

7 May 2019

**CODEX COMMITTEE ON FOOD LABELLING  
(Forty-fifth Session)  
Ottawa, Ontario, Canada, 13 – 17 May 2019**

**European Union Comments on**

**Agenda item 2: Matters referred to the Committee on Food Hygiene  
(CCFH50)**

**Matters for action: Code of practice on Food Allergen Management for  
Food Business Operators: precautionary allergen labelling**

*Mixed Competence  
European Union Vote*

The European Union and its Member States (EUMS) appreciate the work carried out by the Committee on food hygiene (CCFH50) in the field of precautionary allergen labelling. The EUMS are of the opinion that the use of a precautionary allergen labelling needs to be clarified and framed in order to ensure that allergic consumers can benefit from the largest choice of foods.

The EUMS support the proposed definition of precautionary allergen labelling. With regard to the appropriateness of the use of a precautionary allergen labelling statement, the EUMS are of the view that the proposed code of practice on food allergen management adequately addresses an important issue, namely that certain warning statements such as 'may contain' are present on a number of food labels although no assessments were performed by the food business operator of the likelihood of the accidental presence of the allergen in question in the food and of the risk to consumers. This practice unnecessarily limits food choices to allergic consumers.

Finally, the EUMS wish to note that the terms of reference of the request from CCFH to FAO/WHO *for scientific advice on risk assessment of food allergens* also comprises the setting of threshold levels for the “priority allergens” below which the majority of allergic consumers would not suffer an adverse reaction. The allergens considered as priority correspond to the food and ingredients known to cause hypersensitivity listed in point 4.2.1.4 of the General Standard for Labelling of Prepackaged Foods, with the exception of sulphites. In this regard, the EUMS would like to note that the discussion paper on allergen labelling (under Agenda Item 8) to be discussed at the 45<sup>th</sup> session of CCFL recommends to request a scientific advice from FAO/WHO to the list of foods and ingredients in section 4.2.1.4. and in particular, on whether there are new foods and ingredients that should be added to the list.