



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION**

**Eighty-seventh Session**  
**FAO Headquarters, Rome, Italy**  
**18 – 22 November 2024**

**CRITICAL REVIEW - PART III<sup>1</sup>**

**Note:** For general information about the critical review and the critical review for CCPR55 and CCLAC23, please see CX/EXEC 24/87/2. For the critical review for CCFICS, CCNFSDU and CCFFP, please see CX/EXEC 24/87/2 Add.1.

**1. Structure of appendices**

The work of the different committees is addressed in separate appendices. The structure of the appendices for each committee is as follows:

1. General information on the committee and session
2. Overall comments (Secretariat/Chairperson)
3. Status of work items (Overview)
4. Specific comments on individual work items (Secretariat/Chairperson)

**2. List of appendices**

Appendix 1: Codex Committee on Residues of Veterinary Drugs in Foods, 27th Session (CCRVDF27)

Appendix 2: Codex Committee on Food Labelling, 48th Session (CCFL48)

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<sup>1</sup> This document addresses CCRVDF27 and CCFL48

## Appendix 1

## 1. General

<b>Committee</b>	<b>Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)</b>		
<b>Host</b>	United States of America	<b>Chairperson</b>	Brandi Robinson
<b>Session reported on</b>	CCRVDF27	21-25 October 2024	
<b>Next Session</b>	CCRVDF28	23-27 March 2026	
<b>Report</b>	<u>REP24/RVDF27</u>		

## 2. Overall comments

**Secretariat's comments:**

CCRVDF27 was successfully conducted. A total of 46 Member countries, one Member organization, and five Observer organizations attended CCRVDF27. Three physical working group (PWG) meetings were held just before the start of CCRVDF27, and one in-session working group (ISWG) during the session. These working groups helped consider issues raised in comments in reply to relevant circular letters and conference room documents (CRDs), allowing for decision-making in the plenary.

All agenda items were discussed and consensually concluded. CCRVDF27 forwarded to CAC47 maximum residue limits (MRLs) for clopidol and imidacloprid for adoption at Step 5/8 and MRLs for fumagillin dicyclohexylamine (DCH) for adoption at Step 5 to allow JECFA to address comments expressed by Members at the session through the submission of concern forms or to allow more time to consider JECFA monographs that were not yet at or just available before the CCRVDF session.

The continued implementation and enhancement of the extrapolation procedure enabled MRLs for three compounds to be forwarded to Step 5/8 for final adoption. The procedure was revised to include new criteria to allow the extrapolation of MRLs in camelids. Work continues to find ways to extrapolate MRLs to edible offal tissues other than liver and kidney. The extrapolation procedure represents an innovative and robust risk management approach to allow for the establishment of MRLs for veterinary drugs in situations where there might not be sufficient data to do so through the regular procedure of evaluating compounds by JECFA yet ensuring the MRLs are safe and ensure fair practices in the food trade.

CCRVDF also demonstrated innovation and resilience in addressing criteria and procedures for establishing Action Levels for residues of veterinary drugs in food of animal origin resulting from unavoidable and unintentional veterinary drug carry-over in non-target animal feed and developing complementary guidelines to guide competent authorities in situations where Action Levels are not established or exceed the Codex value.

The priority list of veterinary drugs for evaluation by JECFA has been forwarded to CAC for approval as new work. It also contains proposals for new work on extrapolating MRLs and establishing Action Levels.

Coordination of work between CCRVDF and CCPR continues, and a virtual meeting of the Joint CCRVDF/CCPR Electronic Working Group (EWG) may possibly be held to aid in the resolution of matters related to the establishment of harmonized MRLs for dual-use compounds as veterinary drugs and pesticides.

**Chairperson's comments:**

The CCRVDF27 meeting was very productive, advancing work for MRLs, advancing additional work on extrapolation including extrapolated MRLs, and addressing veterinary drug residues in food of animal origin due to unintentional and unavoidable carryover in animal feed. While there are still limited compounds with data available for JECFA evaluation, CCRVDF27 saw an increase in the work planning for evaluation of veterinary drugs for MRLs with the addition of compounds to the Priority List with data availability dates beyond the next JECFA meeting which will allow for planning for future JECFA agendas.

One challenge noted was the timing of availability of the residue and toxicology monographs following the JECFA meeting. The residue monographs were made available to the Members approximately one week prior to the CCRVDF meeting, but the toxicology monographs are not yet available. This did present some challenges in discussing the proposed MRLs.

Some of the EWGs noted limited participation and some Members shared that challenges with the online forum were a factor in participation. The PWG meetings helped to overcome the lack of participation in the EWGs and CCRVDF27 saw progress on all agenda items.

CCRVDF27 endorsed a virtual meeting of the Joint CCPR/CCRVDF Working Group to help facilitate progress on the cross cutting work between the two committees.

