

Food

Food Standards Agency July 2006.

Voluntary: Guidance on Allergen Management and Consumer Information.

Deliberate inclusion of ingredients which contain allergens is already regulated and packaging should be labelled. Unintentional contamination is not regulated. This paper provides voluntary guidance on the latter.

There is general recognition that the overuse of warning labels about the possible presence of allergens restricts consumer choice and devalues the impact of those warnings. Recent regulation [Directive 2003/89/EC] made it clear that allergens that were intentionally added to a food product, e.g. egg, or milk, should be disclosed on the package label.

It is estimated that the proportion of the population with true food allergy is 1-2% of adults and about 5-8% of children, which equates to about 1.5 million people in the UK. Labelling regulations could have a significant impact.

There was no regulation for the situation where allergens are present as a result of cross-contamination of foods somewhere in the food supply chain.

The guidance identifies 12 food stuffs with which inadvertent contact should be avoided. Where available, the proportion of the population affected is indicated in parentheses. These are: cereals containing gluten (1%), crustaceans, fish, eggs, peanuts (1-2%), soy, cow's milk (2-7% of children under 1), nuts, celery and celeriac, mustard, sesame, sulphur dioxide,

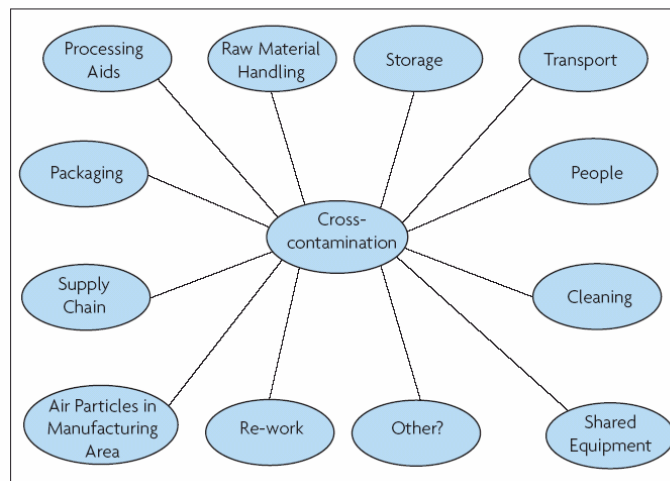
The degree of contamination required to induce an allergic reaction is not generally known. The trigger for the labelling of a product would therefore be qualitative. Sometimes as little as one milligram of allergen is sufficient to trigger a reaction.

Agreed principle:

Advisory labelling should only be used when, following a thorough risk assessment, there is a demonstrable and significant risk of allergen cross-contamination.

Potential sources of cross-contamination have been summarised as follows:

Figure 2: Potential sources of cross-contamination



Detailed guidance is provided on how to minimise the effects of these potential sources of contamination.

If any of these sources gives rise to a probable contamination then the product should be labelled appropriately. Appropriate labels are indicated as "May Contain" or "Not Suitable for Someone with X Allergy" and "May contain other Nuts" when nuts are already included in the ingredients list.

Comment

It seems likely that a food containing allergens but which is not so labelled, would be regarded as defective. The guidance explains a systematic approach to forming a reasonable judgement about the probability of contamination.

Where a food-stuff is heavily refined, the allergen could be effectively eliminated. In this case there would be no need for labelling.

