for cereals containing gluten, while improving transparency for consumers with food allergies and coeliac disease. • Footnote 4ter provides flexibility to include the term "gluten" alongside specified cereal names, which enhances consumer understanding and supports clearer risk communication without compromising existing allergen declaration requirements. <p>SA position</p> <ul style="list-style-type: none"> • South Africa supports the advancement of the draft guidelines to Step 8 of the Codex Step Process, subject to the consideration of proposed amendments to improve clarity. <p>Rationale:</p> <ul style="list-style-type: none"> • The draft guidelines are well-developed, scientifically informed and reflect extensive consensus-building within the EWG. They provide a clear, risk-based and practical framework for precautionary allergen labelling that enhances consumer protection while supporting international harmonisation. <p>South Africa also proposes the following amendments to Appendix 1</p>	

COMMENTS	MEMBER / OBSERVER
<p>SA position and rationale:</p> <ul style="list-style-type: none"> SA propose the following amendments to purpose, section 4.3.2 and 4.3.3, to improve the overall readability of the texts. <p>Purpose</p> <ul style="list-style-type: none"> To facilitate a consistent and harmonized approach to the effective use of precautionary allergen labelling (PAL), enabling clear communication to consumers with food allergies or coeliac disease about the risk of unintended presence of food allergens due to cross-contact with allergenic food. <p>Section 4.3.2</p> <ul style="list-style-type: none"> Where a reference dose is not established for a particular food allergen, as per table 4.3.1 above, regional/national competent authorities can establish a reference dose consistent with recognized principles for the purposes of determining an action level. <p>Section 4.3.3</p> <ul style="list-style-type: none"> If a PAL statement for cereal(s) containing gluten appears on the label, then the term “gluten free” shall not be used on the label 	
<p>The new design of the table and the fact, that reference doses of total wheat protein as well as gluten from all gluten containing cereals are given, makes the table more precise and easier to follow. Footnote is easy to understand and explains perfectly the background of the changes versus old versions.</p> <p>All the texts have the needed clarity.</p> <p>Ready for advancement to next Step. However, is there no conflict that Codex will face in relation to PAL standards which might ultimately preclude the use of a gluten free claim, even the <20 ppm total gluten threshold defined in the Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXS 118 1979) is met? Is an update of that standard needed to clarify that the reference dose for gluten (4 mg per portion per eating occasion) must also be taken into account?</p>	EFAD
<p>The UK believes the text is ready for advancement to Step 8 and can support this recommendation, based on the text below.</p>	United Kingdom
<p>The United States appreciates the work of the co-chairs and EWG members during the intersessional period and believes good progress has been made on the sections that remained for consideration following CCFL48. The United States notes the broad support received during the EWG for the reference doses in section 4.3.1 and looks forward to productive discussions on any outstanding issues during the Physical Working Group. The United States believes that with a few final clarifications and edits during the PWG and plenary sessions, these draft guidelines will be ready for advancement to step 8.</p>	USA
<p>Zambia supports cross-reference to the General Standard for the Labelling of Prepackaged Foods for PAL requirements and footnotes. We also supports the 4 mg threshold for gluten in cereal-based commodities and calls for the need to have more consumer information on labelling requirements at food purchase points. In this view, Zambia supports advancement of the annex on precautionary allergen labelling guidelines from Step 7 to Step 8 and supports removal of footnote and review of text on language acceptability and general criteria</p> <p>The RfDs were established on the basis of risk-based principles, derived from global clinical data characterising reactions to known quantities of proteins from allergenic foods, and set at exposure levels intended to limit appreciable health risks or adverse reactions in sensitive individuals. Sections 8.1.1, 8.1.2, 8.1.3 and 8.2 of the General Standard for the Labelling of Prepackaged Foods meet the specific requirements for PAL.</p>	Zambia

SPECIFIC COMMENTS

COMMENTS	MEMBER / OBSERVER
DRAFT ANNEX TO THE GENERAL STANDARD FOR THE LABELLING OF PRE-PACKAGED FOODS (CXS 1-1985): GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING	
DEFINITIONS	
<p>Préciser que les mentions de précaution ne doivent être utilisées qu'après évaluation rigoureuse des risques et ne peuvent se substituer aux bonnes pratiques de fabrication (BPF).</p> <p>Justificatif: L'utilisation abusive de mentions telles que 'peut contenir...' réduit leur efficacité et crée de la confusion chez le consommateur. Des critères d'utilisation explicites sont indispensables.</p>	Morocco
GENERAL PRINCIPLES	
ICA Comment: ICA is aligned with the updates proposed in the PAL guidelines related to Section 4.3, 4.4, as well as 5 (see comments below).	ICA
4.1 ...unintended presence of <u>a</u> food allergens <u>allergen(s)</u> caused by cross-contact...	European Union
<p>4.2 As a member committed to harmonising national regulations with international Codex standards in accordance with the WTO SPS Agreement, Thailand places great importance on the practical implementation of these texts. To ensure that this draft document can be effectively applied, we propose adding a reference to the upcoming "Report of the FAO/WHO Experts: Part 6 on guidance on qualitative risk assessment."</p> <p>This reference can be placed in square brackets pending its official publication. Having access to the details in Part 6 is essential for national authorities to effectively educate stakeholders and communicate the necessary information for real-world application. Therefore, to ensure that member countries are fully capable of implementing this standard as intended, we believe it is necessary to await the official release of Part 6 prior to the final adoption of this draft.</p>	Thailand
4.2 Paraguay de acuerdo con el punto	Paraguay
4.2 The Republic of Korea recognizes the intent of establishing a quantitative Reference Dose (RfD) to prevent the misuse of PAL statements. However, taking into account the analytical challenges and cost burdens that vary according to company size and national infrastructure capacity, the Republic of Korea proposes that qualitative approaches remain the primary criterion for PAL use, with RfD serving as a reference standard.	Republic of Korea
<p>4.3 ...demonstrated that unintended food allergen presence of a food allergen(s) cannot be mitigated to a level at or below the action level^[3] for a-the allergenic food allergen-based on the...</p> <p>The EUMS support the changes proposed in Principle 4.3. These guidelines aim to prevent the unnecessary overuse of PAL and promote its harmonised application. The EUMS offer some suggestions on the text, to ensure consistency with the previous paragraphs.</p>	European Union
4.3 The United States supports the proposed amendment to section 4.3. The term [should only] reflects the needed flexibility to enable different regulatory options while making a recommendation that a PAL statement should only be used when unintended allergen presence cannot be mitigated below the action levels. The United States supports the amended text in footnote 3 as it aligns with the terms used in the expert consultation reports.	USA
4.3 The Republic of Korea respectfully proposes that the word "only" be deleted from the phrase "should only," thereby amending the text to state "should". This proposal is put forward in recognition of the divergence in national circumstances and regulatory frameworks across member countries, with a view to ensuring more flexible and accommodating application of the provision.	Republic of Korea
[4.3 PAL should-shall only be used...	AOECS