**3. Status of work items**

<b>Topic</b>	<b>Recommendation of the Committee</b>
<b>For decision by the Commission</b>	
1. MRLs for clopidol (chicken – kidney, liver, muscle and skin/fat)	Adoption at Step 5/8
2. MRL for imidacloprid (finfish – fillet (muscle with skin in natural proportions) and/or muscle)	Adoption at Step 5/8
3. Extrapolation of MRLs for veterinary drugs to one or more species <ul style="list-style-type: none"> <li>• Lufenuron (finfish - fillet)</li> <li>• Emamectin benzoate (finfish – muscle and fillet)</li> <li>• Ivermectin (all other ruminants – milk)</li> </ul>	Adoption at Step 5/8
4. MRLs for fumagillin dicyclohexylamine (DCH) (fish fillet and honey)	Adoption at Step 5
5. Editorial amendment to the <i>Code of practice on good animal feeding</i> (CXC 54-2004)	Adoption
6. Revisions to the Risk Analysis Principles applied by CCRVDF <p>6.1 Revisions to Annex C – <i>Approach for the extrapolation of MRLs for veterinary drugs to one or more species of the Risk Analysis Principles applied by CCRVDF in the Procedural Manual</i></p> <ul style="list-style-type: none"> <li>• Revised Criterion 2b</li> <li>• New set of criteria for the extrapolation of MRLs to camelids</li> <li>• Additional criterion for milk extrapolation</li> </ul> <p>6.2 Inclusion of Annex D - <i>Criteria and procedures for the establishment of Action Levels for residues of veterinary drugs in food of animal origin resulting from unavoidable and unintentional veterinary drug carry-over in non-target animal feed under the Risk Analysis Principles applied by CCRVDF in the Procedural Manual</i></p> <p>6.3 Consequential amendment to the section on the Establishment of the priority list (paragraph 133) of the <i>Risk Analysis Principles Applied by CCRVDF in the Procedural Manual</i></p>	Adoption
7. New work proposal to develop a Guideline for actions to be taken by competent authorities following the detection of a residue of a veterinary drug in a non-target animal commodity associated with unavoidable and unintentional carryover in feed	Approval
8. Priority List of veterinary drugs (Parts I, V and VI)	Approval
<b>For information</b>	
9. Extrapolation of MRLs for veterinary drugs to one or more species - further work on extrapolation to edible offal tissues other than liver and kidney	For consideration by CCRVDF28
10. CCPR/CCRVDF Collaboration	Ongoing

#### 4. Specific comments

<p><b>1. MRLs for clopidol (chicken – kidney, liver, muscle and skin/fat), Paragraph 52 (i), Appendix III (Part I)</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to forward the MRLs for clopidol (chicken - kidney, liver, muscle, and skin/fat) to CAC47 for adoption at Step 5/8. While there were initial concerns over the incomplete data package submitted to JECFA for the evaluation, it was noted that this did not hinder the progress of the MRLs as JECFA's evaluation approach in such a situation was pragmatic, well-documented, and applied high safety factors.</p> <p>Reservations were expressed on the advancement of the MRLs due to a lack of data and pending the outcome of its review of the JECFA monographs, published only recently before the plenary.</p> <p>These reservations do not hinder the advancement of the MRLs for final adoption. This reservation is raised here as it relates to procedural aspects related to the timely availability of JECFA documents to allow countries to consider the JECFA MRL recommendations and make informed comments for consideration by CCRVD27.</p>
<p><b>Chairperson's comments:</b></p> <p>The only concerns raised during the discussion of the MRLs for clopidol related to the timing and availability of the JECFA monographs. The residue monographs were made available one week before CCRVD27 and the toxicology monographs were not available yet. There was consensus to forward the MRLs for adoption at Step 5/8 with a few reservations due to the timing.</p> <p>Work has progressed in a timely manner as the evaluation of clopidol was approved as new work as part of the Priority List by CAC46 (2023).</p>
<p><b>2. MRL for imidacloprid (finfish fillet (muscle with skin in natural proportions) and/or muscle), Paragraph 52 (ii), Appendix III (Part I)</b></p>
<p><b>Status:</b></p> <p>CCRVD27 agreed to forward the MRL for imidacloprid (finfish fillet (muscle with skin in natural proportions) and/or muscle) to CAC47 for adoption at Step 5/8.</p>
<p><b>Chairperson's comments:</b></p> <p>There was clear consensus for forwarding the MRL for imidacloprid in finfish for adoption at Step 5/8. No concerns were expressed by Members.</p>
<p><b>3. Extrapolation of MRLs for veterinary drugs to one or more species (lufenuron (finfish – fillet, emamectin benzoate (finfish – muscle and fillet), and ivermectin (all other ruminants – milk)), Paragraphs 59 (i, iii) and 76 (iii), Appendix IV</b></p>
<p><b>Status:</b></p> <p><u>Lufenuron</u></p> <p>CCRVD27 agreed to forward the extrapolated MRLs for lufenuron to finfish to CAC47 for adoption at Step 5/8 as it complied with the criteria in the existing extrapolation procedure.</p> <p><u>Emamectin benzoate</u></p> <p>CCRVD27 agreed to forward the extrapolated MRLs for emamectin benzoate to finfish - muscle and fillet - to CAC47 for adoption at Step 5/8 based on the revised Criterion 2b (see Item 6.1) to allow a homolog to clarify that in cases where the active substance is a combination of homologous compounds, the marker residue can be considered the same as the parent if it is a homolog that is a major component of the active substance.</p> <p><u>Ivermectin</u></p> <p>CCRVD27 agreed to forward the extrapolated MRL for ivermectin to milk for all other ruminants to CAC47 for adoption at Step 5/8 based on adding a new criterion to allow milk extrapolation (see Item 6.1).</p>

