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The Rise and Rise of FreeFrom

So, who eats freefrom food?

The medically diagnosed

- Food allergy sufferers
- Coeliacs & those who are gluten intolerant
- Those suffering from Irritable Bowel syndrome and other digestive conditions

Who else eats freefrom food?

- Self diagnosed food intolerants
- Those who choose to eat 'freefrom' even though they do not need to do so because they see it as 'healthier' and more ethically acceptable.

- The numbers in all of these groups has been growing steadily – but starting from a very low base – since the 1980s
- How has ‘freefrom’ developed to fill their need?

2005–2014

1. Growing interest from main stream international food industry:

Youngs produced the first gluten-free fish fingers in 2012

2. Major step forward in quality of products:

The Brits sorted out bread, the Italians sorted out pasta and the Belgians sorted out soya milks!



- 3.** In the UK – serious engagement on the part of the supermarkets with own-label freefrom brands
- 4.** Growth of online & home delivery shopping (independent of freefrom) made buying freefrom on line much more accessible and acceptable.
- 5.** Although many prices remain too high, they started to come more in line with mainstream food products.
- 6.** Better distribution has led to increased availability – also allowing for increased take up.

2014

We have reached the position where the improved quality and availability of freefrom food means that it is relatively easy for those who both need and choose to eat freefrom to do so.

*Especially important for those who do not **need** to eat freefrom and who are therefore much more likely to stick with freefrom if it is relatively easy for them to do so.*

Regulation – where was it?

Allergy has always been covered under general food law:

- Food Safety Act 1990
- Food Safety Regulations 1995
- Consumer Protection Act 1987

e.g. A purveyor of food must be able to give accurate information about their food to a customer who asks, and could be seen as selling a 'defective' products if accurate information, including information about allergens, was not provided. However, that information could be to say that they do not know what allergens are in their foods.

European Directives

2003/89/EC and 2006/142/EC

- EU directives in 2003 & 2006 required that major allergens should be listed and ‘clearly distinguished’ from other ingredients – or –
- If allergens were not to be listed then the product should state ‘contains x’
- These requirements applied to packaged foods but not to food sold loose or in the food service sector.
- In 2011 it was decided that these rules should be revised and it is this revision that is to come into effect in December this year.

New regulations as from December 2014

- While the new FIRs have been a major pain for industry both in terms of the cost and the amount of work they have involved, they have not made any major changes.
- Food service entirely different but we will come to that tomorrow.
- Far more important for the manufacturers were the gluten free regulations which came into effect in 2012.

Gluten free

- In 2009 (Commission Regulation (EC) No. 41/2009) the EU decided that it would be 'safe' for coeliacs to consume products which contained less than 20 parts per million of gluten.
- Although there are gluten sensitives who believe, probably rightly, that they react to lower levels.
- These regulations came into force in January 2012.
- This has enabled spectacular growth in the gluten free market.

Other allergens – Action Levels

- There has been a massive European research project over last 10 years to establish similar ‘thresholds’ for other allergens – dairy, nuts, soya, celery etc
- Will establishing levels thresholds for other allergens have as dramatic effect on dairy/nut/soya etc free foods and the establishment of the 20ppm for gluten had gluten free foods?

'May contain' defensive labelling

- Action levels would also dramatically reduce the need for defensive 'may contain'
- Sadly, the December changes have, again, totally failed to address the issue of contamination and the resultant 'defensive' labeling.
- Allergic consumers continue to call for some sort of traffic lighting which would indicate the level of contamination risk that a product presents to allow them to make an informed judgement as to whether or not they should risk eating it.

So... what is holding freefrom back?

1. Poor distribution

The desire to eat freefrom is there – but the product is all too often not.

2. Price

A small price premium – up to 10 or even 15% – is seen as acceptable; 50–100–200% simply is not!

3. Nutritional profile

To genuinely improve the health of those who need it – and – to keep the ‘lifestyle’ freefrom-ers on board....

Freefrom needs to deliver the health benefits that they are looking for. All too often it does not.

The future...
the opportunities...

Health conditions that require a restricted diet continue to rise – fast...

- Food allergy/intolerance
- Coeliac disease/gluten sensitivity
- Irritable Bowel syndrome & related digestive disorders
- **Diabetes**
- **Obesity**

Obesity & Diabetes

- FreeFrom foods – especially gluten-free – already seen as helpful in weight control.
- If ‘freefrom’ can develop this aspect will massively expand its potential market.

Food service & eating out

- The 'freefrom' food market in food service is potentially huge and currently scarcely tapped.
- Great opportunity for manufacturers of ready made 'freefrom' foods to sell into food service.

Family catering

- Number of families with at least one member on some sort of restricted diet growing.
- Provided freefrom versions of ‘normal’ foods (pastas, breads, breakfast cereals etc) are as good as, and are not much more expensive than, normal foods whole family will eat ‘freefrom’.

Food to go

- Increasingly we eat on the move.
- If freefrom can increase the volume, quality and distribution of 'freefrom' food to go, it will tap into a lucrative market.

World wide

- Europe and North America first to develop medical conditions requiring restricted diets – food allergy/intolerances, diabetes – and the freefrom foods to ‘treat’ them.
- Allergy, coeliac disease/gluten sensitivity, diabetes and obesity all rapidly growing problems in India, Middle East, China, Africa and South America....

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