COMMENTS	MEMBER / OBSERVER
AOECS wants to emphasize and reiterate that we are in favour of the word 'shall'. Our aim is informed decision making by people with coeliac disease based on sound information. That means that either over or under use of PAL should be avoided as much as possible.	
<p>4.3 Australia appreciates the effort of the EWG Chairs to obtain a compromise text for section 4.3. However, Australia reiterates that our preference is for the words 'shall only' rather than 'should only' in this section of the draft PAL guidelines.</p> <p>The Ad Hoc Joint FAO/WHO expert consultation's report (part 3) stated that PAL should be considered when the unintended allergen presence (UAP) is above the action level for the respective allergen, and that PAL should not be used when UAP is below the action level. The recommendations of this report should be followed wherever possible in developing this guideline, as they have been prepared by international allergy experts. Australia also considers that allowing the use of PAL in circumstances where the UAP is below the action level would result in the overuse of PAL, restricting food choices for individuals with a food allergy without any additional health protection.</p> <p>Australia considers the use of the words 'shall only' would more strongly reflect the recommendations of the expert consultation.</p> <p>Footnote 3: Action level (mg total protein from the allergenic food / kg food) = Reference dose (mg total protein from the allergen allergenic food) / Amount of the food (kg). The amount of food should be established based on the quantity that can reasonably be expected to be consumed on a single eating occasion preferably using the 50th percentile. Australia supports the update to footnote 3 of the PAL guidelines to include the words 'allergenic food'.</p>	Australia
Section 4.3 should not be indented relative to Section 4.2, in order to maintain consistency in the document structure and hierarchy.	Food Industry Asia
4.3 should only be used when it is demonstrated through documented risk assessment that unintended food allergen presence cannot be reduced to a level or below the action level[3]	Sudan
<p>4.3 Footnote 3 ...of the food <u>consumed</u> (kg). The amount of food <u>consumed</u> should be established...</p> <p>Canada suggests the addition of the word "consumed" to footnote 3 from Section 4.3, for clarity, so that this footnote would read :</p> <p>Action level (mg total protein from the allergenic food / kg food) = Reference dose (mg total protein from the allergen allergenic food) / Amount of the food consumed (kg). The amount of food consumed should be established based on the quantity that can reasonably be expected to be consumed on a single eating occasion preferably using the 50th percentile.</p>	Canada
<p>4.3 Paraguay de acuerdo con la propuesta</p> <p>Footnote 3. Paraguay concide con llas modificaciones del texto</p>	Paraguay
<p>4.3 ...cannot be mitigated <u>based on the findings of a qualitative risk assessment, or cannot be reduced</u> to a level at or below the action level^[3] for a food allergen based on the reference doses in the table at 4.3.1. <u>Furthermore, the application of such levels should take into account the availability of performance criteria for analytical methods endorsed by CCMAS.</u></p> <p>Thailand recognises the scientific basis for establishing the reference doses (RfDs) listed in Section 4.3.1. However, we are concerned that RfDs based on the ED05 level may not adequately protect highly sensitive sub-populations in Thailand. This could also expose food business operators to potential legal liabilities. Additionally, transitioning to this new approach will increase the operational and financial burden on our small and micro food manufacturers, whose businesses are highly vulnerable.</p> <p>Regarding testing methods, Thailand notes that there are ongoing limitations regarding the reliability and precision of current test kits when used for regulatory enforcement in both domestic and international trade.</p> <p>Furthermore, Thailand's national regulation lists molluscs as an allergen that requires mandatory labelling. Since there is currently no RfD established for molluscs, implementing the proposed RfD framework for Precautionary Allergen Labelling (PAL) would require us to</p>	Thailand

COMMENTS	MEMBER / OBSERVER
<p>conduct independent research to establish our own RfD, as outlined in Section 4.3.2. Thailand currently lacks the resources to do so. Implementing the RfD framework without addressing all nationally regulated allergens would lead to regulatory inconsistencies.</p> <p>Given these rationales, Thailand proposes removing the RfDs from this core document and publishing them as a separate information document instead. This approach would also make it easier to revise and update the RfDs in the future.</p> <p>In addition, Thailand proposes amendments to Section 4.3 to ensure a stepwise approach that considers the findings of qualitative risk assessments when deciding whether PAL should be applied.</p> <p>Finally, we propose adding a clause referring to the availability of performance criteria for analytical methods endorsed by CCMAS. Including this reference to CCMAS would be highly beneficial in reducing trade disputes caused by the use of different analytical methods among manufacturers.</p>	
<p>4.3 Brazil does not support retaining the word “only” in Section 4.3. In Brazil’s view, the inclusion of this term makes the provision unnecessarily restrictive and may lead to the interpretation that PAL would not be appropriate whenever unintended food allergen presence is estimated or measured at or below the action level. This would go beyond providing guidance on when PAL should be used and could operate, in practice, as a de facto restriction on the use of PAL in justified cases.</p> <p>Brazil supports efforts to reduce the unnecessary overuse of PAL. However, this objective is already addressed by Sections 4.1 and 4.2, which require allergen management practices and a risk assessment-based decision on the use of PAL.</p> <p>In this context, Section 4.3 should therefore not be framed in a way that further restricts the use of PAL to the point of weakening its protective function. PAL must remain a meaningful, trusted and effective tool to communicate residual risk to allergic consumers in situations where unintended allergen presence cannot be reliably excluded or where relevant uncertainty remains.</p> <p>Brazil is particularly concerned because an interpretation that discourages PAL solely because the estimated or measured level is at or below the action level may leave some consumers exposed to products that do not carry PAL but may still trigger adverse reactions. This is especially relevant for highly sensitive individuals and for children, who rely on PAL not only to avoid life-threatening reactions but also to avoid other adverse health effects that may significantly affect health and quality of life.</p> <p>The proposed text may also weaken consumer confidence in PAL and in allergen labelling more broadly, if the absence of PAL is understood as meaning the absence of relevant risk in all circumstances.</p> <p>Brazil also notes that an excessively rigid provision may create disproportionate burdens for food business operators, particularly small and medium-sized enterprises, as well as for competent authorities, especially where technical and analytical capacity is limited. Such an approach may hinder implementation, use and enforcement of PAL, rather than improve consumer protection. This concern is particularly relevant where risk assessment may need to rely on qualitative elements, residual uncertainty, or other evidence beyond analytical quantification alone.</p> <p>Brazil further notes that the current analytical landscape does not support an overly restrictive use of PAL based primarily on action levels and reference doses. As reflected in the CCMAS response, methods with multi-laboratory validation or performance-tested status were identified in Table 1 for crustacea, egg, gluten, milk and peanut. By contrast, fish, sesame, almond, cashew, hazelnut and walnut appear only in Table 2, and no methods were submitted for pecan or pistachio. These examples illustrate the current limitations in the availability, accessibility and level of validation of analytical methods across allergens. In Brazil’s view, while analytical methods can be useful to inform PAL-related risk assessment in specific cases, these limitations weigh against linking PAL too restrictively to exclusively quantitative criteria.</p> <p>Brazil’s proposed amendment to Section 4.3 is:</p>	<p>Brazil</p>

