

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 5, 8

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD LABELLING

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#### COMMENTS FROM THE INTERNATIONAL UNION OF FOOD SCIENCE TECHNOLOGY (IUFOST)

The objective of this conference room document (CRD) is to offer comments on behalf of the International Union for Food Science and Technology (IUFOST) an observer organization of the Codex Alimentarius Commission on two agenda items tabled at the 49<sup>th</sup> Session of the Codex Committee on Food Labelling (CCFL48).

The International Union of Food Science and Technology (IUFOST) is a global food science body that aims to harness and strengthen scientific understanding and expertise for the global good. IUFOST represents more than 300,000 scientists from national academies of science, industry, regulatory agencies including various science and academy organizations, in over 100 countries.

#### **Agenda item 5: Annex to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Guidelines on the use of precautionary allergen labelling (PAL) (Step 7)**

The International Union of Food Science and Technology (IUFOST) would like to thank the Chair of the Electronic Working Group (USA), the co-Chairs (Australia and the United Kingdom, and all delegations that contributed to the development of this text. IUFOST would also like to express its appreciation to the organizers and participants of the Physical Working Group convened on Sunday, 10 May, 2026 to which IUFOST was privileged to contribute.

At this advanced stage of the work, IUFOST considers that the development and adoption of these Guidelines represent a critical step toward strengthening the protection of food-allergic consumers and restoring the effectiveness and credibility of Precautionary Allergen Labelling (PAL) as a risk-management tool.

IUFOST's comments are primarily focused **on Section 4 concerning the "Principles"**. IUFOST appreciates that the current drafting appropriately emphasizes that PAL should not be used arbitrarily, should not substitute for Good Manufacturing Practices, and should be supported by an appropriate risk assessment establishing the need for PAL. IUFOST considers that these important concepts are now effectively reflected in Sections 4.1, 4.2, and 4.3.

However, IUFOST notes that the current formulation of the Principles **does not yet fully reflect another essential principle** associated with allergen labelling as a risk-management measure for food-allergic consumers. Specifically, **where a qualitative or quantitative risk assessment determines that unintended allergen presence presents a risk to allergic consumers**, there should be a corresponding obligation to communicate that risk through the use of Precautionary Allergen Labelling.

At present, the Principles focus primarily on limiting the misuse or overuse of PAL in order to restore its effectiveness and credibility. While IUFOST strongly supports this objective, the absence of a complementary principle requiring the use of PAL where a relevant risk has been identified represents an important gap in the current text. IUFOST therefore encourages consideration of wording **that more clearly reflects both dimensions of PAL**: preventing unnecessary use while ensuring its application where justified by risk assessment.

Other than this point, IUFOST also considers that the proposed approaches related to gluten, gluten-containing sources, and allergy to wheat have been appropriately reflected in the draft Guidelines.

#### **Agenda Item 8: Emerging Issues**

Consideration of Emerging Issues and Future Work – Ultra-Processed Foods (UPF)

The International Union of Food Science and Technology (IUFOST) confirms its strong interest in the issue of so-called "ultra-processed foods" (UPFs) as **an emerging topic that may warrant consideration within the Codex Alimentarius**, including within the mandate of the Codex Committee on Food Labelling (CCFL).

IUFoST recalls that it previously submitted a discussion paper for consideration by CAC48 addressing the scientific, regulatory, and policy implications associated with current food classification approaches related to UPFs.

More specifically in relation to the mandate of CCFL, IUFoST **notes with concern the ongoing** development and possible proliferation of regulatory measures in some jurisdictions where classifications derived solely from the extent of processing are increasingly being used as the basis for front-of-pack labelling (FoPL) measures. IUFoST recalls that Codex guidance on Front-of-Pack Nutrition Labelling and nutrient profiling was developed on the basis that food classification systems underpinning such measures should rely on scientifically robust, transparent, and fit-for-purpose methodologies.

In this regard, IUFoST reiterates that **food classification systems intended to support regulatory measures, including FoPL schemes**, should be supported by sound and reproducible scientific methodologies. IUFoST remains concerned that certain approaches currently being propagated rely predominantly on a single-parameter classification system centered on the extent of processing, without adequately addressing broader dimensions relevant to food characterization, including nutritional composition, and overall dietary context.

IUFoST further recalls the position it presented at CAC48 that the issue of UPFs is inherently cross-cutting and cannot reasonably be addressed by a single Codex subsidiary body acting in isolation.

While CCFL may be called upon to consider implications related to food labelling and front-of-pack systems, the issue also intersects with the work of other Codex committees, including the Codex Committee on Food Additives (CCFA), where the notion of “ultra-processed foods” is at times incorrectly associated with the use of additives, as well as broader food certification practices that are increasingly emerging in the marketplace, with linkages to the notion of “UPF”. IUFoST therefore reiterates that guidance from the Codex Alimentarius Commission itself may be required to determine how Codex should collectively and coherently address this issue across its subsidiary bodies.

IUFoST further emphasizes that Codex remains the most appropriate international forum to address this matter given its unique role at the intersection of policy agendas related to health, trade, agriculture, and consumer protection. Fragmented or uncoordinated approaches outside a Codex framework risk leading to inconsistent terminology, divergent policy applications, and unnecessary confusion for consumers, regulators, and international trade.

IUFoST also wishes to express concern regarding the broader narrative implications associated with the current discourse surrounding UPFs. Through the propagation and policy use of simplified processing-based classification systems, **food processing itself is increasingly being portrayed negatively or inaccurately as inherently detrimental**. IUFoST considers this trend highly concerning given the essential role of food processing in supporting food safety, food security, shelf-life extension, food fortification, nutrient delivery, humanitarian food assistance, innovation, and sustainable food systems.

In this context, IUFoST reiterates the importance of ensuring that any future discussions, including any scientific advice sought from FAO and WHO, adopt a genuinely multidisciplinary approach. Consideration of this issue should not rely exclusively on the lens of nutrition science alone but should also fully integrate the perspectives and expertise of food science and technology. IUFoST therefore emphasizes **that any expert consultations or advisory processes supporting Codex deliberations should include not only nutrition scientists, but also food scientists, food technologists, and experts in food processing and food systems**.

Accordingly, IUFoST encourages the Commission to provide guidance on an appropriate and coordinated Codex pathway for addressing food classification systems and the evolving discourse surrounding UPFs, including identifying how relevant subsidiary bodies such as CCFL may contribute within their respective mandates while maintaining coherence across the Codex system.