



# Overview of ongoing EU activities regarding food labelling and food contact materials with relevance for coeliac societies

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# Precautionary Allergen Labelling

The European Court Auditors' Special Report published on 25/11/2024: *"Food labelling in the EU – Consumers can get lost in the maze of labels"*

The Commission committed to harmonise rules on the provision of information on possible unintentional presence of allergens by end 2027

# Precautionary Allergen Labelling

*Address the gaps in the EU legal framework for food labelling: **allergen labelling***

- Implementing act on precautionary allergen labelling (PAL)
- Legal obligation in FIC Regulation
- Adoption of Codex guidelines on PAL in July 2026

# Precautionary Allergen Labelling

- *Announcement of the forthcoming initiative*
  - 'Have your say' webpage updated
- *Steps to be followed for the implementing act:*
  - EFSA mandate (request for areas to work)
  - Working Group meetings
  - Launch of procedures for adoption of an implementing act



# Food Contact Materials (FCM) Legislation

- **Regulation (EU) No 1935/2004** on food contact materials and articles
  - framework legislation – adopted by Council and Parliament
  - applies to all food contact materials
  - basic requirements and procedures including role of the European Food Safety Authority ('EFSA')

**Important requirement:** *'Food contact materials shall not transfer their constituents to food in amounts that could endanger human health'*

- **Regulation (EU) No 1935/2004** → Commission implementing legislation on specific materials
  - Regulation (EU) No 10/2011 on plastic materials
  - Also: recycled plastic, ceramics, regenerated cellulose, and active and intelligent materials are subject to EU legislation – as are some specific substances (BPA, VCM, nitrosamines)
  - All other materials are subject to national legislation!

# Possible occurrence of gluten in FCM

- *As stated before: food contact materials shall not release constituents in amounts that could endanger human health – this is also relevant for allergens*
- *When relevant, the risks of allergens, including gluten, must be considered in safety assessment of FCMs*
- *EFSA identified gluten migration from biodegradable food contact materials as an emerging risk*
- *For plastic FCM, EFSA assesses the safety of migrating constituents from FCMs into food, which includes an assessment of allergenicity. So far, no starting material containing gluten has been authorised for the manufacture of plastic FCM.*
- *Materials such as paper and board are not subject to specific EU legislation but may be subject to national rules. Still, such materials shall not release constituents in amounts that could endanger human health.*
- *Food contact legislation is presently being revised with the objective to harmonise the rules applicable to all materials. Allergen risks will be considered as an element in the revision process. Input from AOECs in forthcoming consultations is very welcome.*

# Thank you for your attention !



[https://europa.eu/youreurope/business/product-requirements/food-labelling/general-rules/index\\_en.htm](https://europa.eu/youreurope/business/product-requirements/food-labelling/general-rules/index_en.htm)



[https://food.ec.europa.eu/food-safety/chemical-safety/food-contact-materials\\_en](https://food.ec.europa.eu/food-safety/chemical-safety/food-contact-materials_en)



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