COMMENTS	MEMBER / OBSERVER
<p>PAL should only be used when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1.</p> <p>Brazil considers that this minimal amendment preserves the structure and overall intent of the current draft, continues to discourage unnecessary overuse of PAL, and avoids the unintended effect of treating the action level as an absolute barrier to PAL in all other circumstances. It also better preserves the protective function of PAL as a risk communication tool and allows the necessary flexibility for proportionate implementation in different regulatory and operational contexts.</p> <p>Footnote 3 Brazil does not support the use of the 50th percentile as the preferred basis for establishing the amount of food consumed on a single eating occasion for the derivation of action levels. In Brazil's view, this approach may underestimate exposure for allergic consumers who consume larger quantities of specific foods and may therefore result in action levels that are not sufficiently protective in practice. Considering the acute nature of allergic reactions, Brazil considers that a higher percentile of consumption is more appropriate for this purpose.</p> <p>Brazil recognizes the scientific rationale for considering food consumption in the derivation of action levels. However, the current wording gives undue prominence to the 50th percentile, without sufficiently recognizing that higher percentiles may be more appropriate from a public health perspective. For foods commonly consumed in larger portions by specific population groups, the use of a higher percentile would provide a more protective basis for action level setting.</p> <p>Brazil further notes, as additional supporting evidence, that WHO guidance on acute dietary exposure assessment for chemical hazards (1) uses the concept of large portion consumption based on the 97.5th percentile of consumers only. While recognizing the different regulatory context, Brazil considers that this provides a useful methodological precedent for preferring a high-percentile consumer-based approach in the derivation of action levels for PAL.</p> <p>Brazil is also concerned that the current approach may result in different action levels across countries, or even across food business operators, for the same product and the same allergenic food, simply because consumption assumptions differ. Since the action level is derived by dividing the reference dose by the amount of food consumed, the use of median consumption may amplify this variability and lead to inconsistent labelling outcomes across markets, regulatory uncertainty, consumer confusion, operational difficulties for manufacturers operating in multiple markets, and unnecessary barriers to trade.</p> <p>Brazil therefore considers that footnote 3 should not present the 50th percentile as the preferred basis for determining the amount of food used in the derivation of action levels. In Brazil's view, the preferred basis should be the 97.5th percentile of consumers only, which better reflects high-end acute consumption and provides a more protective and more appropriate basis for action level setting.</p> <p>Brazil's proposed amendment to footnote 3:</p> <p>3 Action level (mg total protein from the allergenic food / kg food) = Reference dose (mg total protein from the allergenic food) / Amount of the food (kg). The amount of food should be established based on the quantity that can reasonably be expected to be consumed on a single eating occasion, preferably using the 50 97.5th percentile of food consumption data for consumers only.</p> <p>(1) WHO. Principles and Methods for the Risk Assessment of Chemicals in Food. Environmental Health Criteria 240. Geneva: World Health Organization; 2009. ISBN 978 92 4 157240 8.</p>	
<p>Table 4.3.1</p> <p>ICA Comments: In Table 4.3.1 presents a reference dose (RfD) of 5.0 mg for total protein in wheat and 4.0 mg for total gluten from cereals containing gluten-specifically, wheat, barley, and rye. According to the latest 2025 report from the joint FAO/WHO experts, Codex has removed the reference dose for wheat alone, now specifying only cereals containing gluten</p>	ICA

COMMENTS	MEMBER / OBSERVER
for(wheat, barley, and rye). The presence of two different reference doses for wheat in Table 4.3.1 may lead to uncertainty regarding PAL labeling. Further consultation is recommended to clarify this issue.	
<p>Table 4.3.1</p> <p>The EUMS welcome the proposed presentation of the table outlining a reference dose specific to wheat. This format of the table ensures that IgE-mediated wheat allergy is accurately and distinctly represented. Furthermore, the introduction of a reference dose of 4 mg for gluten in foods as total gluten from wheat, rye, and barley makes more evident that the 4 mg concern the total gluten exposure.</p> <p>The EUMS have no objection to the new footnote 3bis. However, the EUMS would like to offer the suggestions below aiming at enhancing the readability of the text:</p> <p>"Footnote 3bis: Rye and barley are gluten-containing cereals identified as cereals of concern to coeliac disease and have therefore a single gluten RfD assigned, expressed as total gluten from wheat, rye and barley. Wheat is a cereal of concern for both coeliac disease and IgE-mediated wheat allergy. Consequently, it contributes to the single gluten RfD, while it has also an RfD for total protein assigned."</p>	European Union
<p>Table 4.3.1</p> <p>Footnote 3bis: Rye and barley are cereals containing gluten and so have a gluten RfD assigned. Wheat is a cereal identified as a priority food of concern for both IgE-mediated allergies and coeliac disease, and so has an RfD for total protein as well as an RfD for gluten.</p> <p>Australia supports the table as proposed by the EWG Chairs, and agrees with the inclusion of both the 4.0 mg total gluten RfD for wheat, barley and rye, as well as retaining the 5.0 mg total protein RfD for wheat. Wheat is associated with IgE-mediated allergic reactions independent of its gluten content and should have its own separate RfD that can be used in decisions on when a PAL statement for wheat is to be used.</p> <p>Australia understands that the FAO/WHO expert consultation has recommended the RfD for gluten would replace the existing RfD for wheat in Table 4.3.1.</p> <p>Australia notes estimating cross contact allergen concentrations may not include analytical testing for wheat or gluten directly. A manufacturer should be aware of the need to separately trace the potential presence of both wheat and gluten (from cereals containing gluten) cross contact through the supply chain and the production process. Separate RfD values make it clear that separate risk assessments should be undertaken for both wheat and gluten.</p> <p>Australia supports the footnote 3bis although we propose the following minor edits for clarity:</p> <p>Footnote 3bis: Rye and barley are cereals containing gluten and so have a gluten RfD assigned. Wheat is a cereal identified as a priority food of concern for both IgE-mediated allergies and coeliac disease, and can be assessed against an RfD for total wheat protein as well as an RfD for gluten</p> <p>Australia suggests an additional footnote may be required to explain that the RfD for gluten refers to the total gluten present in the food (not separate values for gluten from wheat, gluten from barley and gluten from rye resulting in a total RfD of 12 mg</p>	Australia
<p>Table 4.3.1</p> <p>FIA would like to highlight that the reference doses (RfDs) should apply to the general population only. These values are not intended for foods for special medical purposes, infant formula, and follow-up formula.</p> <p>This distinction is important as the General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985) and the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CXS 72-1981) already contain specific provisions and make reference to the GSLPF, ensuring that these product categories are appropriately regulated under separate frameworks.</p>	Food Industry Asia
Table 4.3.1	Canada

