



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

Forty-ninth Session

Ottawa, Canada

11-15 May 2026

REPORT OF THE PHYSICAL WORKING GROUP ON THE DRAFT REVISIONS TO THE DRAFT GUIDELINES ON THE USE OF PRECAUTIONARY ALLERGEN LABELLING

*Prepared by the Chair, the United States of America, and co-chairs, Australia and the United Kingdom, of the
Physical Working Group*

INTRODUCTION

The hybrid Physical Working Group (PWG) met on 10 May 2026 prior to the 49th session of the Codex Committee on Food Labelling (CCFL49). The PWG Chair gave an overview of the work to date. CCFL48 agreed to advance the draft guidelines to step 5 and re-establish the electronic working group (EWG) to continue the work, considering the discussions at CCFL, the scientific advice received to date, and advice from CCMAS. Two rounds of EWG consultation and a Circular Letter (CL) were provided.

CCFL48 agreed to request additional scientific advice in support from FAO/WHO on qualitative risk assessment and on the level of reference doses (RfD) or concentration for cereals containing gluten. FAO/WHO was also requested to provide capacity building activities to countries on PAL risk assessment. Key recommendations of the two FAO/WHO meetings were incorporated into the draft under consideration by the EWG, specifically the advice on conducting risk assessments and the RfD of 4mg total gluten for risk assessment of unintended presence of gluten and cereals containing gluten. CCMAS confirmed that methods are available to detect and quantify unintended allergen presence in foods from cross contact with suitable limits of detection and quantification (CX/FL 36/49/3 Add.2).

A representative from FAO provided an overview of the scientific advice sessions that have informed this text to date. The most recent consultation related to cereals containing gluten concluded that a RfD of 4 mg gluten is recommended for risk assessment of unintended presence of gluten and cereals containing gluten as the basis for deciding whether or not precautionary allergen labelling (PAL) should be applied and that the previously established RfD of 5 mg total protein for wheat should be replaced with a RfD of 4 mg gluten.

The PWG focused the discussion on the draft guidelines on the use of PAL including suggestions incorporated from CX/FL 26/49/5 Add.1 rev.1.

SUMMARY OF THE DISCUSSION AND RECOMMENDATIONS BY SECTION

Section 4.2: PAL based on risk assessment and 4.3: When to use PAL

The chair noted that in Section 4.2, an additional footnote (2bis) was added as a placeholder for the final risk assessment report from FAO/WHO when available; the PWG agreed with this insertion.

The Chair noted the support in the EWG for “should only” with the intention of minimizing over the over-use of PAL when unintended allergen presence (UAP) is below the action level while allowing more flexibility than “shall only”. The Chair also noted the addition of wording to reflect a proposed separation of Table 1 in 4.3.1 into two tables for IgE-mediated food allergy and coeliac disease.

There were divergent views in the PWG. Some raised concerns that “should only” restricts the use of PAL to quantitative risk assessments and suggestions to delete “only” were heard by several PWG members. Other members supported “should only” or “shall” to ensure PAL is risk-based and based on action level.

There was a proposal to change the word “shall” to “should be limited to cases where”. There was some support for this proposal. Other members indicated a preference to maintain the term “shall be used when” instead. There was recognition in the PWG that these two options related to two different concepts: one that established that PAL must be used when unintended food allergen presence cannot be mitigated below the action level, and one that further specified that its use should be limited to those cases. Noting the lack of consensus, the Chair proposed maintaining both options in square brackets and recommending that CCFL49 consider these taking into account the discussion at the PWG.

There was a proposal to include additional text to clarify that PAL may be based on the result of a qualitative risk assessment where the possibility of the presence of the allergen is determined. The Chair clarified that the principles in Section 4 should be considered collectively and noted that in CCFL48, risk assessment was removed from 4.3 since it is addressed in 4.2. Some members felt the clarifying language was necessary to avoid a contradiction between 4.2 and 4.3. Other members felt the additional text was already covered sufficiently by 4.2.

FAO clarified that the reference dose is a numeric outcome and using that number in a risk assessment does not automatically make it quantitative and viewed the additional text as duplicative. It was noted that members did not have access to the full FAO/WHO report and some members felt that in light of this it was important to mention qualitative risk assessment.

Noting the concerns raised with the additional clarifying language and the need from members to refer to qualitative risk assessment, the Chair proposed to include “both qualitative and quantitative risk assessment” in section 4.2. The PWG agreed with this compromise and path forward, and the additional text to address risk assessment in section 4.3 was removed.

