

**EFA statement at the Codex Committee on Food Hygiene meeting in the context of the 43<sup>rd</sup> Session of the Codex Alimentarius Commission**

As representatives of patient consumers with food allergies in Europe, the European Federation of Allergy and Airways Diseases Patients' Associations welcomes and appreciates the work of the Codex Committee on Food Hygiene on food allergens, specifically the development of a Code of Practice on Food Allergen Management for Food Business Operators.

One of the major issues for consumers in this context is the lack of guidance for FBOs on how to apply a proper, meaningful risk assessment for unintended allergen presence that is relevant to the health of consumers with food allergies.

Under current circumstances, the FBO behavior can be **overprotective**, as a result of an unnecessary use of Precautionary Allergen Labelling (PAL), which limits food choices for consumers with food allergies; or it can be **unaware**, especially when PAL is not applied but unintended allergen presence is still possible, which leads to a health risk via a subsequent allergic reaction.

However, as patient representatives, we cannot support the decision of excluding all text passages related to PAL, as we pointed out in the provided comments. We suggest to include both "quantitative risk assessment" as well as "Precautionary Allergen Labelling" in the text, as a way to emphasize the importance of the two terms in the discussion. Furthermore, the inclusion of the references to quantitative risk assessment and PAL will facilitate the work on potential updates in the future, in anticipation of the results from other relevant procedures. We appreciate the consideration of the Codex Committee on Food Hygiene of aspects that are crucial to those affected by food allergies.

EFA considers the work of Codex Alimentarius Commission on food allergens as paramount in paving the way towards policies that better protect consumers with food allergies.