COMMENTS	MEMBER / OBSERVER
<p>Canada supports the changes to Table 4.3.1 and the addition of footnote 3bis which keep wheat listed as an allergenic food as well as a cereal containing gluten and clarifies that there are two RfDs for wheat, one as an allergenic food and one as a source of gluten.</p> <p>Canada suggests that there may be a simpler way to express this in the table by moving the gluten RfD down and having it below the Allergenic Food RfDs.</p>	
<p>Table 4.3.1</p> <p>The United States supports the proposed Reference Doses and amendments to Table 4.3.1. We support the amendments to the column headings to ensure alignment with terms used in the expert consultation reports. The United States supports adopting the proposed reference doses set at the ED05 as recommended by the expert consultation as the reference doses provide appropriate protection for persons with both IgE-mediated food allergies and those sensitive to gluten. The thresholds enable appropriate risk assessment and when necessary, the use of quantitative testing as part of risk assessment as analytical test methods are available to measure these threshold values in foods. This has been confirmed by the response from CCMAS. In general, the United States supports including 5.0 mg total protein in column 1 for Wheat as including the value ensures that wheat allergy remains a priority. The United States also supports the 4 mg total gluten reference value for use in risk assessment of unintended presence of cereals containing gluten as proposed by the experts. Finally, the United States supports footnote 3bis as it provides needed context to the table values and their application in precautionary allergen labelling.</p>	USA
<p>Table 4.3.1</p> <p>FoodDrinkEurope supports the establishment of harmonised reference doses based on ED05 values as a scientifically robust basis for the application of PAL</p> <p>Consistent with our previous submission, FoodDrinkEurope considers that further clarification is needed regarding the presentation and interpretation of cereals containing gluten in Table 4.3.1.</p> <p>In particular, the current configuration, which combines cereal-specific reference doses expressed as total protein (e.g. wheat) with a reference dose expressed as total gluten from cereals containing gluten, may lead to ambiguity in interpretation and application.</p> <p>This includes, in particular:</p> <ul style="list-style-type: none"> • uncertainty regarding how the gluten-based reference dose should be applied in relation to cereal-specific entries; • the potential for multiple counting of gluten from different cereal sources; and • the creation of analytically complex or impracticable PAL scenarios. <p>FoodDrinkEurope therefore considers that clearer explanation is needed on how these elements should be applied in practice, including how the gluten-based reference dose relates to cereal-specific entries and how this should be reflected in risk assessment and PAL decisions.</p> <p>Additional clarification would also be beneficial regarding the scientific basis and assumptions underlying the reference doses, including conversion factors and their implications for implementation. This is particularly relevant in cases such as oats, where the relationship between cereal classification and actual gluten content may lead to inconsistent or potentially misleading outcomes if not clearly addressed.</p> <p>FoodDrinkEurope further emphasises the importance of ensuring that the framework remains both protective and operationally realistic, taking into account analytical feasibility and the capabilities of current methodologies.</p> <p>FoodDrinkEurope also highlights the importance of ensuring that the introduction of reference doses does not lead to unintended interpretations that would shift the focus from a risk assessment-based approach to routine analytical testing. In this context, it should be clearly reinforced that PAL decisions are to be based on appropriate allergen risk assessment and management, rather than on systematic end-product testing, in line with Codex principles.</p>	FoodDrinkEurope

COMMENTS	MEMBER / OBSERVER
<p>Table 4.3.1</p> <p>Brazil considers that Section 4.3.1 should remain in square brackets at this stage. In Brazil's view, final consideration of this table would be premature while the full official reports of the two most recent FAO/WHO expert consultations that are directly relevant to the unresolved provisions of the draft are still not available.</p> <p>Brazil is also concerned that the current treatment of wheat and gluten in Section 4.3.1 remains unclear and may create confusion in implementation. The current draft table retains a reference dose of 5 mg total protein for wheat, while also including a 4 mg gluten reference dose for barley and rye, together with footnote 3bis explaining that wheat has both a total protein RfD and a gluten RfD. However, the most recent FAO/WHO summary on cereals containing gluten states that, for guidance on PAL, the previously established reference dose of 5 mg total protein for wheat should be replaced with a reference dose of 4 mg gluten.</p> <p>Brazil further notes that this issue is not merely editorial. CCMAS stated that the methods available for gluten in Table 1 lack explicit association to the specific food sources of gluten, such as wheat, barley and rye. The FAO/WHO summary likewise states that currently available analytical methods for gluten quantification cannot distinguish between gluten sources, which limits the precision of risk assessment. In this context, retaining a distinct 5 mg total protein reference dose for wheat in the table, while the analytical basis referred to by CCMAS is essentially gluten measurement, may create uncertainty as to which parameter should actually be used in PAL-related decision-making and how the table should be interpreted in practice.</p> <p>Brazil therefore recommends that Section 4.3.1 remain in square brackets pending publication of the full FAO/WHO reports and further consideration by the Committee. Brazil also considers that the current treatment of wheat and gluten in the table should be revisited, as the maintenance of a 5 mg reference dose for wheat appears difficult to reconcile with the more recent FAO/WHO recommendation to replace that value, for PAL purposes, with a 4 mg gluten reference dose.</p>	Brazil
<p>Table 4.3.1 • It is recommended to clarify that, where preparation or reconstitution instructions are provided, the application of action levels should be based on the food as consumed, rather than solely as sold. This is particularly important for products not consumed in their marketed form (e.g., dry mixes, powdered beverages), to ensure that exposure assessments more accurately reflect actual consumption patterns. • Furthermore, additional clarification on the application of the action level approach to single-serve versus multi-server products would be beneficial. The quantity consumed during a single eating occasion may vary significantly depending on the product type and target consumer group. Such guidance would support greater consistency in the practical implementation of PAL across different food categories. Such clarification would support greater consistency in the practical application of PAL across different food categories.</p>	United Arab Emirates
<p>Table 4.3.1</p> <p>Encourager la poursuite des travaux scientifiques pour établir des seuils d'action harmonisés fondés sur les données de prévalence et les doses réactogènes. justificatif : L'absence de seuils harmonisés conduit à des pratiques hétérogènes préjudiciables aux échanges commerciaux et potentiellement trompeuses pour les consommateurs.</p>	Morocco
<p>Table 4.3.1</p> <p>ISDI acknowledges that the proposed RfDs represent an important and positive step towards the international harmonization of allergen risk assessment and supports continued research in this area.</p> <p>However, ISDI would welcome further guidance from the FAO-WHO expert committee, particularly in light of the FAO/WHO Expert committee's observation that the milk data suggested that infants and young children may exhibit greater sensitivity than older children. Given the potentially heightened sensitivity of individuals consuming foods for special dietary uses, including infants and patients, ISDI recommends that, where data are available, these populations be specifically evaluated by the expert committee to determine whether an alternative or population-specific RfD may be warranted. Additionally, ISDI notes that the</p>	ISDI

