



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL



AFGC SUBMISSION

CODEX COMMITTEE ON FOOD LABELLING – Guidelines on the Use of Precautionary Allergen Labelling

12 May 2025

OVERVIEW

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to respond to the Codex Committee on Food Labelling (CCFL) request for comments on the the Guidelines on the Use of Precautionary Allergen Labelling (PAL).

It provides the following submission to assist the Australian Delegation leader prepare country comments.

The AFGC has had the opportunity to read the Allergen Bureau’s submission and supports its position.

RESPONSE

Question 1:

Which of the following versions of Section 4.3 do you support? Please rank the options in order of preference (first being the highest preference and last being the lowest). EWG Members should consider this choice in light of the agreed 4.1 and 4.2, as well as the proposed amendment to Section 4.3.2 (Question 2 below) which would allow competent authorities the ability to set alternative reference doses based on national risk.

A. PAL shall only be used when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1.

B. PAL should only be used when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1.

C. PAL shall be used when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1.

D. PAL should be used when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1.

E. (Alternative proposed text) When it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1, PAL should be used.

F. (Alternative proposed text) Only when it is demonstrated that unintended food allergen presence cannot be mitigated to a level at or below the action level³ for a food allergen based on the reference doses in the table at 4.3.1, PAL should be used.

Footnote 3: Action level (mg total protein from the allergen / kg food) = Reference dose (mg total protein from the allergen) / Amount of the food (kg). The amount of food should be established based on the quantity that can reasonably be expected to be consumed on a single eating occasion preferably using the 50th percentile.

Please provide your ranked preferences:

1 - B

2 - D

Please provide reasons for your answer:

As the AFGC understands, 'should' is defined as a recommendation and 'shall' is defined as a requirement, we are therefore of the view that option B offers the best combination of flexibility and clarity, though option D would be our second choice due to its similarity in intent and language. We prefer option B, as it makes most clear that PAL would be used **only** when the unintended food allergen presence cannot be mitigated at or below the action level based on the reference doses shown in table 4.3.1. These reference doses are valuable tools to develop quantitative risk assessments.

However, in some cases, it may be appropriate to utilise qualitative risk assessments for determining possible allergen presence as noted in section 4.2. Therefore, the use of “should” (in option B or D) allows for this needed flexibility, accommodating both risk assessment approaches (quantitative and qualitative) where applicable. Additionally, local allergen risk assessment methods and labeling regulations may need to be considered.

Question 2:

Do you support amending 4.3.2 to include flexibility for competent authorities to determine whether a reference dose is sufficiently protective for their population, as follows?

4.3.2 Where a reference dose is not established for a particular food allergen in the table to 4.3.1 above, **or when competent authorities determine based on a risk assessment⁴ that the reference dose is not sufficiently protective for the regional/national population,** regional or national competent authorities can establish a reference dose consistent with recognized principles⁵ for the purposes of determining an action level.】

Footnote 4: 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>

Footnote 5: 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>.

Yes ☒

No ☐

Please provide reasons for your answer:

The AFGC is of the view that the proposed amendment to section 4.3.2. ensures that a robust risk assessment is conducted to make the determination as to whether PAL is justified.

Question 3:

Do you support section 4.4 as follows?

4.4 PAL shall be accompanied by education/information programs to ensure understanding and appropriate use of PAL by consumers, health care providers and food business operators.

Yes ☒

No ☐

Please provide reasons for your answer:

The AFGC supports this section as it is critical for all these stakeholders to understand and appropriately use PAL to ensure consumer protection.

Question 4:

Do you support section 5 as proposed by the Chairs to align it with the corresponding section of the revisions to provisions relevant to allergen labelling in the GSLPF?

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 A PAL statement shall commence with the words 'May contain' (or equivalent words) and include the identified **declare the** allergenic food(s) using the specified names for the foods and ingredients as listed in sections 4.2.1.4 and where applicable 4.2.1.5 of the *General Standard for the labelling of pre-packaged foods* (CXS 1-1985).

5.2.2 A PAL statement shall **be declared in a clear and distinct manner such as through the use of contrast** distinctly from surrounding text such as through the same font type, style or colour **that contrasts from the surrounding text** used for declarations in accordance with section 8.3.1 of the *General Standard for the labelling of pre-packaged foods* (CXS 1-1985).

Yes ☒

No ☐

Please provide reasons for your answer:

The AFGC supports the proposed section 5 as we are of the view that it is important to be aligned and consistent with text used for allergen labelling in the *General Standard for the labelling of pre-packaged foods* (GSLPF) (CXS 1-1985).

For further information about the contents of this submission contact:

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