One member noted that Footnote 3 in 4.3 refers to an FAO/WHO expert report which uses 50th percentile for consumption, which is not consistent WHO chemical risk assessments, which use 97.5% to cover higher consumers. WHO clarified chemical risk assessments are a different context than food allergens and Part 3 of the report referenced in Footnote 2 uses 50%. The Chair clarified that there is flexibility in the current for a competent authority to use a different percentile. The PWG agreed to maintain the text of Footnote 3.

Recommendations for Section 4.2: PAL based on risk assessment and 4.3: When to use PAL

The PWG recommends that CCFL49 consider and agree the revised text in section 4.2. CCFL49 is invited to further consider and discuss the text in square brackets in 4.3 on when to use PAL “shall be used when” or “should be limited to cases where”. The text is in Appendix I and shown below.

- 4.2** The decision to use PAL should be based on the findings of a risk assessment^{2,2bis}, which can include ~~but is not limited to~~ both qualitative and quantitative risk assessment, of unintended food allergen presence.
- 4.3** PAL [shall be used when / should be limited to cases where] it is demonstrated that unintended presence of a food allergen(s) cannot be mitigated to a level at or below the action level³ for the allergenic food based on the reference doses in tables at 4.3.1 for IgE-mediated food allergy and 4.3.2 for coeliac disease.

Section 4.3.1: Table of reference doses

The PWG Chair provided feedback received during the EWG and in response to the CL that the table should include 5 mg total protein for wheat to prevent confusion for risk assessments, and FAO clarified during their presentation that 5 mg total protein is the same as 4 mg gluten from wheat, and either value is sufficiently protective for IgE allergic consumers. The Chair clarified that 4 mg was for total gluten for all sources. In response to feedback from the CL, the Chair proposed to separate the reference doses into two tables to better illustrate the difference between the RfDs for IgE-mediated food allergies and coeliac disease.

One member suggested the title of the tables be changed from “risk assessment” to “risk analysis” since the tables will be used for both risk assessment and risk analysis. This suggestion was agreed by the PWG.

While a few members indicated preference for a single table, there was general agreement for the two tables as proposed and presented to the PWG.

One observer organization raised concerns about vulnerable populations being taken into account by the FAO/WHO expert report. FAO clarified that Report 1, Annex 3 explains which populations were considered and would address the concern.

One member proposed clarifying that oats are not a priority allergen in the GSLPF, do not contain gluten, and therefore have no RfD for gluten has been established for oats. However, individuals may react due to cross-contact with gluten-containing grains. A footnote “*” was proposed. One member suggested edits to clarify that the GSLPF does not refer to non-priority allergenic foods; this edit was incorporated. There were no objections to the new footnote regarding oats.

Recommendations Section 4.3.1: Table of reference doses

It is recommended that CCFL49 move forward with two tables for further consideration. The PWG also recommends that CCFL49 consider the proposal for a footnote to address oats.

***Oats have been listed in the *General standard for the labelling of prepackaged foods (CXS 1-1985)* as an allergenic food (paragraph 4.2.1.5). However, oats are not a cereal containing gluten, and therefore no specific RfD for gluten has been established for oats. Individuals with coeliac disease may react to the ingestion of oats due to either wheat, barley or rye cross-contact, which are already addressed in table 4.3.1.**

Section 4.3.2: No reference doses established

The Chair provided background that when no reference doses have been established, the provision allows for regional/competent to establish reference doses based on same principles FAO/WHO used to establish reference doses. There was general support for this section as shown during the PWG.

Recommendation Section 4.3.2

It was recommended that CCFL49 consider and agree the text as shown in Appendix I.

4.3.2 Where a reference dose is not established for a particular allergenic food in table 4.3.1 above, regional/national competent authorities can establish a reference dose consistent with recognized principles⁴ for the purposes of determining an action level.

Section 4.3.3: PAL and gluten free claims

The Chair noted that the EWG had considered, in accordance with the advice from the expert consultations, how to address situations where a product could contain both PAL and “gluten-free” claims. The EWG explored several options and the Chair explained that there was consensus in the EWG not to have “gluten-free” claims on labels where PAL is present.

Members agreed with several clarifying edits as follows:

- change “is used” to “is necessary” to reflect the risk-based underpinnings of PAL;
- add a footnote (4bis) to reference the “gluten-free” labeling standard (CXS 118-1979);
- add a parenthetical of “wheat, barley, and rye” to clarify cereal(s) containing gluten.

