

# Allergen management and consumer information (“May Contain” Guidance)

Food and Drink Innovation Network  
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# What I will be discussing

- The need for guidance on allergen control and consumer information
- How the guidance was developed
- The key principles in the guidance
- What to put on the label
- Some worked examples



# What I will NOT be discussing in any detail

- 'free-from' labelling
- allergen thresholds
- analytical methods



# Why is Allergen Advisory Labelling Guidance Needed?

## Background

- Anaphylaxis Campaign Report - *'May Contain' Labelling - The Consumer's Perspective*
- Stakeholder meetings
- Focus Group Research (teenagers)



# Why is Allergen Advisory Labelling Guidance Needed?

## Conclusions

- Confusion - Do different words reflect different levels of risk?
- Overuse:
  - Devaluation of impact
  - Restriction in choice - **Choice:** 56% of non-nut items not available to nut allergic people  
**Time:** 39% longer  
**Cost:** 11% more
- Advisory labelling often difficult to find and to read



# Agency Aims

Key aim for the Agency in our 2005-10 Strategic Plan is:

- “ to enable consumers to make informed choices.”

There is a specific target in the Plan to:

“develop guidance on appropriate and proportionate use of label statements to warn allergic consumers of the risk of contamination with nuts or sesame seeds. In doing this, we will build on existing guidance and will ensure that the guidance is also relevant to other allergens.”



# Development of Allergen Management and Consumer Information Guidance

## First Steps:

- Initial stakeholder meetings
- Amalgamate existing industry guidance
- Form a Drafting Group of stakeholders:
  - including FDF, BRC, Anaphylaxis Campaign, LACORS, Small Business Service
- Issue draft guidance for public consultation  
(Sep - Dec 05)



# Development of Allergen Management and Consumer Information Guidance

## Second stage:

- Review responses to consultation and revise guidance
- Produce RIA, with input from small businesses
- Publish final guidance - July 2006
- Produce summary leaflet for small and micro businesses
- Publicise the new guidance once it is published



# Key Aims of Guidance

- **Consistent use of advisory labelling**
  - Food manufacturers and retailers have advice on allergen management so that advisory labelling is only used when a real risk remains
- **Consumers understand advisory labelling**
  - Food manufacturers and retailers use consistent wording to communicate the risks
  - Consumers educated on advisory labelling so they understand the risks involved.
- **Help enforcement officers when advising businesses**
  - Encourage allergen management best practice



# Main Approach

Encourage food manufacturers and retailers to **think about risks** of allergen cross-contamination - where they occur and whether they can be reduced or eliminated

1. RISK ASSESSMENT
2. RISK MANAGEMENT
3. RISK COMMUNICATION

**Only use advisory labelling after a thorough risk assessment**



# What to put on the advisory label?

- Keep as simple as possible
- Needs to be easy to find, easy to read and easy to understand
- Two phrases recommended
  - ‘May Contain X’
  - ‘Not suitable for someone with X allergy’



# Which allergens/which foods?

- Guidance refers to EU list of allergens requiring declaration when used as deliberate ingredients
- Guidance focuses on foods sold pre-packed



# Allergen Advisory labelling decision tree

## Step 1 – Assess risk from intentional presence

Is the food manufactured from intentional ingredients, food additives, or processing aids that are, or derived from, or contain allergenic foods of public health importance (Appendix I)?

**YES**

(Label as necessary. Go to step 7)

**NO**

(Go to Step 2)



## Step 2 – Assess risk from unintentional presence

What is the likelihood, under normal operating conditions, of cross-contamination of the food by specified allergens (Appendix I)?