COMMENTS	MEMBER / OBSERVER
<p>original VITAL Allergen risk assessment system explicitly excluded foods for special medical purposes and products formulated for infants.</p> <p>Therefore, ISDI reiterates that populations with heightened sensitivity be specifically evaluated by the expert committee whenever sufficient data exist.</p>	
<p>Table 4.3.1</p> <p>Comments: In general, ICGMA is aligned with the updates proposed in the PAL guidelines related to Section 4.3, 4.4 as well as 5.</p> <p>In Table 4.3.1 presents a reference dose (RfD) of 5.0 mg for total protein in wheat and 4.0 mg for total gluten from cereals containing gluten-specifically, wheat, barley, and rye. According to the latest 2025 report from the joint FAO/WHO experts, Codex has removed the reference dose for wheat alone, now specifying only cereals containing gluten for(wheat, barley, and rye). The presence of two different reference doses for wheat in Table 4.3.1 may lead to uncertainty regarding PAL labeling. Further consultation is recommended to clarify further PAL action levels.</p> <p>This raises a question regarding clarity in the general standard for the labeling of pre-packaged foods (GSLPF), specifically section 4.2.1.4. The section references cereals containing gluten (wheat, barley, and rye) but does not address IgE mediated wheat allergy. Further discussion and a decision are required to determine if revisions are necessary prior to advancing to step 8 and finalizing the guidelines. One recommendation is to include a special section for Celiac Disease, as is the case for sulfites from true allergies.</p>	ICGMA
<p>Table 4.3.1</p> <p>AOECS request a clarification regarding oats. Oats are listed in the General Standard for the Labelling of Pre-packaged Foods as a non-priority allergen (section 4.2.1.5). Oats are the only allergen for which no reference dose (RfD) has been established in Table 4.3.1. Because the status of oats is not explicitly addressed in the Guidelines for PAL, this may create confusion.</p> <p>Section 4.3.2 of the proposed Guidelines for PAL states that, if no RfD has been established, regional or national competent authorities may establish an RfD themselves. This creates the risk that an RfD for oats could still be introduced locally, with the result that PAL for oats would start to be used. This is explicitly not in line with the FAO/WHO advice. Part 5 of the FAO/WHO report explicitly advises *against* establishing an RfD for oats.</p> <p>To prevent these undesirable interpretations and local differences, it is therefore essential to clarify explicitly the status of oats within PAL.</p>	AOECS
<p>Table 4.3.1</p> <p>For further clarity, Thailand proposes separating the rows for barley and rye in the first and second columns, and inserting a hyphen for each commodity individually in the second column, while maintaining the current merged format for the final column.</p>	Thailand
<p>Table 4.3.1</p> <p>ICBA believes having two different proposed reference doses for wheat could be confusing. Can it be confirmed that a 4 mg RfD is protective for the 5 mg wheat/barley/rye total protein RfD (taking into account that gluten does not cover all proteins)? If the response is that it is, ICBA could support having a single RfD (4 mg) to be accompanied by a comment that it is protective for people with coeliac as well as IgE mediated allergies.</p>	ICBA
<p>4.3.2 ...for a particular <u>allergenic</u> food allergen in the table to 4.3...</p> <p>The EUMS support paragraph 4.3.2. The purpose of this section 4.3.2 is to enable authorities to establish reference doses for allergens that are not included in the table 4.3.1 or covered by the expert consultation's reports. The EUMS suggest the following changes to improve consistency in the text.</p>	European Union

COMMENTS	MEMBER / OBSERVER
<p>4.3.2: For allergens for which reference doses have not yet been established, it is recommended to provide additional interim guidance on the technical and procedural approaches that may be applied for risk management purposes. This would support competent authorities in making consistent decisions until internationally harmonized reference values become available, thereby reducing variability and facilitating international trade.</p>	United Arab Emirates
<p>4.3.2 Canada supports Section 4.3.2</p>	Canada
<p>4.3.3 The United States supports the proposed text as it ensures the harmonized application of a common set of reference doses internationally which is important to limit barriers to trade. The United States notes that reference values have been provided for the priority allergenic foods and regionally important allergenic foods. There is no or very limited data available for other emerging allergenic foods and until sufficient data is available from clinical challenge studies additional reference values should not be established in Codex.</p> <p>The United States agrees that, to limit consumer confusion, PAL statements for gluten containing grains and Gluten free claims should not both appear on food labels. As wheat allergy is an acute response and can be life threatening, PAL statements for wheat/cereals containing gluten should be a priority and gluten-free claims not be used in the limited cases when unintended presence of gluten cannot be mitigated below the action level but the amount of gluten is less than 20 ppm. The United States supports the recommendation that 4.3.3 as it appears here be adopted and supports the proposed edited text as it provides clarity.</p>	USA
<p>4.3.3 ...<u>cereal(s) containing gluten [appears / is used] on the label necessary, then the term “gluten free” shall not [appear/ be used] on the label [or used in labelling] the labelling.</u></p> <p>The EUMS support the addition of this provision, as it ensures the avoidance of contradictory labelling.</p> <p>However, the wording could be improved. Instead of focusing on whether a PAL statement appears or is used on the labelling, it should make the risk-based principle underpinning precautionary allergen labelling more explicit, namely that operators must first assess whether production processes effectively mitigate cross-contamination risks and determine whether a PAL statement is necessary.</p> <p>The necessity for a PAL statement on cereals containing gluten should take priority over a ‘gluten-free’ claim, as this approach offers the highest level of consumer protection. Against this background, the EUMS propose revising the text to emphasize the need or necessity for PAL, to determine whether the gluten-free statement should be used on the labelling and suggest the following modifications. The term ‘labelling’ is preferred to the term ‘label’, being broader and also better aligning with the terminology used in these guidelines.</p>	European Union
<p><u>4.3.3. If a PAL statement for cereal(s) containing gluten [appears / is used] on the label, then the term “gluten free” shall not [appear/ be used] on the label [or in labelling]labelling] alongside the claim ‘gluten free’.</u></p> <p>The current wording is framed conditionally (“if a PAL statement... then the term ‘gluten free’ shall not appear”), which clearly prevents the use of a gluten free claim when PAL is required. However, the intent of the provision is understood to be broader: foods labelled gluten free should not carry PAL for cereals containing gluten, and foods requiring such PAL should not carry a gluten free claim.</p> <p>This is important to avoid contradictory labelling and to maintain consumer confidence in gluten free claims.</p>	AOECS
<p>4.3.3 Australia supports section 4.3.3 as proposed by the EWG Chairs. Australia considers that the presence of both a ‘gluten free’ claim (in line with CXS 118-1979) and a PAL statement for gluten could confuse consumers and undermine trust in food labels. Australia considers that the requirement for a PAL statement for gluten should take precedence over a ‘gluten free’ claim, as this approach provides the greatest protection and clarity for consumers.</p>	Australia

