

RESPONSE FORM
Codex Committee on Food Labelling
Electronic Working Group on Allergen Labelling
2nd Consultation Paper

Please provide a response using this form and post on the Codex eWG Allergen Labelling online-forum by **15 February 2026**.

Name of Member Country/Observer: The Australian Food and Grocery Council

Question 1:

Do you support the proposed reference doses in Table 4.3.1 for the application of establishing action levels and risk management?

If yes, please explain your reason. If no, please explain your reason and offer an alternative based on established risk-based principles.

Yes

No

Reasons:

Yes. The Australian Food and Grocery Council supports the proposed reference doses (RfD) in Table 4.3.1 as a sound, science-based framework for establishing action levels and enabling consistent, risk-based management of unintended allergen presence.

The reference doses align with FAO/WHO expert advice and internationally recognised risk assessment principles (see [latest 2025 report from the joint FAO/WHO experts](#)), including the use of population threshold distributions, support for harmonised decision-making on the application of precautionary allergen labelling (PAL), consideration of portion size and consumption patterns, and adoption of a 4 mg gluten reference dose for PAL decision-making for cereals containing gluten.

Additional comments.

Terminology in column headings

The Australian Food and Grocery Council does not support the proposed change to the heading in column two. Alignment with FAO/WHO Expert Consultation [Report 2](#) is recommended, which uses the term “mg of total protein from the allergenic **source**”. It should be noted that CCMAS have recommended alignment for allergen test method developers, for results to be reported in “mg of total protein from the allergenic source”, as recommended by the FAO/WHO expert committee in [Report 3](#).

Application of the 4 mg gluten reference dose and wheat

The Australian Food and Grocery Council recommends that replacing the 5 mg wheat protein reference dose with a 4 mg gluten reference dose needs clearer explanation.

Wheat remains a priority allergen because some people have an IgE-mediated wheat allergy and cannot tolerate wheat, even if they can tolerate gluten. The Australian Food and Grocery Council therefore recommends that the table and guidance clearly state that the 4 mg gluten reference dose applies to PAL decision-making for **both** coeliac disease and IgE-mediated wheat allergy, that wheat continues to require specific consideration in risk assessment and labelling, and that a footnote or annotation explain how the 4 mg gluten reference dose is applied to wheat, noting that it is not expressed as total protein from the allergenic source.

Grouping of gluten-containing cereals

The Australian Food and Grocery Council understands that FAO/WHO expert advice treats gluten as a single group rather than separating wheat, rye and barley, because people with coeliac disease react to gluten from all these cereals in the same way. In practice, cereals are often mixed through cross-contact, and testing methods measure gluten overall, not individual cereal sources. Requiring businesses to calculate contributions from each cereal would add complexity without improving consumer safety.

The Australian Food and Grocery Council therefore recommends grouping gluten-containing cereals together in the table, in line with FAO/WHO advice, while keeping wheat listed separately as a priority allergen. Clear notes should explain how the gluten reference dose applies to wheat for people with IgE-mediated wheat allergy. This approach is practical, scientifically aligned, and supports clear and effective labelling for consumers.

*The RfD established for Gluten containing cereals is applicable to risk assessments for IgE mediate wheat allergy.

Wheat*		4.0
Gluten containing cereals (Barley, Rye, Wheat)		4.0

Question 2:

Which option (A, B, or C) do you support to clarify the use of “gluten free” and/or PAL statements in the circumstance where a product would qualify for “gluten free” and require a PAL statement for cereal(s) containing gluten? Please explain your reasoning.

Option A:

4.3.3bis If a food carries the term “gluten free” as per the *Standard for foods for special dietary use for persons intolerant to gluten* (CXS 118-1979), then a PAL statement for cereal(s) containing gluten shall not appear on the label.

OR

Option B:

4.3.3ter If a food requires a PAL statement for cereal(s) containing gluten, then the term “gluten free” shall not appear on the label.

OR

Option C: Allow both “gluten free” and a PAL statement for cereal(s) containing gluten to appear on the labels of the relevant products. This option would not require the inclusion of new text in the guidelines.

Option A

Option B

Option C

Reasons:

The Australian Food and Grocery Council supports Option B, which means that if a food needs a precautionary allergen labelling (PAL) statement for cereals containing gluten, the term “gluten free” should not appear on the label. This approach is the clearest for consumers and avoids mixed or contradictory messages.

The 4 mg gluten reference dose recommended by FAO/WHO is based on how much gluten a person may consume in one eating occasion, while the gluten-free limit of ≤ 20 mg/kg is based only on concentration and does not consider portion size. In some cases, a product could meet the gluten-free limit but still deliver more than 4 mg of gluten if eaten in a large serve. Using both a gluten-free claim and a PAL statement in these situations could confuse consumers, reduce trust in labels, and pose health risks, especially for people with wheat allergy.

Option B provides a simple, precautionary rule that better protects consumers and supports consistent labelling.

Question 3:

Do you support the proposed text presented in 5.2bis?

If yes, please explain your reason. If no, please explain your reason and offer amendments to the text

5.2bis For foods that do not have an ingredient statement, PAL shall be declared in a prominent position and in the same field of vision as any of the other mandatory elements listed in Section 4 of the GSLPF.

Yes

No

Reasons:

Yes. The Australian Food and Grocery Council supports the proposed wording in section 5.2bis.

It makes precautionary allergen labelling clearer and more consistent for foods that do not have an ingredient list and helps ensure allergen information is easy for consumers to see and understand.

Placing PAL alongside other mandatory labelling information improves consumer awareness and reduces the risk

that these warnings are missed or applied differently across products.

Question 4:

Do you have any other comments on the draft guidelines? If so, please provide them below.

Yes

No

Yes.

The Australian Food and Grocery Council provides the following for consideration:

- The Guidelines should reinforce that precautionary allergen labelling (PAL) is a last resort and should only be used after a documented risk assessment and strong allergen controls are in place.
- Labelling should be consistent and avoid mixed messages, such as combining claims and PAL statements, which can confuse consumers and undermine safety.
- Allergen information should be clear and not repeated unnecessarily. Repeating the same allergen in different ways can clutter labels and make them harder to understand without improving safety.

For example:

- where allergens are declared in a separate statement (e.g. "Contains: wheat, barley, gluten"), duplication within a PAL statement is unnecessary and may create confusion;
- where gluten is already clearly identified, repeating the term alongside each cereal (e.g. "wheat (gluten), barley (gluten)") does not add meaningful information for consumers;
- similarly, repetition within PAL statements (e.g. "May contain: wheat, barley, gluten" versus "May contain: wheat (gluten), barley (gluten)") should be avoided when the allergen risk has already been clearly communicated.
- Specified names for wheat, rye and barley should be used in ingredient lists, but PAL statements should use the collective term "gluten" when cross-contact comes from cereals other than wheat.
- Where both wheat and other gluten-containing cereals are involved, PAL should identify both wheat **and** gluten to ensure clear information for people with wheat allergy and coeliac disease.