**PROBABLE**

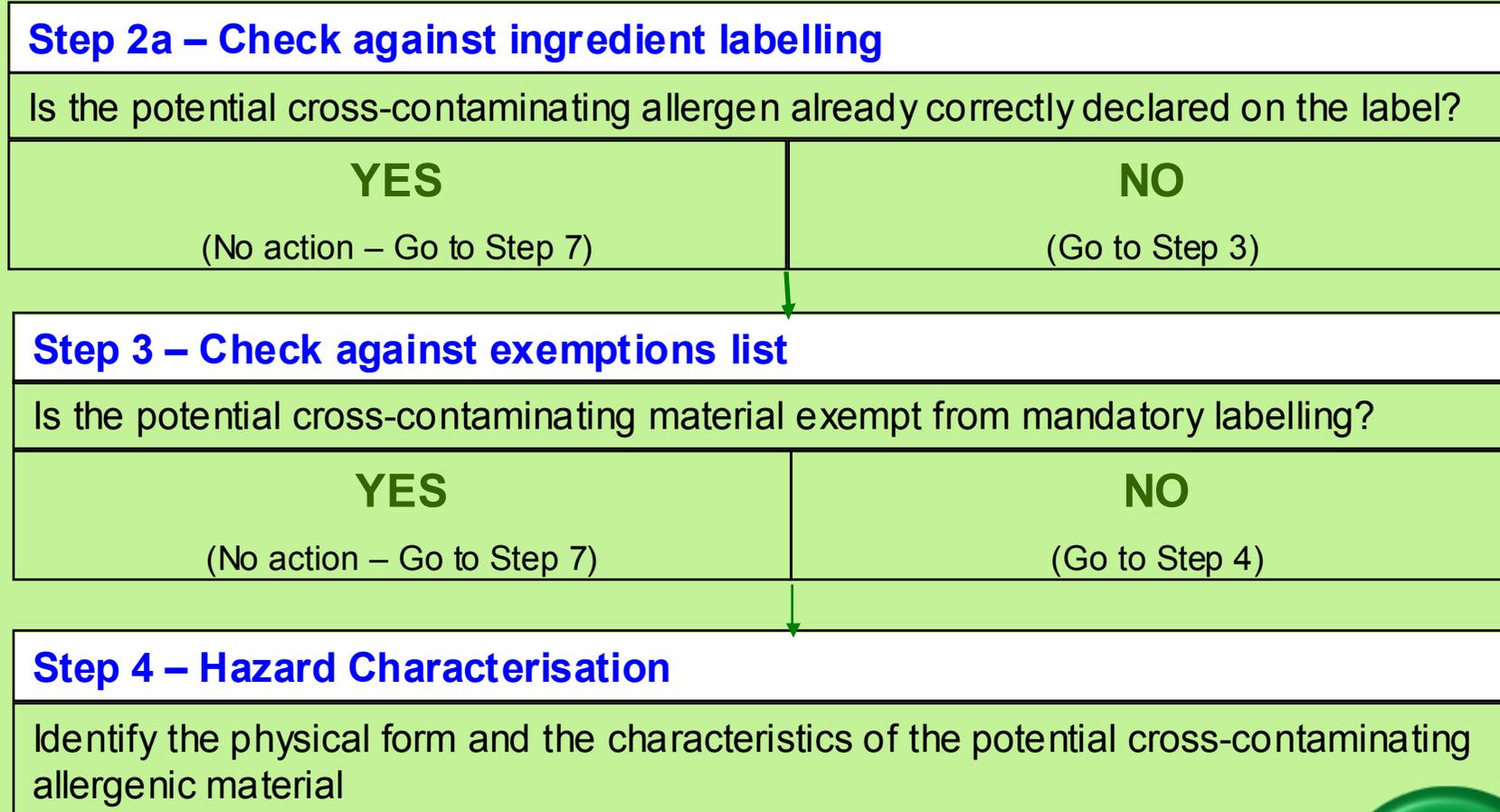
(Go to step 2a)

**REMOTE**

(No action – Go to Step 7)



# Allergen Advisory labelling decision tree



# Allergen Advisory labelling decision tree

## Step 5 – Risk Management of Unintentional Presence

Can the identified risk of cross-contamination be managed?

**YES**

(Go to step 7)

**NO**

(Go to Step 6)

## Step 6 – Risk Communication

Include warning on label

## Step 7 – Check other relevant allergens

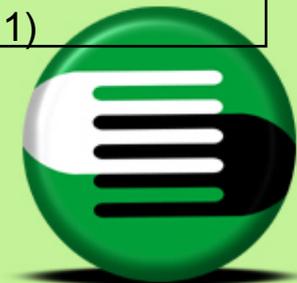
Have all relevant allergens been considered?

**YES**

(No Action)