COMMENTS	MEMBER / OBSERVER
<p>4.3.3 ...<u>cereal(s) containing gluten [appears / is used] appears on the label, then the term “gluten free” shall not [appear/ be used] on the label [or in labelling]used.</u></p> <p>Canada supports Section 4.3.3, which would prevent PAL for cereals containing gluten and gluten free claims from appearing on the same food.</p> <p>Canada prefers the words in square brackets and shortening the text as follows :</p> <p>If a PAL statement for cereal(s) containing gluten appears on the label, then the term “gluten free” shall not be used.</p>	Canada
4.3.3 Paraguay, de acuerdo con la expresion	Paraguay
4.3.3 New Zealand supports the updated text at 4.3.3. regarding the alternate words in square brackets, “appears” may read better, but we could support either text.	New Zealand
<p>4.3.3 Egypt supports the following statement:</p> <ul style="list-style-type: none"> - “used” rather than “appears” - “on the label or in labeling” rather than “on the label” or “in labelling”. <p>the proposed change "4.3.3. If a PAL statement for cereal(s) containing gluten is used on the label, then the term “gluten free” shall not be used on the label or in labelling".</p>	Egypt
4.3.3 ... <u>cereal(s) containing gluten [appears / is used] used on the label, then the term “gluten free” shall not [appear/ be used] appear on the label [or in labelling]label.</u>	Thailand
4.3.3 ICBA supports this statement because it is most protective to the consumer especially if the consumer has a wheat IgE allergy.	ICBA
<p>4.3.3 Brazil supports the inclusion of a provision to avoid contradictory labelling where a product would simultaneously carry a PAL statement for cereals containing gluten and a “gluten free” claim.</p> <p>Brazil considers that allowing both statements to appear together could confuse consumers, undermine confidence in allergen labelling, and pose particular risks to consumers with IgE-mediated wheat allergy who may interpret the “gluten free” claim as a broader safety signal.</p> <p>Brazil’s proposed amendment to Section 4.3.3:</p> <p>4.3.3 If a PAL statement for cereal(s) containing gluten [appears / is used] on the label, the term “gluten free” shall not [appear / be used] on the label or in labelling.</p>	Brazil
<p>4.4 ...accompanied<u>complemented</u> by education/information<u>education/</u> and <u>information</u> programs led by competent authorities to ensure<u>promote appropriate use of PAL by food business operators and proper</u> understanding and appropriate use of PAL interpretation by consumers, healthcare providers, food business operators, <u>and other stakeholders.</u></p> <p>The EUMS support this provision. Furthermore, the EUMS would like to suggest rephrasing.</p>	European Union
<p>4.4 PAL shallshould<u>shall</u> be accompaniedcomplemented...</p> <p>AOECS reiterates that we are in favour of the word ‘shall’ because education/information programs are crucial to ensure proper understanding and application of PAL.</p>	AOECS
4.4 Australia supports the proposed amendments to section 4.4 of the draft PAL guidelines.	Australia
4.4 Paraguay acuerda con la propuesta de redaccion	Paraguay
4.4 The United States notes the importance of broad-based education of all stakeholders when a PAL labelling guidance is implemented. The United States supports the proposed amended text in section 4.4 as it provides the needed clarity regarding who should lead the programs and which stakeholders must be included.	USA
4.4 New Zealand can support the text at 4.4	New Zealand
4.4 Canada supports Section 4.4	Canada

COMMENTS	MEMBER / OBSERVER
4.4 Egypt supports the new amended text	Egypt
PRESENTATION OF PAL	
The United States supports the amended text in section 5. As much as possible, there should be consistency in presentation between the declaration of allergenic foods as per section 8.1, 8.1.2, 8.1.3, and 8.2 of the General standard for the labelling of pre-package foods (CXS 1-1985) and labelling of a PAL statement. As such we support the text in 5.2 as the use of the term "shall" is consistent with the terminology use for declaration of allergenic foods. The United States supports the addition of 5.2bis as guidance was needed as to placement of a PAL statement when an ingredient statement is not on a food label. The proposed text offers the appropriate amount of guidance while providing needed flexibility as different packaging types and sizes need to be accommodated. The United States also supports the amended text in 5.2.1 as it provides more clarity regarding text which may be equivalent to "May contains". The United States recalls the discussion of the committee that other factual statements such as "made in a factory that also processes [allergenic food or cereal containing gluten]" are not PAL and, while they may be used in labelling, are not included in the scope of this guideline. The United States supports footnotes 4bis and 4ter as these footnotes provide additional clarity/guidance for PAL statements regarding cereals containing gluten. The United States supports the amended text in 5.2.2 which offers the needed guidance on presentation and it aligns with section 8.3.12 of the GSLPF (CXS 1-1985) for the declaration of allergenic foods.	USA
Egypt supports the updated text in section 5, in particular the proposed section 5.2bis, the proposed example to demonstrate "equivalent words" in section 5.2.1, and the proposed footnotes to address gluten declaration.	Egypt
5.2 The EUMS support this provision as proposed by the Chairs, noting that the text aligns with the corresponding provision in the GSLPF (paragraph 8.3.2.1).	European Union
5.2 Australia supports the proposed change to section 5.2, as it aligns the text to be consistent with the text in section 8.3 of the GSLPF.	Australia
5.2 Paraguay coincide con el ajuste	Paraguay
5.2 New Zealand can support the text at 5.2	New Zealand
5.2 Canada supports Section 5.2	Canada
5.2 With regard to PAL labelling methods, the Republic of Korea is of the view that, unlike mandatory allergen labelling, it would be appropriate to grant food business operators flexibility, under their own responsibility, in determining the location and format of PAL statements.	Republic of Korea
5.2 bis ICA Comments: ICA supports the addition of 5.2bis. We appreciate the language clarifying the location of PAL statements when both a contains statement and PAL are used in cases where packages are exempt from providing an ingredient declaration. This flexibility is particularly important for small confectionery items.	ICA
<p>5.2 bis ..., <u>the PAL declaration statement shall be placed directly under or in the same field of vision close proximity to as the separate...</u></p> <p>The EUMS support the principle of this provision and welcome the modifications proposed by the Chairs.</p> <p>However, this text could be more prescriptive regarding the location of the PAL statement in relation to the separate statement ("Contains"). Specifically, paragraph 8.3.2 of the GSLPF states that allergens must be declared in the list of ingredients, in a separate statement, or in both. The GSLPF further specifies in paragraph 8.3.2.1 that a separate statement must be placed directly under or in close proximity to the list of ingredients when present. Similarly, the PAL statement should also appear directly under or in close proximity to the separate statement, i.e. the allergen declaration (whether in the list of ingredients, the separate statement, or both).</p>	European Union