<p><b>Chairperson's comments:</b></p> <p>CCRVD27 reached consensus on advancing the extrapolated MRLs for lufenuron. CCRVD27 was also supportive of modifications to the extrapolation criteria to add clarification on how to consider active substances, which are a combination of homologous compounds. With the clarification added to the extrapolation criteria, there was consensus to advance the extrapolated MRLs for emamectin benzoate to finfish.</p> <p>CCRVD27 agreed to modify the extrapolation criteria for milk and reached consensus to extrapolate the MRL for ivermectin to milk of all other ruminants and advance it to Step 5/8. There were a few reservations on the extrapolated MRL for ivermectin to milk of all other ruminants due to concerns that challenges with noncompliance could lead to trade issues.</p>
<p><b>4. MRLs for fumagillin dicyclohexylamine (DCH) (fish fillet and honey), Paragraph 53, Appendix III (Part II)</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to forward the MRLs for fumagillin DCH (fish fillet and honey) to CAC47 for adoption at Step 5.</p> <p>Adoption at Step 5 will allow Members to consider these MRLs further based on the full availability of JECFA reports/monographs or to submit concerns to the JECFA Secretariat on different aspects of the JECFA's evaluation for further consideration by JECFA (as appropriate) to enable finalization of the MRLs at CCRVD28.</p>
<p><b>Chairperson's comments:</b></p> <p>At CCRVD27, some Members expressed concerns with the recommended MRLs and committed to submit concern forms within one month of the end of the plenary session. The committee forwarded the MRLs for adoption at Step 5 to allow for additional time to consider the MRLs and for JECFA to review the concern forms.</p>
<p><b>5. Editorial amendment to the Code of practice on good animal feeding (CXC 54-2004), Paragraph 12, Appendix II</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to forward for approval by CAC47 the update of footnote 9 of the <i>Code of Practice on Good Animal Feeding</i> (CXC 54-2004) to refer to the <i>Guidelines for the Design and Implementation of National Regulatory Food Safety Assurance Programmes Associated with the Use of Veterinary Drugs in Food-Producing Animals</i> (CXG 71-2009).</p> <p>CCRVD28 noted that footnote 9 currently references the <i>Code of Practice for Control of the Use of Veterinary Drugs</i> (CAC/RCP 38-1993), which has been superseded by CXG 71-2009. This was considered an editorial amendment with no impact on the technical content of the Code of Practice.</p>
<p><b>Chairperson's comments:</b></p> <p>CCRVD27 expressed no concerns with the editorial amendment.</p>
<p><b>6. Revisions to the Risk Analysis Principles applied by CCRVDF</b></p>
<p><b>6.1 Revisions to Annex C – Approach for the extrapolation of MRLs for veterinary drugs to one or more species of the Risk Analysis Principles applied by CCRVDF in the Procedural Manual, Paragraphs 59 (ii), 62, 76 (iii), and 91 (i), Appendix V (Part II)</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to revise Annex C to revise Criterion 2b to allow homologs to be considered the same as the parent compound when they are used as marker residue and are the major components of an active substance, which is a combination of homologous compounds, to include a new criterion to allow milk extrapolation and to add new criteria for extrapolation of MRLs to camelids.</p> <p>The amendment to Criterion 2b and the additional criterion for milk extrapolation allows MRLs for emamectin benzoate and ivermectin to be extrapolated to all finfish and the milk of all other ruminants (see Item 3). Including new criteria to extrapolate MRLs to camelids will allow MRLs to be extrapolated to different tissues/milk of camelids.</p>