One member expressed hesitation that the definition of gluten-free foods in the CXS 118-1979 refers to “oats” which could create a potential conflict with the proposed footnote text. Noting that there were no objections to the inclusion of the reference to the CXS 118-1979, the Chair proposed that the PWG maintain it and that members reflect on any potential conflicts before the discussion at plenary.

Recommendation for Section 4.3.3: PAL and gluten free claims

The PWG recommends that CCFL49 consider and agree the text of Section 4.3.3 with the amendments incorporated by the PWG. The PWG recommends the footnote 5 (formerly 4bis) be further considered during plenary.

4.3.3. If a PAL statement for cereal(s) containing gluten (wheat, barley, and rye) is necessary, then the term “gluten-free” shall not be used.⁵

[⁵“Gluten-free” foods as defined in the *Standard for foods for special dietary use for persons intolerant to gluten (CXS 118-1979).*]

Section 4.4 Education/information programs

The Chair noted the EWG agreement that education is a critical aspect in accompanying PAL. Several options were considered during the EWG and edits were incorporated following the CL to specify who is responsible for leading these programs and how they should go forward.

One member expressed concerns about education being “led” by competent authorities and preferred “supported” as initiatives may be developed by other stakeholders with oversight or agreement from competent authorities. Several other members supported this change, which was incorporated by the PWG.

Some members preferred “shall” because they felt it education should be a mandatory requirement. No objections were raised to this change.

One observer organization expressed the need for an evaluation mechanism to evaluate how effective educations programs are, capturing consumer understanding.

Recommendation for 4.4 Education/information programs

The PWG recommends CCFL consider and agree the below text as shown in Appendix I.

- 4.4 PAL ~~shall~~ ~~should~~ be complemented by education and information programs supported led by competent authorities to promote appropriate use of PAL by food business operators and proper understanding by consumers, healthcare providers, and other stakeholders.

Section 5: Presentation of PAL

The chair reminded the PWG that the text of Section 5.1 was adopted at CCFL48.

Section 5.2: Presentation of PAL: Placement when ingredient list is present

The PWG discussed that the agreement of the EWG was to use “shall” to align with the corresponding language on presentation of allergen labelling GSLPF.

Recommendation for Section 5.2

The PWG recommends that CCFL49 consider the text of section 5.2 with the term “shall.”

- 5.2 PAL ~~should~~ shall appear as a separate statement directly under or in close proximity to the ingredient list (when present).

Section 5.2.1: Placement when ingredient list is not present

The chair stated that edits were made to section 5.2.1 based on feedback received in the CL to align the guidance more closely with the language for declaration of allergenic foods in the GSLPF. One member suggested that “prominent position” be replaced with “visible position”; however, the Chair explained that “prominent position” was already used in section 8 of the GSLPF and for consistency it would be best to maintain that language. The PWG agreed to the text as presented.

Recommendation for Section 5.2.1

It is recommended that CCFL49 consider and agree the revised text as shown in Appendix I.

- 5.2.1 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 statement made in accordance with Section 8.3.2.1 of the GSLPF exists on the label, the PAL statement should be appear in the same field of vision as directly under or in close proximity to the separate statement.

Section 5.2.2: Presentation of PAL: The use of “may contain” or “equivalent words”

Members held differing views about the concept of “or equivalent words,” the importance of “may contain”, and on allowing flexibility.

- Some observer organizations expressed preference for a single PAL statement to be used and did not support any diversification of statements which they stated could confuse consumers, supporting “may contain” as standardized wording.
- Some members noted the intent of PAL is to reflect the risk of cross contact. For global trade, it may be easier to use “may contain” which is already used and clear for consumers. In relation to cross contact, a member suggested that the *Code of practice on food allergen management for Food Business Operators* (CXC 80-2020) be referenced.
- One member stated that language may vary across countries and regions, so it is important to give some flexibility to regional authorities to allow the most appropriate messaging for their consumers.
- One member expressed their view that an alternative statement (“not suitable for...”) should be included, based on consumer data in their own country showing it was the most preferred.
- One member noted that mandatory allergen labeling, per the GSLPF, starts with “Contains,” and asked if there is evidence to support that “may contains” is sufficiently clear for consumer understanding if both “contains” and “may contains” is present on the package.

