Contact:
Laura Wonser, Senior Executive Assistant
GFSF/GIC Group
www.gicgroup.com
laura.wonser@gicgroup.com
GFSF: www.globalfoodsafetyforum.org

GFSF FOCUS 2026

A New Stage in Food Safety

Food Safety in Practice: What Recent Standards Mean for Food and Agricultural Businesses

Content

- Food Safety in Practice: What Recent Standards Mean for Food and Agricultural Businesses

By: Yushan Cao

Food Safety in Practice: What Recent Standards Mean for Food and Agricultural Businesses

By: Yushan Cao

Unsafe food continues to impose a substantial public-health burden. In June 2026, the World Health Organization published updated estimates putting the annual toll of unsafe food at approximately 866 million illnesses and 1.5 million deaths. Drawing on evidence covering 194 countries and 42 hazards over 2000–2021, the assessment found that children under five accounted for nearly one-third of cases. [1] These figures show the scale of the food safety problem, but reducing that burden ultimately depends on how food-safety risks are identified, controlled and communicated throughout the food supply chain.

Three recent developments address these practical elements of food-safety management. Codex's guidance on precautionary allergen labelling addresses when unintended allergen exposure warrants a warning. The EU's amended Listeria criteria address the safety of certain ready-to-eat foods throughout their shelf life. FDA's traceability readiness work examines whether businesses can retrieve and connect supply-chain records during a food-safety incident. These developments concern different risks and regulatory settings, but each links a specific safety decision to the information needed to support it.

Across all three developments, the common issue is how businesses connect food-safety decisions to reliable evidence across production and supply-chain operations. Allergen warnings depend on the risk remaining after preventive controls; shelf-life decisions depend on evidence about microbial growth; and traceability depends on records that remain usable as products move between businesses. Together, the developments show why effective food-safety controls must be supported by information that can justify the decisions made around them.

Codex: linking consumer warnings to producer decisions

At its forty-ninth session in Geneva in July 2026, the Codex Alimentarius Commission agreed to adopt guidelines on precautionary allergen labelling, now included in the General Standard for the Labelling of Pre-packaged Foods. Developed through the joint FAO/WHO food standards system, the guidance addresses warnings such as "may contain" that concern unintended allergen presence, rather than allergens deliberately included as ingredients. [2] [3]

Consumers with food allergies need precautionary labels that communicate risk consistently. Statements such as "may contain peanuts" warn of possible unintended allergen presence, but their usefulness depends on how producers decide to apply them. Codex explains that excessive use can unnecessarily limit consumers 'food choices, while loss of confidence in these warnings may lead consumers to ignore them. The new guidance seeks to address this problem by establishing a common basis for deciding when a precautionary warning is justified: an assessment of the allergen risk that remains after measures to prevent or reduce cross-contact. This approach aims to give consumers more dependable information by grounding producers 'labelling decisions in the risks associated with the food. [2]

According to the guidance, producers should first take steps to prevent allergens from unintentionally entering a food. These steps may include separating ingredients that contain allergens and cleaning

shared equipment. Businesses should then assess whether allergens could still enter the product despite these controls. The assessment starts with information about ingredients, suppliers and production processes. Where that information is insufficient to determine whether a warning is needed, businesses should also assess how much of the allergen could remain in the food and how much a consumer could ingest.

The guidance links the decision to use a warning to a defined threshold, known as an "action level." This threshold accounts for both the reference dose for the allergen, the amount of allergen protein used as a benchmark in the risk assessment, and the quantity of food expected to be eaten on one occasion. A larger portion can expose a consumer to more allergen even when its concentration in the food is low. If unintended allergen levels remain above the relevant threshold after control measures, the guidance calls for precautionary labelling. At or below that threshold, it advises against using the warning. [3]

The agricultural connection lies upstream. Codex's companion allergen-management code identifies risks arising from shared transport containers, inadequate separation during storage, production scheduling, ineffective cleaning and incomplete supplier information. Its scope includes primary production as well as manufacturing and distribution. These practices are addressed in Codex's existing allergen-management framework and help explain what must sit behind a credible precautionary labelling decision. [4] If unintended allergens can enter before an ingredient reaches the manufacturer, then the manufacturer's assessment depends partly on its suppliers 'practices and information. For agricultural companies handling relevant commodities, the issue is therefore not confined to the final package.

The broader standards implication is greater scope for a shared, risk-based approach to warnings across markets. Codex texts are voluntary and often inform national legislation; they do not automatically override domestic requirements. [5] How far the new guidance produces convergence will depend on national uptake. Yet its immediate value is a clearer international benchmark for connecting allergen management with consumer communication. Businesses operating across markets will still need to check the requirements of individual destination markets.

European Union: evidence determines the applicable Listeria criterion

The European Union has extended a stricter *Listeria monocytogenes* criterion to certain ready-to-eat foods throughout their shelf life. The amendment, applicable from 1 July 2026, concerns ready-to-eat foods that can support the growth of *Listeria monocytogenes*. Ready-to-eat foods are intended to be eaten without further cooking or another treatment that would eliminate the bacteria. For these products, preventing contamination and controlling bacterial growth during storage are essential to protecting consumers.[6]

The applicable limit depends on the producer's evidence about bacterial growth. Producers that can demonstrate, to the satisfaction of the competent authority, that Listeria will not exceed 100 colony-forming units per gram throughout the product's shelf life may use that limit. Colony-forming units, or CFU, measure viable bacteria in a sample. If producers cannot provide that evidence, Listeria must not be detected in a 25-gram sample. Previously, this non-detection requirement applied before the food left the producer's immediate control. It now also applies while the product is on the market, including at wholesale and retail, throughout its shelf life. [7]