<p><b>Chairperson's comments:</b></p> <p>CCRVD27 reached consensus on modifications to the extrapolation criteria to add clarification and to provide greater flexibility.</p>
<p><b>6.2 Inclusion of Annex D - <i>Criteria and procedures for the establishment of Action Levels for residues of veterinary drugs in food of animal origin resulting from unavoidable and unintentional veterinary drug carry-over in non-target animal feed under the Risk Analysis Principles applied by CCRVDF in the Procedural Manual, Paragraph 110, Appendix V (Part III)</i></b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to <i>Criteria and procedures for the establishment of Action Levels for residues of veterinary drugs in food of animal origin resulting from unavoidable and unintentional veterinary drug carry-over in non-target animal feed</i> and to include as a new Annex D in the <i>Risk Analysis Principles applied by CCRVDF</i>.</p> <p>CCRVD27 agreed to establish Action Levels for lasalocid and nicarbazin in eggs subject to the adoption of Annex D and approval of new work of the priority list by CAC47 (see Item 8). The Annex also defines Action Levels to differentiate them from MRLs for veterinary drugs and to describe the context under which they are applied.</p>
<p><b>Chairperson's comments:</b></p> <p>CCRVD27 discussed the work related to residues of veterinary drugs in food of animal origin due to unintentional and unavoidable carryover in animal feed in a PWG prior to the beginning of plenary and during an ISWG. These discussions helped CCRVD27 to reach consensus on a two-fold approach to provide risk management advice. The first part of the approach was to finalize the work on Action Levels which included modification of the definition and agreement on the approach for determining Action Levels. CCRVD27 agreed to include this approach in the <i>Risk Analysis Principles Applied by CCRVDF</i> as a new Annex. CCRVD27 agreed to a new work proposal as the second part of the approach for risk management advice. This will be considered under new work.</p> <p>With completion of the approach for determining Action Levels, CCRVD27 also added lasalocid and nicarbazin to the Priority List for consideration for Action Levels.</p>
<p><b>6.3 Consequential amendment to the section on Establishment of priority list (paragraph 133) of the <i>Risk Analysis Principles Applied by CCRVDF in the Procedural Manual, Paragraph 112, Appendix V (Part I)</i></b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to revise the section on the establishment of the priority list to reflect new practices related to the establishment of extrapolated MRLs (Annex C) and Action Levels (Annex D) in addition to the establishment of MRLs based on JECFA evaluations (see Items 6.1 and 6.2).</p>
<p><b>Chairperson's comments:</b></p> <p>During the discussion, it was noted that the <i>Risk Analysis Principles Applied by CCRVDF</i> did not reference extrapolated MRLs and should be modified to include the newly agreed approach for Action Levels. The CCRVD27 reached agreement on language which would incorporate both risk management approaches.</p>
<p><b>7. New work proposal to develop a Guideline for actions to be taken by competent authorities following the detection of a residue of a veterinary drug in a non-target animal commodity associated with unavoidable and unintentional carryover in feed, Paragraph 111, Appendix VI</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVD27 agreed to request approval of new work to develop guidelines for actions to be taken by competent authorities following the detection of a residue of a veterinary drug in a non-target animal commodity associated with unavoidable and unintentional carryover in feed.</p> <p>This work complements the criteria and procedures for CCRVD27's establishment of Action Levels, as described in Annex D (see Item 6.2). The guideline will provide competent authorities with guidance on actions that may be taken when residues of veterinary drugs in food in a non-target animal commodity associated with unavoidable and unintentional carryover in feed are below or above the established Action Levels or when no Action Levels are established.</p>

