

Jessica Burek
Food Information and Labelling
Food Data Standards and Sustainability Directorate.
Department for Environment, Food and Rural Affairs (DEFRA)
SE quarter 2nd floor, Seacole, 2 Marsham Street, London SW1P 4DF

6th April 2023

Dear Jessica,

Thank you for the opportunity to provide comments on these letters ahead of the CCFL47 meeting. Please see below comments from IFST relating to the proposed draft revision to the GSLPF and whether to provide any advice to CCFH to ensure consistency with the Code of Practice on Allergen Management for Food Business Operators.

- We agree that Codex should seek the view of CCMAS on allergen measurement methods before deciding on the approach to setting thresholds. Any limit must be verifiable and enforceable.
- Codex would need to strengthen their guidance to Food Business Operators. (i.e. the guidance should stress that FBOs have a duty to control cross-contamination risks, PAL should only be used as a last resort if risks cannot be managed to an acceptable level, reference doses are not to be used as an ingredient specification compliance limit)
- How will guidance / mandatory limits be updated in a timely fashion as the science evolves?
- More clarity is needed on the use of national reference doses for allergens where there are no agreed Codex limits. Specific areas for clarification include:
 - Is the science sufficiently robust / have enough studies been conducted to confirm the use of thresholds?
 - Will these be set using 1% or 5% level of confidence?
 - Will thresholds be mandatory, or guidelines?
 - How will these be communicated to FBOs?
 - How will rules apply to import and export?

We also have some comments which are more specific to Defra and the UK implementation should these guidelines progress.

The UK should not make changes to allergen labelling without full consultation with allergenic consumers.

Once the Codex allergen guidelines are published, irrespective of UK adoption, Defra/FSA would need to communicate:

- Firm guidance to FBOs (particularly hospitality) – PAL is a last-resort, they have obligation to manage allergen cross-contamination risk, Codex values should not be used as a specification compliance limit.

- Guidance to UK FBOs – UK law takes primacy over Codex guidance (e.g. “NUTS” vs “PECANS” as a mandatory descriptor) this could be confusing to FBOs if they try to use both on the same product label.
- Defra/FSA will need to communicate their policy if there are any UK national reference values (i.e. be very clear that these are not being used or are not in place depending on the case)
- Guidance would need to be prepared for UK FBOs on potential changes to export labels for allergens – this would require expert local advice.

We hope that these comments are useful to the consultation.

Best regards

A handwritten signature in blue ink that reads "S French". The signature is stylized and cursive.

Stephen French, Ph.D
Scientific Policy Director, Institute of Food Science & Technology.

