



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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WORK OF THE CODEX COMMITTEE ON FOOD LABELLING (CCFL)

(CX/CAC 24/47/15 and CX/CAC 24/47/15 Add.1)

(Comments of Argentina, Bangladesh, El Salvador, India, South Africa)

Argentina

Parte 1: Normas y textos afines presentados para su aprobación definitiva.

Revisión de la Norma general para el etiquetado de los alimentos preenvasados (CXS 1- 1985): Disposiciones pertinentes para el etiquetado de alérgenos- REP24/FL, Párrafo 52(i), Apéndice II N10-2019. Trámite 8.

Directrices para el suministro de información alimentaria sobre alimentos preenvasados ofrecidos a través del comercio electrónico REP24/FL, Párrafo 104 Apéndice IV N09-2019. Trámite 8.

Directrices para el uso de la tecnología con miras a proporcionar información alimentaria en el etiquetado de los alimentos- REP24/FL, párrafo 144, Apéndice V N07-2021. Trámite 8.

Argentina agradece a las coordinaciones de los 3 grupos de trabajo y la labor del Comité para concretar estos 3 trabajos tan importantes para informar a los consumidores y facilitar el comercio internacional, es por ello que Argentina recomienda su aprobación en trámite 8.

Parte 2: Normas y Textos Afines presentados para su aprobación en el trámite 5.

Anexo de la Norma general para el etiquetado de los alimentos preenvasados (CXS 1- 1985): Directrices para el uso del etiquetado precautorio de alérgenos 1 - REP24/FL, párrafo 92 (i), (vii), (viii), Apéndice III N10-2019. Trámite 5.

- Argentina agradece la labor realizada por Australia, Reino Unido y Estados Unidos. Argentina considera que el documento aún no está en condiciones de avanzar al trámite 5. Teniendo en cuenta que este trabajo está vinculado a la labor del Comité del Codex sobre Higiene de los Alimentos (CCFH) sobre la gestión de alérgenos, es pertinente proporcionar al CCFH asesoramiento adicional sobre los avances para ayudar a mantener la coherencia entre los textos, especialmente en lo que respecta a las definiciones y las listas de alérgenos prioritarios.
- Con relación a la posibilidad de establecer valores umbrales, si bien el documento remitido para la reunión de la CAC atenuó la obligatoriedad del uso de dichos umbrales, sin embargo se ha mantenido su mención. Por ello es que se recomienda remitir nuevamente los siguientes comentarios:
- El texto del punto 4.3 proporciona claridad con respecto a la evaluación de riesgos y la medida práctica de alérgenos no deseados de manera consistente con las consideraciones del informe del Comité de Expertos, al tiempo que aborda las complejidades locales con respecto a los datos de consumo. Dado que en los informes del Comité de Expertos no se consideraron las dosis de referencia para el centeno, la cebada o el gluten, no deberían considerarse en el cuadro del 4.3.1.
- Se mantiene la posición remitida oportunamente. Se considera que la evaluación de riesgo cuantitativa no debe ser definitiva al momento de decidir la utilización de PAL (etiquetado precautorio de alérgenos), tal como se plantea en el ítem 4.3 de este anteproyecto de directriz. Por otro lado, debería plantearse si el RfD (dosis de referencia recomendadas) debería ser del alérgeno en sí o de la posible presencia de los alérgenos totales en el alimento final o de su consumo en simultáneo con otros alimentos en similar situación.