Additional text was suggested to make explicit that the determination on the use of other equivalent words lies with the competent authorities.

Some members observer organizations expressed their view that one statement per jurisdiction is most helpful to consumers. The Chair explained that “A PAL statement” in 5.2.2 means one statement and recommended to move forward with the proposed edits and clarified that the *Code of practice on food allergen management for Food Business Operators* (CXC 80-2020) is referenced elsewhere in the document and is therefore not needed in this section.

The PWG also agreed to the remaining language linking to the specified names in Sections 4.2.1.4 and 4.2.1.5 of the GSLPF.

Recommendation for Section 5.2.2, use of “may contain” or “equivalent words”

The PWG recommends that CCFL49 consider and agree the proposed text for 5.2.2, retaining “or equivalent words” with the additional language about competent authorities.

Sections 5.2.2 and Section 5.2.3: Gluten above action levels, when source isn’t known

The PWG discussed several remaining issues associated with both sections 5.2.2 and 5.2.3. Members expressed differing views on how to declare cereals containing gluten above the action level when the source is known and when the source cannot be verified by risk assessment.

The PWG discussed the footnote in 4ter, which used the same language as the GSLPF: “In addition to the specified name of wheat, rye, and barley, the word ‘gluten’ may be used.” Which allows “gluten” as an optional additional term.

One member noted the context in these sections is different than what is covered by the GSLPF, which covers intentional addition of the allergen, whereas this guideline covers unintentional or cross-contact. The member stated the important information for the consumer is the presence of gluten itself, not the presence of rye and barley. Their preference was to declare ‘gluten’ in all situations, not just where the source was unknown. An addition to 4ter was suggested “The term ‘gluten’ may be used instead of ‘rye’ and ‘barley’.

Members also raised the issue of when wheat can be excluded as the source of gluten. It was suggested that “cereals containing gluten” could be a suitable compromise to encompass rye and barley while being more familiar to consumers who are looking for the word “gluten”.

Some members expressed a desire to have the option to label collectively as “gluten” with no specific names because the familiarity of “gluten” would be sufficient for both coeliac and IgE-mediated allergies. They suggested to include some flexibility for the competent authority to allow for the use of terms in a local context. Other members felt “wheat” should be listed to inform IgE-mediated allergenic consumers.

The chair proposed language in Section 5.2.3 for when gluten is above the action level and the source of gluten cannot be verified by risk assessment, proposing that “wheat shall be used” to ensure that wheat would always be declared.

Members held differing views when the use of “gluten” was appropriate in addition to the specified name in the case when the source of gluten is known (5.2.2) and not known (5.2.3).

An observer organization shared their technical perspective that when the source of gluten is not known but it is known that it is not from wheat, labeling “wheat” would be misleading from labeling perspective. In light of this, a member supported reverting back to the original language, “the specified names of all cereals containing gluten (i.e. wheat, barley, and rye) shall be included in the PAL statement”.

It was suggested that separate footnotes for 5.2.2 and 5.2.3 should be used.

One member expressed the view that the intent of this document is to provide competent authorities with guidance on how to implement PAL relative to their local population and understanding. Some consumers may look for “barley” and “rye” to signify gluten, but others may look specifically for gluten and additional words could detract. The member expressed the need for flexibility for the competent authority to use terms in a local context. They stated that this option to be able to use the term ‘gluten’ instead of ‘rye’ and ‘barley’ would apply equally to 5.2.2 and 5.2.3, such that a label could declare “wheat and gluten”.

Varying views were expressed about how 5.2.2 and 5.2.3 should address unintended allergen presence, when the source is known and not known. There was agreement that in cases where the specific name was required, “gluten” could also be used in addition, optionally. The proposals were as follows:

5.2.2, If the source of the unintended allergen presence is known:

- It must be declared by the specified name (“wheat,” “barley,” “rye”)
- If the source of the unintended allergen presence was a cereal containing gluten (not wheat), could be declared as “cereals containing gluten”
- If the source of the unintended allergen presence was a cereal containing gluten (including wheat), could be declared as “cereals containing gluten”
- Regardless of which cereal is present, (including wheat), could be declared collectively as “gluten”

5.2.3, When gluten is present and the source is not known or cannot be verified:

- All of the names of the cereals (“wheat,” “barley,” “rye”) need to be declared.
- If it is known that the source is not wheat, then the “barley” and “rye” would need to be declared.