Producers need evidence that supports the shelf life and storage conditions assigned to their products. This can include studies that track bacterial levels during storage or laboratory challenge tests that examine how Listeria behaves when deliberately introduced into a food sample. The European Commission provides technical guidance on these methods. The findings can inform decisions about product formulation, refrigeration requirements and how long a product can remain on sale. [7]

This makes the connection to business decisions concrete. But the validity of that shelf-life assessment also depends on the conditions the product encounters after leaving the factory. Distributors and retailers therefore play a role in maintaining the storage and handling conditions on which the producer's evidence relies. Storage temperatures and handling practices can affect bacterial growth after a product leaves the factory. The practical implication is that a producer's shelf-life evidence needs to be matched by appropriate handling throughout distribution and sale. For the affected businesses, laboratory assessment, production controls and cold-chain management therefore support the same objective: keeping the food within the applicable safety limit until the end of its shelf life.

United States: food traceability moves from rules to practical testing

In June 2026, the U.S. Food and Drug Administration (FDA) published the results of exercises testing whether food companies could meet the practical requirements of the Food Traceability Rule. The exercises did not introduce new requirements. Instead, they tested how well companies could use their existing records to respond to an FDA traceability request. Most participating firms were able to provide the requested information within 24 hours, but the exercises also identified gaps in some of the data needed to trace products across the supply chain. [8]

The Food Traceability Rule applies to certain higher-risk foods on FDA's Food Traceability List, including products such as certain fresh produce, seafood, shell eggs, soft cheeses and nut butters. Businesses that manufacture, process, pack or hold covered foods may need to keep additional records showing how a product moves through the supply chain. These records connect important events, such as initial packing, shipping, receiving and processing, with key information about the product and its traceability lot. If FDA investigates a food-safety incident, this information is intended to help identify affected products and remove them from the market more quickly. [9]

The rule can also apply to foreign companies that produce or handle covered foods for the U.S. market. For foreign suppliers, including Chinese companies serving the U.S. market, an important first question is therefore whether their products appear on the Food Traceability List and whether their activities fall within the rule or an exemption. [9]

The 2026 exercises highlight an important practical issue for companies preparing for the rule: traceability depends on information moving correctly between trading partners. A supplier may have complete internal records, and its U.S. customer may also have a functioning traceability system, but the traceability chain can still break if the product, lot or shipment information recorded by the two companies cannot be matched. FDA found that companies with stronger results had generally coordinated with their supply-chain partners in advance. No particular technology or traceability system was identified as the main reason for success.[8]

For companies, this means preparation is not simply an IT or software project. In practice, preparation may involve checking what information businesses receive from suppliers, what they provide to customers, whether trading partners interpret that information consistently, and whether the required records can be retrieved quickly. For exporters, this may also require coordination with U.S. importers, distributors and customers rather than maintaining records only for internal use.

Companies still have time to prepare. The original compliance date was January 20, 2026. FDA later proposed extending it to July 20, 2028, and Congress directed FDA not to enforce the rule before July 20, 2028. FDA has stated that it intends to follow that direction. The additional time is intended in part to allow businesses to coordinate traceability systems and information across their supply chains. [9]

From compliance requirements to evidence-based decisions

Taken together, these developments point to a common feature of modern food-safety management: controls increasingly need to be supported by information that can justify the decisions made around them. Under the Codex guidance, evidence about residual allergen risk informs whether a precautionary warning is warranted. Under the EU's amended Listeria criteria, evidence about microbial growth determines which safety criterion applies throughout a product's shelf life. In the United States, traceability records need to remain connected across businesses if they are to support a rapid response when a food-safety problem occurs.

For food and agricultural businesses, this makes the quality and usability of information increasingly important alongside the controls themselves. Laboratory results, supplier information, production records and traceability data serve different purposes, but each may need to remain reliable as products move from primary production through processing, distribution and sale. A control applied at one stage can depend on information generated elsewhere in the chain, while a decision made by one business may depend on conditions maintained by another.

The three developments also show that implementation is not uniform across markets. Codex provides an international benchmark whose effect will depend on national adoption; the EU has established a legally applicable microbiological criterion; and the U.S. traceability requirements remain subject to an extended implementation timeline. Businesses operating across borders therefore face both a common food-safety challenge and different regulatory pathways for addressing it. Understanding those differences, while strengthening the evidence that connects decisions across the supply chain, will be central to turning new standards and regulatory requirements into effective food-safety practice.

Sources

Official sources checked September 8, 2026. Citation numbers in the article and entries below link directly to the relevant source.

[1] WHO. Updated global foodborne disease estimates, news release, June 4, 2026.

[2] FAO/WHO Codex. "CAC49 / Groundbreaking guidelines set to fundamentally change food allergen labelling," July 7, 2026.

[3] Codex. General Standard for the Labelling of Pre-packaged Foods, CXS 1-1985, 2026 edition. Annex on precautionary allergen labelling, sections 1–5.

[4] Codex. Code of Practice on Food Allergen Management for Food Business Operators, CXC 80-2020, amended 2026. Introduction and scope.

[5] FAO/WHO Codex. “About Codex Alimentarius.” Status and purpose of international standards.

[6] European Commission. Regulation (EU) 2024/2895, November 20, 2024. Recitals, Article 2 and Annex; applicable July 1, 2026.

[7] European Commission. “Microbiological criteria.” Listeria monocytogenes technical resources on shelf-life studies.

[8] FDA. “FDA Releases Report on Traceability Readiness Tabletop Exercises and Updated FAQS,” June 10, 2026.

[9] FDA. “FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods.” Scope, key features and Compliance Date section.