COMMENTS	MEMBER / OBSERVER
<p>The EUMS are furthermore of the opinion that, in alignment with paragraph 5.2 above, PAL should be considered a statement, and not a declaration.</p> <p>Against this background, to ensure consistency with other paragraphs in this guideline and the GSLPF, the EUMS propose the following amendments:</p>	
<p>Australia can support section 5.2bis as proposed by the EWG Chairs.</p> <p>However, Australia suggests for the second sentence that 'shall' could be replaced with 'should'. Australia is supportive of allergen information being placed together wherever possible, however notes that practical constraints may limit the ability for such statements to always be co-located.</p>	Australia
5.2 bis Paraguay de acuerdo	Paraguay
<p>5.2 bis ...<u>PAL declaration shall be appear directly under or in close proximity to the same field of vision as the separate statement.</u></p> <p>Canada supports Section 5.2bis but suggests that the words "in the same field of vision" be replaced with the words "directly under or in close proximity to", for consistency with other parts of the text. This would ensure that all allergen/gluten related information is grouped closely together for consumers.</p>	Canada
<p>5.2 bis FoodDrinkEurope supports the objective of improving clarity, consistency and consumer understanding in PAL statements.</p> <p>FoodDrinkEurope notes that introducing multiple or flexible wording options, or examples that could be interpreted as encouraging parallel or repeated PAL statements, may undermine harmonisation and create confusion.</p> <p>Section 5.2.1 should therefore be refined to prioritise clarity and consistency in wording and to avoid unintended consequences that could lead to a proliferation of different PAL expressions.</p> <p>FoodDrinkEurope supports the objective of proposed Section 5.2bis to ensure that, for foods without an ingredient list, PAL statements are clearly visible and easily noticeable by consumers. However, to ensure consistent and harmonised implementation, FoodDrinkEurope recommends refining the drafting by anchoring the placement of PAL to a specific and universally present labelling element, such as the name of the food and/or the net quantity, rather than referring to "any of the other mandatory elements".</p> <p>Regarding the proposed footnotes addressing gluten declaration, FoodDrinkEurope considers that further clarification is needed to ensure that their application is clear, practical and aligned with the scientific basis of the reference dose. In particular, the current wording may create uncertainty as to how gluten and cereal sources should be declared and interpreted in PAL statements, and may lead to overly complex or potentially confusing labelling approaches that are not aligned with analytical feasibility or consumer understanding.</p> <p>In this context, particular attention should be given to ensuring that the application of PAL does not result in labelling that does not reflect the actual gluten risk, for example in the case of oats.</p>	FoodDrink Europe
5.2 bis New Zealand supports the text at 5.2bis.	New Zealand
<p>5.2 bis Egypt supports the proposed text in section 5.2bis. It clarifying how PAL should be presented when an ingredient list is not present, ensuring visibility and consistency with the general principles of food labelling established in the GSLPF (CXS 1-1985).</p> <p>Also, the requirement that PAL be declared in a prominent position and within the same field of vision as other mandatory labelling elements contributes to effective risk communication and consumer understanding.</p>	Egypt
5.2 bis ... <u>the label. Where a separate statement made in accordance with Section 8.3.2.1 of the GSLPF exists on the label, the PAL declaration shall be in the same field of vision as the separate statement.</u>	Thailand

COMMENTS	MEMBER / OBSERVER
Thailand proposes deleting the last sentence of Section 5.2bis. Referring to Section 8.3.2.1 of CXS 1-1985 is redundant and confusing, as those details are already covered in Sections 5.2 and 5.2.1. Furthermore, the first part of 5.2bis already provides sufficient guidance by stating that PAL must be in a prominent position when an ingredient list is absent.	
5.2 bis ICBA supports the proposed text as it provides clarity to FBOs on appropriate placement of the PAL statement in situations where an ingredient declaration statement is not present. It also aligns with the GSLPF	ICBA
5.2bis: For foods exempt from ingredient list declaration, it is recommended to emphasize that the PAL statement should remain directly associated with the name of the food or the principal display panel. This would ensure that the statement is clearly visible and readily noticeable to consumers, particularly in cases where no ingredient list is present.	United Arab Emirates
5.2 bis The UK supports the revised drafting in para 5.2.	United Kingdom
<p>5.2.1 Regarding paragraph 5.2.1, the EUMS have consistently supported the adoption of a single, clear, and standardised PAL statement to communicate the potential presence of allergens. Such harmonisation is essential to enhance protection for consumers with food allergies by ensuring clarity and enabling informed purchasing decisions. In this context, the EUMS consider that the only appropriate and recognised wording for PAL should be: "May contain".</p> <p>Against this background, the EUMS have reservations regarding the inclusion of the wording "(or equivalent words)" in the proposed text and recommend its deletion to preserve harmonisation. The inclusion of "or equivalent words" (even with the example) introduces unnecessary flexibility that could lead to variability in labelling practices and increase the risk of inconsistent consumer interpretation. The use of a single wording would ensure that all products carry the same clear warning, enabling allergic consumers to quickly and confidently identify foods that may pose a risk to them. This position is supported by scientific evidence, including the "International Social Science Liaison Group (ISSLG). Literature review on precautionary allergen labelling and risk communication for food allergens" and the "FAO/WHO Expert Consultation on Food Allergens. Part 3: Precautionary allergen labelling", which emphasises the importance of consistent PAL wording to ensure clarity and effective communication of unintended allergen risks.</p> <p>Finally, the EUMS can support footnotes 4bis and 4ter in their current form.</p>	European Union
<p>5.2.1 ...words 'May contain' (or equivalent words such as 'may be present') and include the...</p> <p>For reasons of clarity to consumers and uniformity AOECS suggests to only allow the words 'may contain'</p> <p>Footnote 3. <u>...the PAL statement. The reference dose (RfD) for cereals containing gluten is established for PAL and used to derive action levels for unintended allergen presence due to cross-contact. It does not replace the ≤20 mg/kg threshold for foods labelled gluten free as established in CXS 118-1979.</u></p> <p>The FAO/WHO expert consultation concluded that the RfD for gluten used in the PAL framework should not be used as the basis for defining gluten free labelling, and that there is no need to revise the existing ≤20 mg/kg threshold in CXS 118-1979. AOECS has experienced that the RfD and the gluten-free threshold are often confused. Therefore we suggest to add this text to the footnote with the aim to avoid this confusion.</p>	AOECS
<p>Annuler la suppression des mots "inclure le ou les " et "identifiée"</p> <p>Justificatif : pour plus de clarté du paragraphe</p> <p>Il est important d'avoir une formulation unique ou une liste fermée des termes à utiliser</p> <p>Justificatif : pour éviter toute confusion chez le consommateur</p>	Morocco
5.2.1 Australia supports the proposed amendments to section 5.2.1, as they maintain the intent of the previous wording while adding further clarity.	Australia