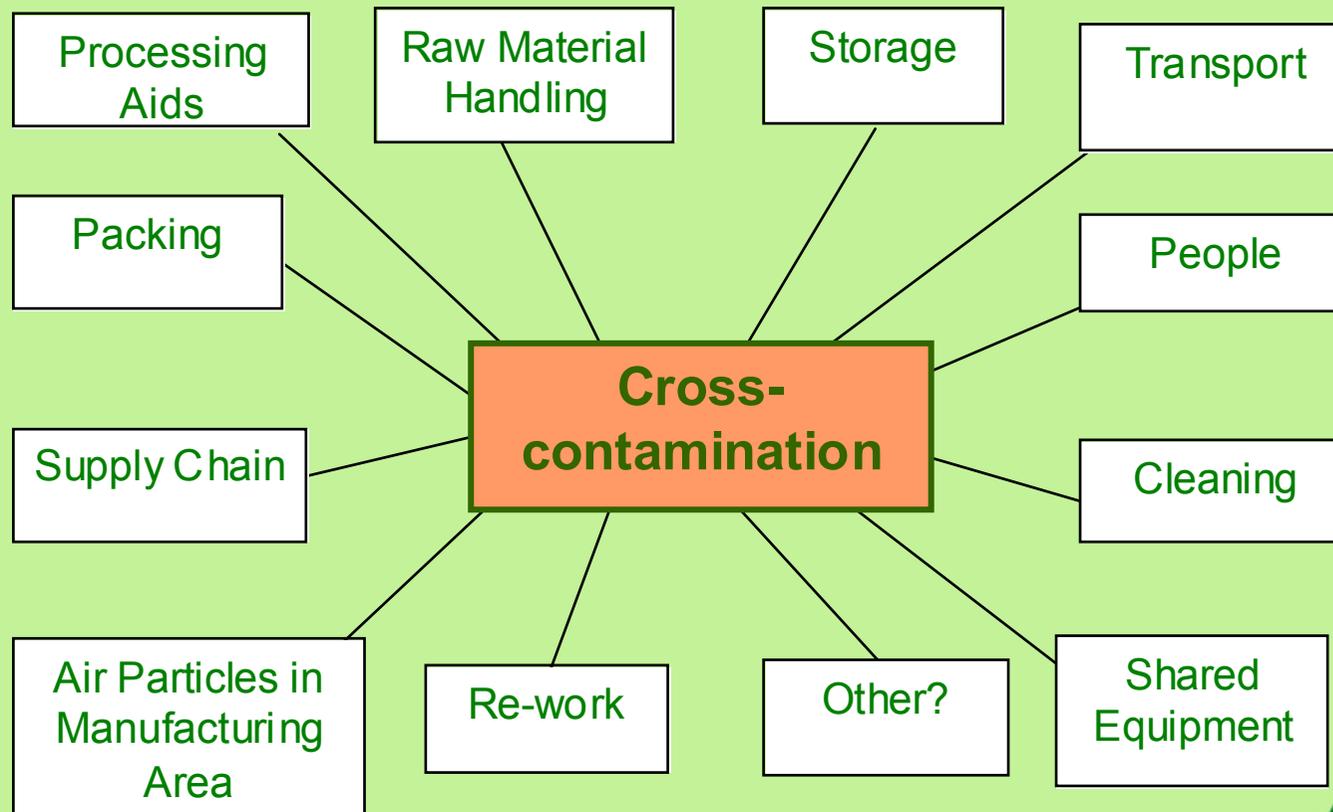
**NO**

(Go back to Step 1)