- If it is known that the source is not wheat, then the barley and rye could be declared as “cereals containing gluten”
- Regardless of if it is known that the source is wheat, these could be declared collectively as “wheat, cereals containing gluten”
- Regardless of if it is known that the source is wheat, these could be declared collectively as “wheat, gluten”

Recommendations for Section 5.2.2 and 5.2.3 and Footnotes 6 (formerly 4ter) and 7 (formerly 4quater)

CCFL49 is invited to consider the revised text of 5.2.2 and 5.2.3.

The PWG concluded that separate footnotes for 5.2.2 and 5.2.3 were necessary given the different scenarios the two sections cover and divergent views. The Committee is invited to consider the text of the two footnotes including the text in square brackets.

5.2.2 A PAL statement shall commence with the words ‘May contain’ (or equivalent words such as ‘may be present’, as determined by the competent authorities) and 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).⁶

5.2.3 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.⁷

⁶ In addition to the specified name of wheat, rye, and barley, the word ‘gluten’ may be used.

⁷ In addition to the specified name of wheat, rye, and barley, the word ‘gluten’ may be used. [The word [‘gluten’ OR ‘cereals containing gluten’] may be used instead of the words ‘rye’ or ‘barley’].

Section 5.2.4: Presentation of PAL

1. The Chair explained this section is similar to the declaration in the GSLPF and presented the text as shared in the CL noting there was general support for this section in the EWG and the CL.

One member noted that PAL statements and allergen declarations may both be on the same package and the same method of presentation should be used for both types of statements, additional text was suggested to clarify. The PWG agreed with this suggestion.

Recommendation for Section 5.2.4

The PWG recommends that CCFL49 consider and agree the revised text in Appendix I.

5.2.4 A PAL statement shall be declared in a clear and distinct manner such as through the use of font type, style or colour that contrasts from the surrounding text in accordance with section 8.3.1 of the General Standard for the labelling of prepackaged foods (CXS 1-1985). Where both a PAL statement and an allergen declaration are present, these shall be declared using the same clear and distinct manner.

CONCLUSION AND RECOMMENDATIONS

The PWG invites CCFL49 to:

- Consider the proposed draft guidelines (Appendix I); and
- Consider if the text is ready for advancement to final adoption at step 8.

APPENDIX I

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

At Step 7

(Proposed additions and/or revisions to the draft text are indicated in **bold and underline** text while deletions are indicated in ~~strike through~~)

1. PURPOSE

To facilitate a consistent and harmonized approach to the effective use of precautionary allergen labelling (PAL) for communicating to consumers with food allergy or coeliac disease about the risk from the unintended presence of food allergens due to cross-contact with allergenic food.

2. SCOPE

These guidelines apply to PAL when used in the labelling of pre-packaged foods to indicate the risk from the unintended presence of a food allergen(s) caused by cross-contact¹ with allergenic food.

3. DEFINITIONS

For the purpose of these guidelines, the following definition shall be used in conjunction with the definitions in Section 2 of the *General Standard for the labelling of pre-packaged Foods* (CXS 1-1985):

“Precautionary allergen labelling” *is a statement made in the labelling of pre-packaged foods to indicate a risk from the unintended presence of a food allergen(s) due to cross-contact with an allergenic food that has been identified by a risk assessment.*

4. GENERAL PRINCIPLES

- 4.1 Effective food allergen management practices including controls to prevent or minimize the unintended presence of a food allergen(s) caused by cross-contact with allergenic foods shall be implemented in accordance with the Code of practice on allergen management for food business operators (CXC 80-2020). The use of PAL shall be restricted to those situations in which the unintended presence of a food allergen(s) cannot be prevented or controlled using these allergen management practices.
- 4.2 The decision to use PAL should be based on the findings of a risk assessment^{2,2bis}, which can include ~~but is not limited to a~~ **both qualitative and** quantitative risk assessment, of unintended food allergen presence.
- 4.3 PAL **[shall be used when / should be limited to cases where]** it is demonstrated that unintended presence of a food allergen(s) cannot be mitigated to a level at or below the action level³ for the allergenic food based on the reference doses in tables ~~at~~ 4.3.1 **for IgE-mediated food allergy and 4.3.2 for coeliac disease.**

¹ Allergen cross-contact as defined in *Code of practice on allergen management for food business operators* (CXC 80-2020).