- Asimismo, de acuerdo a las conclusiones obtenidas en el Informe RiskAssessment of FoodAllergens. Part 2: Review and establish threshold levels in foods for the priority allergens, las dosis de referencia (RfD) recomendadas en el informe se pueden implementar y monitorear hasta cierto punto con las capacidades analíticas actuales. Todos los métodos tienen limitaciones importantes y se las deben tener en cuenta al interpretar y utilizar los resultados.
- Además, se considera que la redacción del texto se ha vuelto demasiado complicado para la GSLPF y que es demasiado específico dado que están disponibles otros métodos de cálculo basados en el uso de Dosis de Referencia. Cabe señalar, que una Evaluación Cualitativa de Riesgos no siempre es adecuada a la hora de decidir el uso de PAL. Además, se necesita urgentemente desarrollar capacidades para que los miembros realicen evaluaciones de riesgos, con relación a ello, la FAO y la OMS son muy conscientes de esta necesidad y están evaluando sobre cómo hacerlo en colaboración o asociación con los países.
- Considerando que la mayoría de las respuestas apoyaron la propuesta de no incluir una disposición para el uso de un indicador de evaluación de riesgos principalmente debido a la dificultad práctica que esto supondría tanto para los operadores de empresas alimentarias como para las autoridades alimentarias nacionales. Es por ello que se considera que el proyecto de directrices PAL no debería incluir ninguna disposición relativa a un indicador cuantitativo de evaluación de riesgos.
- Por los motivos expuestos, consideramos que es prematuro avanzar este documento a trámite 5.

Bangladesh

Document: CX/CAC 24/47/15

Part 2: Standards and related texts submitted for final adoption

Revision to the General standard for the labelling of prepackaged foods (CXS 1-1985): Provisions relevant to allergen labelling

Bangladesh applauds the progress made by CCFL in updating the provisions of the general standard on prepackaged foods related to food allergens. Bangladesh also appreciates that this progress benefited from the scientific advice provided by the Expert Consultation on Food Allergens by FAO and WHO.

Bangladesh supports the adoption of the provisions related to the labelling of food allergenic ingredients at Step 8.

Part 2: Standards and related texts submitted for adoption at Step 5

Annex to the General standard for the labelling of prepackaged foods (CXS 1-1985): Guidelines on the use of precautionary allergen labelling

Bangladesh supports the progress made by CCFL in moving forward with a dedicated guideline for the use of Precautionary Allergen Labelling (PAL) and supports its adoption as a draft standard at Step 5.

Bangladesh noted the discussions related to the need to invest in capacity building efforts to support propagation of best practices related to the conduct of risk assessment by Food Business Operators, prior to resorting to PAL. Bangladesh expresses its interest to benefit from such efforts.

El Salvador

Se apoya aprobar las normas y los textos afines presentados para su aprobación definitiva que se enumeran en la Parte 1 de este documento 4.13. Directrices para el uso de la tecnología con miras a proporcionar información alimentaria en el etiquetado de los alimentos.

India

Part 1:

1. Revision to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Provisions relevant to allergen labelling
2. Guidelines on the provision of food information for pre-packaged foods to be offered via e-commerce
3. Guidelines on the use of technology to provide food information in food labelling

India supports this work for adoption

Part 2:

1. Annex to the General standard for the labelling of pre-packaged foods (CXS 1-1985): Guidelines on the use of precautionary allergen labelling

India supports adoption of this work at Step 5

Part 3:

1. New work proposal on application of food labelling provisions in emergencies

India supports this new work proposal**South Africa****PART 1 – STANDARDS AND RELATED TEXTS SUBMITTED FOR FINAL ADOPTION****REVISION TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): PROVISIONS RELEVANT TO ALLERGEN LABELLING**

(i) forward the draft revision to the *General standard for the labelling of pre-packaged foods (CXS 1-1985): provisions relevant to allergen labelling to CAC47 for adoption at Step 8 (Appendix II)*

SA comments: South Africa supports the adoption of the draft revision to the General standard for the labelling of pre-packaged foods - provisions relevant to allergen labelling at step 8.

Rationale:

- We are of the opinion that the considerable progress had been made at CCFL 48 and the committee had reached majority consensus on all outstanding texts, and also agreed that the draft document was ready to advance in the final Step procedure.
- The draft revision contains appropriate requirements that will assist consumers to make safe food choices, and also increase harmonization and facilitate trade.

(ii) inform CCFH of the completion of the revisions in particular the definitions and the new list of foods or ingredients that should be declared on a label to ensure consistency with the Code of practice on allergen management for food business operators (CXC 80–2020).

SA comments: South Africa agrees that it is necessary to inform CCFH of the completion of the revisions on the “definitions and the new list of foods or ingredients” that should be declared on a label.