<p><b>Chairperson's comments:</b></p> <p>As part of the discussion on addressing veterinary drug residues in food of animal origin due to unintentional and unavoidable carryover in feed, CCRVDF27 agreed to forward for approval a new work proposal to develop a guideline for competent authorities. This guideline will provide additional information on how to use Action Levels.</p>
<p><b>8. Priority List of veterinary drugs (Parts I, V and VI), Paragraphs 113, 114(i, ii) and 140 (i), Appendix VII</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVDF27 agreed to forward the priority list of veterinary drugs to CAC47 for approval as new work, which includes:</p> <ul style="list-style-type: none"> <li>• <u>Part I - Compounds for evaluation by JECFA</u>: Amoxicillin, bromoform (environmental inhibitor) ethion, fumagillin dicyclohexylamine (DCH), and umifoxolaner.</li> <li>• <u>Part V - Compounds for MRL extrapolation</u>: Albendazole, ivermectin, and oxytetracycline</li> <li>• <u>Part VI - Compounds for establishing Action Levels</u>: Lasalocid and nicarbazin.</li> </ul> <p>CCRVDF27 identified no veterinary drugs for which data availability should be confirmed at CCRVDF28 (Part II) nor veterinary drugs for which additional data/information is necessary to complete the JECFA evaluation (Part III). Two compounds, bromoform and umifoxolaner, have been requested for evaluation by JECFA under the parallel review (Part IV) but are listed under Part I to facilitate identifying compounds requiring JECFA's evaluation.</p> <p>CCRVDF25 (2021) noted that (i) the definition of veterinary drugs did not exclude those used solely for environmental purposes and (ii) the future evaluation of such veterinary drugs was consistent with Goal 1 of the Codex 2020-25 Strategic Plan as more countries tried to address the impact of animals on climate change (REP21/RVDF25, paragraph 151). On this basis, bromoform is presented as a veterinary drug for evaluation by JECFA under the parallel review for new work for CCRVDF.</p>
<p><b>Chairperson's comments:</b></p> <p>CCRVDF27 reached consensus on the compounds for inclusion in the priority list. Many of the compounds were discussed during the PWG meeting prior to plenary, but others were added during plenary discussions. All recommendations from the PWG meeting were agreed to by CCRVDF27. The addition of albendazole, ivermectin and oxytetracycline for consideration for extrapolation to camelid tissues and milk and the additions of lasalocid and nicarbazin for consideration for Action Levels were added during plenary discussion. The nomination of bromoform to the priority list was also considered during plenary. Some concerns were expressed for the late nomination of bromoform, but CCRVDF27 agreed to include it on the priority list as the criteria for inclusion had been met and there was a commitment to provide a dossier with a date by which data would be available.</p>
<p><b>9. Extrapolation of MRLs for veterinary drugs to one or more species - further work on extrapolation to edible offal tissues other than liver and kidney, Paragraphs 90 (i) (a-c) and 90 (ii)</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCRVDF27 continues to investigate the possibility of extrapolating MRLs to edible offal tissues other than the liver and kidney.</p> <p>This is part of a comprehensive work on MRL extrapolation and the continued enhancement of the Criteria and Procedure for the Extrapolation of MRLs to one or more species (Annex C of the <i>Risk Analysis Principles applied by CCRVDF</i>).</p>
<p><b>Chairperson's comments:</b></p> <p>CCRVDF27 continues to support discussion on extrapolation to edible offal tissues other than liver and kidney. The work has been ongoing for some time. CCRVDF27 discussed questions developed by the EWG to provide further guidance on what should be considered in an extrapolation approach and affirmed their commitment to continue discussion on possible approaches.</p>

**10. CCPR/CCRVDF Collaboration, Paragraph 124 (ii)****Status and Secretariat's comments:**

CCRVDF27 continued to support coordination of work between CCRVDF and CCPR on issues of common interest to both committees, in particular, the establishment of harmonized/single MRLs for dual-use compounds to facilitate their application by Codex Members, through the work of the Joint CCPR/CCRVDF EWG.

CCRVDF27 endorsed scheduling a virtual meeting of the Joint EWG to improve participation; encouraged delegations to liaise with their CCPR counterparts to coordinate positions and actively participate in the work of the Joint EWG and its virtual meeting; and endorsed a possible virtual Joint Session of CCPR and CCRVDF to facilitate the consideration of the recommendations arising from the virtual meeting of the Joint EWG.

The virtual meeting of the Joint EWG could help facilitate discussions and consensus-based recommendations since the simultaneous participation of animal and plant health officers had not been fully achieved through regular work on the online platform.

**Chairperson's comments:**

CCRVDF27 supported the Joint CCPR/CCRVDF EWG recommendation to hold a virtual meeting of the EWG. This is one of the working groups which has seen limited participation in the online forum. A virtual meeting of the Joint EWG would allow participation from both CCPR and CCRVDF delegations in a single forum which would provide for greater interactions and discussion. CCRVDF27 also endorsed the recommendation for a possible Joint Session of CCPR and CCRVDF so that recommendations from the Joint EWG could be considered and agreed to by both committees together.

## Appendix 2

## 1. General

Committee	Codex Committee on Food Labelling (CCFL)		
Host	Canada	Chairperson	Dr. Parthi Muthukumarasamy
Session reported on	CCFL48	27 October - 1 November 2024	
Next Session	CCFL49	9-16 May 2026	
Report	<u>REP24/FL</u>		

## 2. Overall comments

**Secretariat's comments:**

CCFL48 was successfully convened as a 6-day session and attended by 44 Members and 26 Observer Organizations. Two virtual working group (VWG) meetings were held prior to the session supporting progress on the work on food allergen labelling and on guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce.

CCFL48 agreed to forward three items to CAC47 for adoption at Step 8; the revision to the *General standard for the labelling of pre-packaged foods* (CXS 1-1985): Provisions relevant to allergen labelling; guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce; and guidelines on the use of technology to provide food information in food labelling.

CCFL48 also agreed to forward the annex to CXS 1-1985: guidelines on the use of precautionary allergen labelling (PAL) to CAC47 for adoption at Step 5.