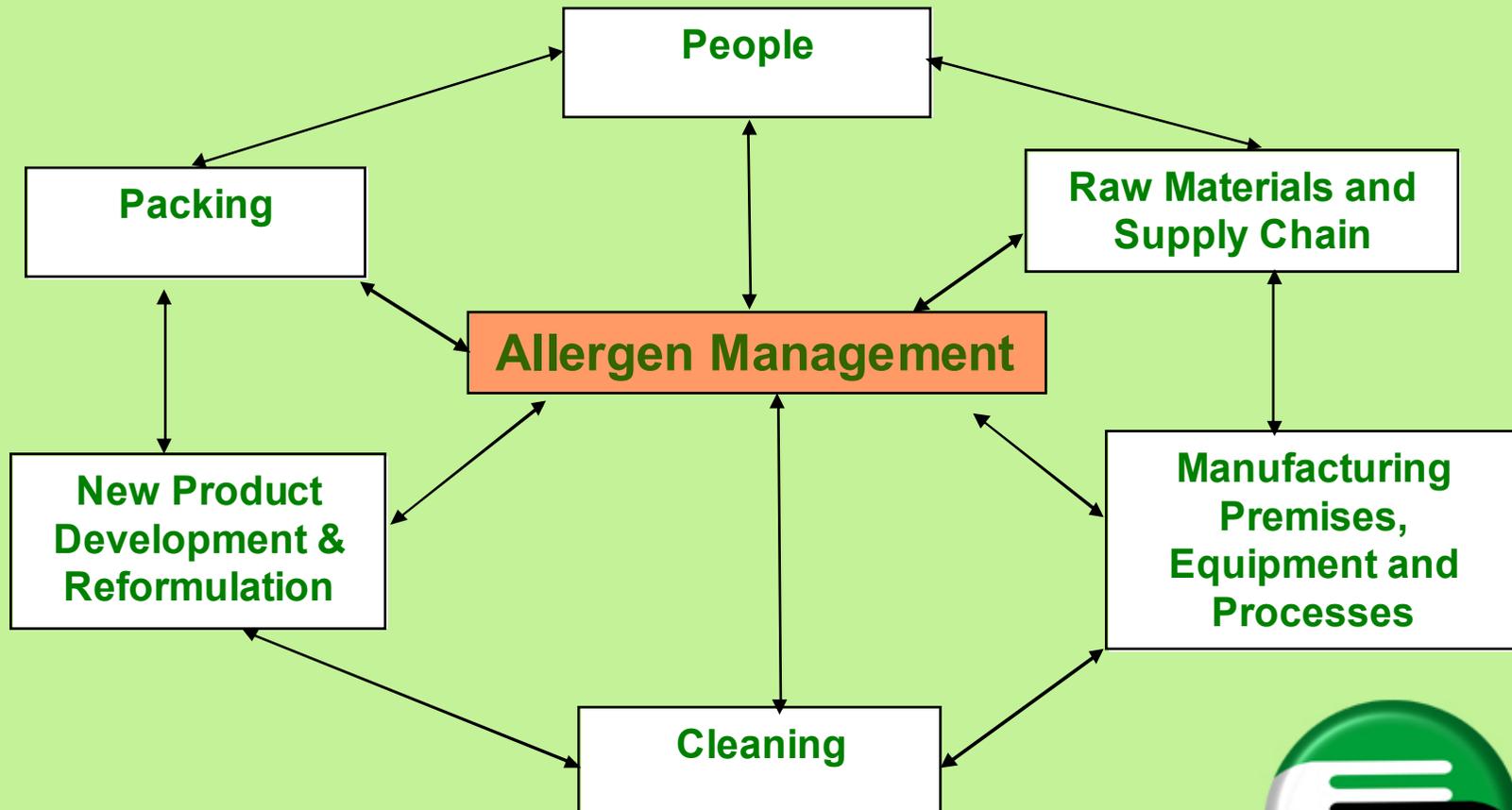
# Sources of cross-contamination

## Potential sources of cross-contamination



# Sources of cross-contamination

## Key Areas for Consideration



# Allergen advisory labelling decision tree - worked example 1

Step	Example
	<b>Production of oven chips with sunflower oil that was refined in a premises also refining peanut oil</b>
1	Oven chips contain refined sunflower oil as a deliberate ingredient. There are no deliberately added allergenic foods requiring labelling
2	The supplier has declared that sunflower oil was refined in a food production area that also refines peanut oil. There is a probable risk of cross-contamination under normal operating conditions between the refined sunflower oil and refined peanut oil as they are made using shared equipment.
2a	Peanut is not already declared in the ingredients list
3	Refined peanut oil is not exempt from allergen labelling when present as an intentionally added ingredient
4	The potentially cross-contaminating allergenic material is a highly refined oil with little or no protein present.
5	Analysis confirms batches of peanut oil consistently do not contain peanut protein.
6	There is <b>no need for an advisory warning label for peanut</b> because the only probable risk of peanut exposure is highly refined peanut oil with little or no protein present.



# Allergen Advisory labelling decision tree - worked example 2

Step	Example
	<b>Production of tea cakes in the same bakery as burger buns with sesame seeds</b>
1	Tea cakes do not contain any sesame seeds
2	Teacakes are made using the same tins and oven as burger buns with sesame seeds. There is a probable risk of cross-contamination under normal operating conditions.
2a	Sesame is not already declared in the ingredients list
3	Sesame seeds are not exempt from allergen labelling when present as an intentionally added ingredient
4	Sesame seeds are small particles, which will be unevenly distributed and cross-contamination is difficult to manage.
5	Although teacake production is scheduled first, followed by sesame seed burger buns, followed by a thorough clean at the end of the day a visual inspection of teacake batches show that teacakes sometimes contain sesame seeds.
6	There is <b>a need for an advisory warning label for sesame</b> because GMP measures in place cannot control cross-contamination and are insufficient to manage the identified risk.



# What the Guidance doesn't do

## No allergen thresholds/management levels

- *some* threshold information included in first draft of guidance that was issued for public consultation but later removed, because:
  - no consensus on clinical thresholds for allergens
  - lack of detection methods for certain allergens
  - lack of standard reference materials
- aim to produce revised guidance in due course with threshold information:
  - March 2006 research call



# How to get hold of the guidance?

- Available on FSA website at:  
**[food.gov.uk/foodindustry/guidancenotes/](http://food.gov.uk/foodindustry/guidancenotes/)**
- Printed copies from Mailing House  
email: **[foodstandards@ecgroup.uk.com](mailto:foodstandards@ecgroup.uk.com)**  
telephone: **0845 606 0667**



# Free From

- **Lack of need to use allergen advisory warnings does not equal 'free from'**
- any 'free from' claims must be based on specific rigorous controls to ensure they are valid
- 'free from' claims are outside the new health and nutrition claims legislation
- if lists of foods free from particular allergens are provided, they should be regularly reviewed/updated
- no established legal standards for residual levels of allergens in foods labelled 'free from'
- Codex standards for 'gluten free'



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