COMMENTS	MEMBER / OBSERVER
<p>Footnote 3 Australia supports footnote 4bis as proposed by the EWG Chairs, but does not support footnote 4ter as currently worded.</p> <p>It is most important to inform individuals with coeliac disease about the presence of gluten, rather than to inform these individuals of the presence of individual cereals. Previous consumer research conducted by Australia found that gluten-sensitive consumers, as well as those purchasing for them, appeared to rely on the inclusion of the word 'gluten' somewhere on the label. Note that 'gluten sensitive' in the context of this research refers to both non-Coeliac gluten sensitivity and Coeliac disease (Research available here: https://www.foodstandards.gov.au/sites/default/files/2024-01/P1044%20Report%20SD2%20-%20Consumer%20Literature%20Review.pdf)</p> <p>Australia notes that the allergen labelling requirements in the GSLPF were developed for declarations in either an ingredient list or an allergen summary statement, whereas PAL declarations relate to the unintended presence of an allergen/gluten in a food (rather than intentional inclusion in the food). Individual cereal names have relevance for ingredient names but are less useful for allergen statements and, noting the consumer research provided above, the word 'gluten' is more suited for quick identification purposes. National/regional authorities should therefore have the flexibility to require either 'gluten' or the individual cereal names 'barley' and 'rye' for PAL statements.</p> <p>Note that in the case of a wheat PAL declaration, we support requirements that mandate the specified name 'wheat' with the use of the word 'gluten' permitted only in addition (not instead of) to this specified name. Wheat should always be declared in a PAL statement as its risk relates to the presence of other wheat proteins separate to the presence of gluten.</p> <p>Australia therefore proposes a revised footnote 4ter as follows:</p> <p>Footnote 4ter: In addition to the specified name of wheat, the word 'gluten may be used. In addition to or instead of the specified names rye and barley, the word 'gluten' may be used.</p>	
<p>5.2.1 Paraguay de acuerdo con la propuesta</p> <p>Footnote 4 bis De acuerdo con la nota</p> <p>Footnote 4 ter Paraguay de acuerdo con la propuesta</p>	Paraguay
<p>5.2.1 Concerning "equivalent words," the Republic of Korea is of the view that the expression "made in a factory that" would also be appropriate for conveying the risk of unintended allergen cross-contact.</p>	Republic of Korea
<p>5.2.1 Canada questions whether additional clarity is required with regards to the term "equivalent words". In CX/FL 26/49/5 paragraph 46 notes that "The word "equivalent" was deliberately included to prevent the use of statements with different meanings to "may contain" such as "contains traces of" or "made in a factory that produces" ". What about the statements "made on shared equipment" or "not suitable for someone with an allergy to"? Canada believes that these statements would also be excluded since they are not "equivalent" but questions whether this requires further clarification. If the only statements that would be permitted are "may contain" and "may be present" Canada believes it may be preferable to say this explicitly.</p> <p>Footnote 4 bis Canada supports the addition of 4bis which address how cereals containing gluten should appear in PAL statements.</p> <p>Footnote 4 ter Canada supports the addition of 4ter which address how cereals containing gluten should appear in PAL statements.</p>	Canada
<p>5.2.1 ...present') and <u>be followed by a declaration of</u>include the identified declare the allergenic food(s)...</p> <p>We have proposed the amendment to ensure that the guidance is clear for FBOs. This amendment is to make sure that FBOs do not add the words "traces of" after the words "may contain".</p>	Norway
<p>5.2.1 New Zealand is supportive of providing the example 'such as may be present' in the text of 5.2.1. However regarding Footnote 4bis, we consider the requirement to list all gluten</p>	New Zealand

COMMENTS	MEMBER / OBSERVER
containing cereals when the source of gluten cannot be determined is onerous. In such situations it may be preferable to require declaration of the term "gluten".	
5.2.1 Thailand agrees to add examples of equivalent words to 'may contain' for clarity and to accommodate different translations of the term.	Thailand
<p>5.2.1 ...(or equivalent words <u>such as 'may be present'</u>) and include...</p> <p>ICBA notes that 'gluten' is not a specified name of 4.2.1.5 of GSLPF, so 'gluten' should not be used equivalently to 'wheat', 'rye', or 'barley' in the PAL statement, e.g. 'May contain wheat, barley and gluten' is not appropriate. When the word 'gluten' is used in addition to the specified name of wheat, rye and barley, the word 'gluten' shall be used in separate manner from 'wheat', 'rye' or 'barley'. Some example wording such as using 'may be present' would be helpful in this footnote.</p> <p>Footnote 4 ter <u>...the specified name of (i.e. wheat, rye, and barley,) the word 'gluten' may be used separately, e.g., 'May contain wheat and barley. Gluten may be present.'</u></p>	ICBA
5.2.1 Brazil considers that the proposed footnotes 4bis and 4ter in Section 5.2.1 should remain under consideration at this stage. In Brazil's view, final consideration of these footnotes would be premature while the full official reports of the two most recent FAO/WHO expert consultations that are directly relevant to the unresolved provisions of the draft are still not available. Brazil notes that these footnotes are closely linked to the unresolved issues in Sections 4.3.1 and 4.3.3.	Brazil
<p>5.2.1 The UK suggests providing additional flexibility by allowing the following alternative wording: "may not be suitable for.....".</p> <p>The UK supports this new footnote addressing gluten.</p>	United Kingdom
<p>5.2.1 Footnote 4bis To improve clarity and alignment in Section 5.2.1, ISDI recommends revising footnote 4bis as follows:</p> <p>"When unintended gluten is present above the action level and its source cannot be verified by risk assessment, the PAL statement must either list the specified names of all cereals containing gluten (i.e., wheat, barley, and rye) or simply mention 'gluten' without naming the specified cereals."</p> <p>This approach provides flexibility while maintaining clear communication for consumers. The term "gluten" is widely recognised, and allowing its use is beneficial in cases where packaging space is limited.</p>	ISDI
5.2.1 Footnote 5 The footnote to Table 4.3.1 usefully clarifies that the action level is derived by dividing the reference dose by the amount of food consumed on a single eating occasion, preferably using the 50th percentile. However, the draft does not specify the data source or methodological basis to be used for establishing that amount of food. To improve consistency in implementation and comparability across jurisdictions, it is proposed to clarify whether the amount consumed should be derived from national or regional food consumption data, and to provide further guidance on the selection of the relevant food category and consumption dataset. This is particularly important because consumption habits and portion sizes may differ between regions and populations, which may lead to different concentration-based action levels for similar foods. In the absence of such clarification, different competent authorities may derive different action levels for similar foods.	MoniQA
5.2.2 ICA Comments: ICA supports the amendments proposed in 5.2.2. We believe that this flexibility and use of the words "such as" is necessary to account for the national differences in allergen labeling and options for manufacturers for PAL information on packages.	ICA
<p>5.2.2 ...PAL statement shall <u>be declared appear in a clear...</u></p> <p>The EUMS support this provision as proposed by the Chairs, as the text is consistent with the corresponding provision in the GSLPF (paragraph 8.3.1). The EUMS would like to suggest replacing the word "declared" with the word "appear" for consistency reasons.</p>	European Union

COMMENTS	MEMBER / OBSERVER
5.2.2 Australia supports the proposed change to section 5.2.2, as it aligns the text to be consistent with the text in section 8.3 of the GSLPF.	Australia
5.2.2 Paraguay de acuerdo con el punto	Paraguay
<p>5.2.2 New Zealand supports consistency of text for 5.2.2. and 8.3.1. of the GSLPF.</p> <p>New Zealand also considers there could be benefit to consumer ease of use and understanding if where both PAL and allergen declarations are present in labelling, the method of contrast used should be consistent for both. We suggest the following text be added to the end of 5.2.2 to incorporate this:</p> <p>Where both a PAL statement and an allergen declaration are present these shall be declared using the same clear and distinct manner.</p>	New Zealand
5.2.2 Egypt supports the new amended text.	Egypt