The work on allergen labelling benefitted from Joint FAO/WHO scientific advice which entailed 5 different scientific advice reports. To further assist with the ongoing work on PAL, further scientific advice is being requested from FAO/WHO and also a request to assist countries to implement risk assessment especially for small food business operators. Thus, the work of FAO and WHO (scientific advice and other) is not only integral to the development of the provisions on allergen labelling and guidelines on PAL, but also on the future implementation of the Guidelines. This FAO/WHO will also benefit the Codex Committee on Food Hygiene (CCFH) who will have to provide additional guidance to complement the work of CCFL in the *Code of practice on food allergen management for food business operators* (CXC 80-2020).

The work on e-commerce and use of technology demonstrates CCFL's forward thinking and ensuring that guidance is provided to countries embracing new ways of commerce and provision of information to consumers.

CCFL48 also considered for endorsement several labelling provisions in commodity standards submitted by other committees, which forms part of CCFL's core work.

CCFL48 considered six proposals for new work. After careful consideration and extensive discussions, CCFL48 agreed to forward one proposal to CAC47 for approval; on application of food labelling provisions in emergencies.

In response to a request from CCEXEC70 (2015), CCFL48 has also finalised the approach and criteria for evaluation and prioritization of the work of CCFL which will be published on Codex website as an information document for use by CCFL if and when needed. CCFL currently has a manageable agenda.

**Chairperson's comments:**

CCFL made significant achievements this session, forwarding three agenda items to CAC for adoption at Step 8 and one agenda item for adoption at Step 5. I would like to acknowledge the work over the past few years to lead us all to this point and the willingness of the delegates at CCFL48 to work through in-session groups throughout the week to find compromise.

For CCFL48, we dedicated four full days for plenary, allowing the committee time to discuss all the items in the step process and the possible new work items. In addition, the VWGs on food allergens, precautionary allergen labelling, and e-commerce were instrumental in advancing those items. In several instances, working documents were updated based on the circular letter comments, just prior to the session. In all cases, this helped facilitate the discussion.

**3. Status of work items**

<b>Topic</b>	<b>Job number</b>	<b>Target year</b>	<b>Recommendation of the Committee</b>
<b>For decision by the Commission</b>			
1. Revision to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Provisions relevant to allergen labelling	N10-2019	2024	Adoption at Step 8
2. Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce	N09-2019	2024	Adoption at Step 8
3. Guidelines on the use of technology to provide food information in food labelling	N07-2021	2026	Adoption at Step 8
4. Annex to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Guidelines on the use of precautionary allergen labelling	N10-2019	2024	Adoption at Step 5
5. New work proposal on application of food labelling provisions in emergencies	-	-	Approval
6. Non consensus on section 8.3.2 of the Standard for dried floral parts – dried saffron	-	-	For consideration
<b>For monitoring</b>			
7. Amendments to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Provisions relevant to joint presentation and multipack formats	N06-2023		Return to Step 2/3
<b>For information</b>			
8. Future new work proposals	For consideration at future CCFL		

#### 4. Specific comments

<p><b>1. Revision to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Provisions relevant to allergen labelling, Paragraph 52 (i), Appendix II</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCFL48 agreed to forward the revision to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Provisions relevant to allergen labelling to CAC47 for adoption at Step 8. The work directly benefitted from FAO/WHO scientific advice and took into account a literature review by the International Social Science Liaison Group. The format and presentation as well as language is according to Codex style.</p> <p>As requested by CAC42, to ensure that there is coherence between the work of CCFL and the CXC 80-2020 developed by CCFH, CCFL continues to update CCFH of progress. With the completion of work on the revisions to CXS 1-1985, immediate updates are required to CXC 80-2020 in relation to definitions and the list of foods and ingredients known to trigger food allergy or coeliac disease to be declared on a label.</p>
<p><b>Chairperson's comments:</b></p> <p>The virtual meeting of the Working Group on Food Allergen Labelling just prior to CCFL48 was pivotal in achieving consensus on the definitions, key provisions outstanding from the work of the EWG and in highlighting key areas for plenary discussion. Through discussion in plenary, consensus was reached on provisions. This work is linked to pending work of CCFH to revise the <i>Code of Practice on Food Allergen Management for Food Business Operators</i> (CXC 80-2020).</p> <p>With the finalization of this work within the proposed timeframe, there was consensus to send the revision of CXS 1-1985 for final adoption at Step 8.</p>
<p><b>2. Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce, Paragraph 104, Appendix IV</b></p>
<p><b>Status:</b></p> <p>CCFL48 agreed to forward the guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce to CAC47 for adoption at Step 8.</p> <p>The format and presentation as well as language is according to Codex style.</p>
<p><b>Chairperson's comments:</b></p> <p>The work on e-commerce progressed well and benefitted from two rounds of inter-sessional work in the EWG between sessions and VWG in advance of CCFL48. There was good consensus and will from CCFL48 to advance the work.</p>
<p><b>3. Guidelines on the use of technology to provide food information in food labelling, Paragraph 144, Appendix V</b></p>
<p><b>Status:</b></p> <p>CCFL48 agreed to forward the guidelines on the use of technology to provide food information in food labelling to CAC47 for adoption at Step 8.</p> <p>The format and presentation as well as language is according to Codex style.</p>
<p><b>Chairperson's comments:</b></p> <p>The work on use of technology benefitted from two rounds of inter-sessional work in the EWG between sessions. The work has some linkages with the e-commerce work, and it has worked well that the two items have progressed in parallel in the step process, resulting in alignment of relevant provisions.</p>
<p><b>4. Annex to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Guidelines on the use of precautionary allergen labelling, Paragraphs 92 (i), (vii), (viii), Appendix III</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCFL48 agreed to forward the annex to the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985): Guidelines on the use of precautionary allergen labelling to CAC47 for adoption at Step 5.</p> <p>CCFL48 also agreed to request CCEXEC87 to extend the deadline for completion of the work to 2026. Since the work on the annex was not separated from the revision to CXS 1-1985: provisions relevant to allergen labelling at first, the deadline was originally set for CCFL48 together with the revision.</p>