Rationale: This will help to ensure consistency with the Code of practice on allergen management for food business operators (CXC 80–2020) and also increase harmonization and facilitate trade.

GUIDELINES ON THE PROVISION OF FOOD INFORMATION FOR PREPACKAGED FOODS TO BE OFFERED VIA E-COMMERCE

SA comments: South Africa supports the adoption of the guidelines on the provision of food information for pre-packaged foods offered via e-commerce at Step 8.

Rationale:

- We are of the opinion that the considerable progress had been made at CCFL 48 and the committee had reached majority consensus on all outstanding texts, and also agreed that the draft document was ready to advance in the final Step procedure.
- We are also of the opinion that the guidelines contain relevant and appropriate information aimed at providing guidance regarding food information that should be provided at the point of e-commerce sales.
- The guidelines will help consumers to make informed choices when purchasing food products

GUIDELINES ON THE USE OF TECHNOLOGY TO PROVIDE FOOD INFORMATION IN FOOD LABELLING

SA comments: South Africa supports the adoption of the guidelines on the use of technology to provide food information at step 8.

Rationale:

- We are of the opinion that considerable progress had been made at the CCFL 48 and the committee had reached majority consensus on all outstanding texts, and also agreed that the draft document was ready to advance in the final Step procedure.
- The guidelines provide appropriate guidance regarding food information that should be provided using technology. This could assist consumers to make informed choices, also increase harmonization and facilitate trade.

PART 2 – STANDARD AND RELATED TEXT SUBMITTED FOR ADOPTION AT STEP 5

ANNEX TO THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS (CXS 1-1985): GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING

(i) forward an Annex to the Guidelines on the use of precautionary allergen labelling to CAC47 for adoption at Step 5 (Appendix III).

SA comments: South Africa supports the advancement of the Guidelines on the use of precautionary allergen labelling to step 5.

Rationale:

- We are of the opinion that the considerable progress had been made at CCFL 48 and the committee had reached majority consensus that the text was ready to advance in the Step procedure. We are also of the opinion that the advancement of the document in the step procedure will allow further consideration of the outstanding texts in the draft document.
- Consistent and harmonised approaches to the use of PAL would be helpful in communicating allergen risks and provide more guidance on allergen management to consumers so they can make informed choices when purchasing food products.
- It will also help in ensuring fair trade because currently there is no harmonised precaution allergen labelling since food industry uses various forms of “may contain” statement which are often inconsistent.

(ii) inform CCMAS of progress on the Guidelines and encourage CCMAS to provide advice on suitable methods of analysis before CCFL49.

SA comments and Rationale: South Africa agrees that it is always beneficial to inform CCMAS on the progress made on the Guidelines and also seek advice on suitable methods of analysis as CCMAS is the only relevant expert committee on methods of analysis, hence the request is within their scope of work.

(iii) inform CCFH of

(a) the progress on the Guidelines on PAL; and

(b) the request made to FAO/WHO to provide guidance on qualitative risk assessment.

SA comments and Rationale: South Africa agree that it is always necessary to inform CCFH on the progress made on the Guidelines on PAL to ensure consistency with the *Code of Practice on Allergen Management for Food Business Operators* with the revision to the GSLPF and the guidelines on the use of PAL (including its risk assessment).

- We are also of the opinion that the request made to FAO/WHO to provide guidance on qualitative risk assessment is necessary as - guidance could help to indicate the risk of the presence of allergens aimed to protect the health of consumers.

PART 3 – PROPOSAL TO UNDERTAKE NEW WORK OR REVISE A STANDARD**NEW WORK PROPOSAL ON APPLICATION OF FOOD LABELLING PROVISIONS IN EMERGENCIES**

SA comments: South Africa supports the development of new work on the application of food labelling provisions in emergencies.

Rationale: We are of the opinion that the new work will help in providing guidance regarding food labelling in emergencies. This will help in ensuring consumers health protection, food safety and adequate food supply during emergencies to ensure fair trade and to prevent food waste.