² FAO and WHO (2023). *Risk assessment of food allergens – Part 3: Review and establish precautionary labelling in foods of the priority allergens* (Sections 3.3.1 to 3.3.6 provide guidance for the risk assessment of unintended food allergen presence). <https://doi.org/10.4060/cc6081en>

^{2bis} Placeholder for reference to the part 6 FAO/WHO guidance on risk assessment <https://www.fao.org/food-safety/scientific-advice/food-allergens/en>.

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 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.

Table 4.3.1 Reference doses for allergenic foods relevant to IgE-mediated food allergy risk assessment[†]

Allergenic Food (IgE-Mediated Food Allergy)	Reference Dose (RfD) (mg <u>total protein</u> from allergenic food)
Almond	1.0
Brazil Nut	1.0
Cashew	1.0
Pistachio	1.0
Macadamia	1.0
Pine Nut	1.0
Walnut	1.0
Pecan	1.0
Celery	1.0
Mustard	1.0
Peanut	2.0
Egg	2.0
Milk	2.0
Sesame	2.0
Hazelnut	3.0
Wheat	5.0
Fish	5.0
Buckwheat	10.0
Lupin	10.0
Soy	10.0
Crustacea	200.0

Table 4.3.2 Reference dose for gluten relevant to coeliac disease risk assessment[†]

Cereals Containing Gluten* (Coeliac Disease)	Reference Dose (RfD) (mg of <u>total gluten</u> from all relevant sources)
Gluten from all relevant sources: – wheat and other Triticum species – rye and other Secale species – barley and other Hordeum species and products thereof [†]	4.0

[†] Includes spelt, Khorasan, and other specific cereals containing gluten that are species or hybridized strains under the genus names of *Triticum*, *Secale* and *Hordeum*.

***Oats have been listed in the *General standard for the labelling of prepackaged foods* (CXS 1-1985) as an allergenic food (paragraph 4.2.1.5). However, oats are not a cereal containing gluten, and therefore no specific RfD for gluten has been established for oats. Individuals with coeliac disease may react to the ingestion of oats due to either wheat, barley or rye cross-contact, which are already addressed in table 4.3.1.**

- 4.3.2 Where a reference dose is not established for a particular allergenic food in table 4.3.1 above, regional/national competent authorities can establish a reference dose consistent with recognized principles⁴ for the purposes of determining an action level.
- 4.3.3. If a PAL statement for cereal(s) containing gluten (**wheat, barley, and rye**) is **necessary**, then the term “gluten-free” shall not be used.^[5]
- 4.4 PAL ~~shall~~ **should** be complemented by education and information programs **supported led** by competent authorities to promote appropriate use of PAL by food business operators and proper understanding by consumers, healthcare providers, and other stakeholders.
5. **PRESENTATION OF PAL**
- 5.1 Section 8.1.1, 8.1.2 and 8.1.3 and 8.2 of the *General Standard for the labelling of pre-packaged foods* (CXS 1-1985) apply to PAL labelling.
- 5.2 PAL ~~should~~ **shall** appear as a separate statement directly under or in close proximity to the ingredient list (when present).
- 5.2.1 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 statement made in accordance with Section 8.3.2.1 of the GSLPF exists on the label, the PAL statement **should be appear in the same field of vision as directly under or in close proximity** to the separate statement.
- 5.2.2 A PAL statement shall commence with the words ‘May contain’ (or equivalent words **such as ‘may be present’, as determined by the competent authorities**) and 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).⁶
- 5.2.3 **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.**⁷
- 5.2.4 A PAL statement shall be declared in a clear and distinct manner such as through the use of font type, style or colour that contrasts from the surrounding text in accordance with section 8.3.1 of the General Standard for the labelling of prepackaged foods (CXS 1-1985). **Where both a PAL statement and an allergen declaration are present, these shall be declared using the same clear and distinct manner.**

⁴ FAO and WHO (2022). Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens: Part 2: Review and establish threshold levels in foods of the priority allergens. <https://doi.org/10.4060/cc2946en>.

^[5] **“Gluten-free” foods as defined in the Standard for foods for special dietary use for persons intolerant to gluten (CXS 118-1979).**

⁶ **In addition to the specified name of wheat, rye, and barley, the word ‘gluten’ may be used.**

⁷ **In addition to the specified name of wheat, rye, and barley, the word ‘gluten’ may be used. [The word [‘gluten’ OR ‘cereals containing gluten’] may be used instead of the words ‘rye’ or ‘barley’].**