<p>This work has greatly benefitted from scientific advice provided by FAO/WHO and further requests have been made to FAO/WHO for scientific advice, which will help to finalise the work on the precautionary allergen labelling.</p> <p>CCFH will be informed of progress and the request to FAO/WHO for scientific advice, which will be of relevance also to CCFH for the future update of CXC 80-2020. CCFH will have to consider in future providing guidance on unintended allergen presence risk assessment in CXC 80-2020.</p>
<p><b>Chairperson's comments:</b></p> <p>Progress on the guidelines on the use of precautionary allergen labelling was impacted by the release of the Part 3 report the Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens, which was only published in June 2023 and the pending completion of advice from the Codex Committee on Methods of Analysis and Sampling (CCMAS) on suitable methods of analysis. This work is linked to CCFH. The main area of divergence is on the principle of when precautionary allergen labelling should be applied. The Guidelines on the Use of Precautionary Allergen Labelling is progressing to Step 5. A request to CCEXEC will be made to extend the deadline for completion of the work to 2026.</p>
<p><b>5. New work proposal on application of food labelling provisions in emergencies, Paragraphs 180 (i)-(iv), Appendix VI</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CCFL48 agreed to start working on application of food labelling provisions in emergencies and forward the project document to CAC47 for approval as new work.</p> <p>This work aims to provide high-level guidance to facilitate governments' consideration of food labelling measures in emergencies while ensuring the safety of the food supply and fair practices in the food trade.</p>
<p><b>Chairperson's comments:</b></p> <p>There was general support for the new work proposal following thorough discussion and revision of the the purpose, scope and main aspects of the new work. It was noted that reference to relevant Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) text should be considered. CCFICS will be informed of the new work proposal.</p>
<p><b>6. Non consensus on section 8.3.2 of the Standard for dried floral parts – dried saffron, Paragraph 36</b></p>
<p><b>Status and Secretariat's comments:</b></p> <p>CAC45 adopted the Standard for dried floral parts – dried saffron pending endorsement of the labelling provisions by CCFL.</p> <p>CCFL45 endorsed the labelling provisions for several standards submitted by the Codex Committee on Spices and Culinary Herbs (CCSCH) (sections 8.1, 8.2, 8.4), but had concerns on the labelling provisions 8.3 ("Country of Origin/Country of Harvest") and 8.5 (Inspection mark (optional)) and requested clarification from CCSCH.</p> <p>CCSCH5 informed CCFL46 that 8.5 (inspection mark) could be expunged from SCH standards and that country of origina/country of harvest could be split into into two independent and clear provisions, i.e. a provision on "Country of Origin" being mandatory and a provision on "Country of Harvest" being optional; and that these provisions would be reconsidered in individual standards, should the need arise.</p> <p>CCFL47 considered the provisions for "Country of origin" (8.3.1) and "country of harvest" (8.3.2) to be declared mandatory. CCFL47 endorsed all the labelling provisions in the Standard for Dried Floral Parts – dried saffron except the country of origin (8.3.1) and the country of harvest (8.3.2); and referred the two provisions to CCSCH for reconsideration, and to request CCSCH to clarify the distinction between country of origin and country of harvest; provide the rationale why the provision for the country harvest should be mandatory and how such a declaration would be beneficial for fraud prevention.</p> <p>Following feedback from CCSCH7, CCFL48 had discussion on the endorsement of section 8.3.1 and 8.3.2 (Country of harvest shall be declared.) of the Standard for dried floral parts – dried saffron.</p> <p>CCFL48 unanimously agreed on 8.3.1 (country of origin to be declared) as this was in line with the <i>General standard for the labelling of pre-packaged foods</i> (CXS 1-1985).</p> <p>CCFL48 could not reach consensus on section 8.3.2 (country of harvest to be declared) and decided to refer this issue to CCEXEC87 and CAC47. As a compromise, a proposal was made for the provision for country of harvest to be voluntary (optional), in line with earlier decisions for other herbs and spices</p>

standards. However, this was not accepted by delegations supporting the provision as mandatory and these delegates insisted on further consideration of this issue by CCEXEC and CAC.

It should be noted according to section 2: Elaboration of Codex standards and related texts: Format for Codex commodity standards: Labelling: the section should include all labelling provisions contained in the standard. Provisions should be included by reference to CXS 1-1985. The Section may also contain provisions which are exemptions from, additions to, or which are necessary for the interpretation of the general standard in respect of the product concerned provided that these can be justified fully.

CAC should decide if the Codex secretariat can publish the Standard (already adopted pending endorsement) with the labelling provisions endorsed by CCFL and provide guidance on how to deal with the issue of “country of harvest” (as a mandatory provision). The issue of “country of harvest” will continue to be an issue especially for high value spices as is evident on discussions on other standards in CCSCH.

**Chairperson’s comments:**

CCFL48 unanimously supported endorsement of 8.3.1 however there were divergent views on 8.3.2 (country of harvest). CCFL48 considered the feedback from CCSCH7, in response to clarifications requested during discussions on this issue at CCFL47. The committee focussed discussions on whether the response from CCSCH7 satisfied the request for clarification and whether the provision was ready for endorsement. After a round of general comments divergent views remained, and there was not consensus to endorse the provision for mandatory declaration of country of harvest.

To find a path forward, three options were proposed and considered by the committee, however agreement could not be reached on any of the options. As such, CCFL48 was unable to endorse the provision.

Looking back, CCFL45 did not endorse the labelling provisions related to country of origin at Step 5, and clarification was requested at that time for the saffron standard. Although CCFL46 endorsed labelling provisions in standards from CCSCH, the saffron standard was not among these, since there was continued debate on the issue of country of harvest within that committee. As such, the provisions considered by CCFL47 for endorsement were new and had not been seen in any CCSCH standards before. As required by the Procedural Manual, “deviations” from Codex general labelling standards require thoughtful consideration by CCFL. The discussion at CCFL48 demonstrates that this is a complex labelling issue with many elements for consideration.

It could be helpful for CAC to encourage delegates to consult with other national experts when considering draft standards, and it would also be useful for the CAC to remind commodity committees of the requirements for robust justification for “deviations” from general standards.

**7. Amendments to the *General standard for the labelling of pre-packaged foods (CXS 1-1985)*: Provisions relevant to joint presentation and multipack formats, Paragraph 155**

**Status and Secretariat’s comments:**

CCFL48 agreed to return the amendments to the *General standard for the labelling of pre-packaged foods (CXS 1-1985)*: Provisions relevant to joint presentation and multipack formats to Step 2/3 for further reconsideration by the EWG as there was mixed support for different options on Section 2: Definition of terms in the CXS 1-1985 and CCFL48 could not reach consensus on the texts.

The EWG has been re-established to carry out further work on the definitions, which address the best approach for the provisions relevant to joint presentation and multipack formats.

The work is on track as the CCFL aim for the final adoption by the CAC scheduled for 2028.

**Chairperson’s comments:**

Although this item did not advance in the step process, CCFL48 held a good discussion on the different options for defining the terms for the two formats, allowing the EWG to progress the work between sessions. The work is expected to remain on track.

**8. Future new work proposals, Paragraphs 169, 183, 194, 210, 222 and 223****Status and Secretariat's comments:**

CCFL48 considered following six new work proposals in addition to the new work proposal on application of food labelling provisions in emergencies.

- Labelling of alcoholic beverages
- Trans fatty acids (TFAs)
- Sustainability labelling claims
- Sugar labelling - definition for 'added sugars'
- Revision to the *Guidelines for the use of nutrition and health claims* (CXG 23-1997) to include "high-in" claims
- Uniform definition for "small packs"

However, CCFL48 did not agree that they were ready for being forwarded to CAC as new work at this stage and would be kept in CCFL's inventory table for future work.

**Chairperson's comments:**

Five of the six new work proposals were thoroughly discussed by CCFL48. No discussion paper was prepared on TFAs as CCFL48 agreed to wait until the Codex Committee on Fats and Oils (CCFO) completed its work on TFAs first. Consensus could not be reached despite attempts to refine the purpose and scope of the new work proposals for sustainability labelling claims and sugar labelling. Despite the extensive background work prepared by the WHO on the discussion paper on alcoholic beverages labelling, no Member offered to the lead on potential new work in this area.