

Food Hypersensitivity Update June 2023

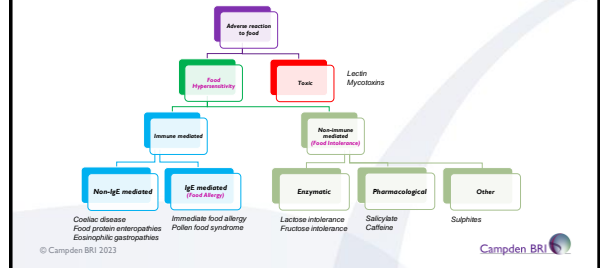
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1

Terminology Explained



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2

Food Allergy or Intolerance?

If you have a food allergy, intolerance, or coeliac disease – please speak to the staff about the ingredients in your food and drink before you order. Thank you.



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3

Agenda

- **Precautionary Allergen Labelling and Information**
 - FSA 'may contain' consultation findings and next steps
- **Quantitative Risk Assessment**
 - 'Action levels' and their use in precautionary labelling
- **Update to FSA Technical Guidance**
 - Published June 2023

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4

Precautionary Allergen Labelling (PAL) and Information

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5

FSA Consultation Findings

- Current advice and guidance for businesses on PAL is inadequate
- PAL should only be applied following a risk assessment and when the risk is unavoidable
- 'Not suitable for those with an allergy to [allergen]' is the preferred PAL statement wording
- Standardised supply chain information and setting of allergen 'thresholds' for PAL for prepacked food

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6

FSA Next Steps – September 2022 Board Meeting Paper

Priority Theme 1
Improving provision of information for consumers, priority focus on accuracy

Priority Theme 2
Achieving a step-change in knowledge, skills and food safety culture in the non-prepacked sector

Priority Theme 3
Improve the way PAL is applied and its effectiveness as a consumer information tool

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FSA Next Steps – But...

December 2022 Board Meeting:

- **Shift in focus due to several areas of work that place significant and unanticipated demands on key areas** (including: Genetic Technology (Precision Breeding) Bill; Borders Target Operating Model (Borders TOM); Retained EU Law (Reform and Revocation) Bill and Northern Ireland Protocol Bill now the Westminster Framework)
- **Core food hypersensitivity activities remain** (i.e. responding to allergen incidents, providing policy advice and guidance to industry and enforcement officers, working with external stakeholders and organisations to raise awareness about food hypersensitivity and ensure regulations are well understood)
- **Will pause and review much of the food hypersensitivity work:**
 - Precautionary Allergen Labelling remains a priority area – but longer timescale
 - Continue to build evidence base for future reform for provision of information for consumers – pause developing recommendations including potential changes to legislation in next 12-24 months
- Improving the provision of allergen training – level 1 only

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FSA Next Steps

Priority Theme 1

- Improving current practice: standardised 'good practice' resources
 - 'Ask about allergens' signage
 - Guidance on
 - conversations between consumers and staff
 - provision of written information on menus and in allergen matrix documents, including digital ordering systems within food premises
 - confirming to consumers that allergens have been correctly managed
- Improving current practice: work with online aggregators

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9

FSA Next Steps

Priority Theme 1:

- Future reform options: provision of information in the non-prepacked sector
 - review the effectiveness of different approaches for written information
 - research to better understand how different 'non-prepacked' business models operate
 - improve understanding of where FHS reactions occur in the non-prepacked sector
 - consider lessons from the introduction of 'prepacked for direct sale' (PPDS) labelling legislation

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10

FSA Next Steps

Priority Theme 2:

- Training for staff in the non-prepacked sector
 - building understanding and empathy amongst staff for people with FHS
 - understanding allergen management
 - the role of individuals in the food businesses
 - how to engage with people with FHS and what to do in an emergency
- Developing guidance resources
- Role of local authorities in supporting compliance and enforcement

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11

FSA Next Steps

Priority Theme 3:

- International review of allergen cleaning guidance – **completed by Campden BRI**
 - "Many SMEs face difficulties in assessing whether the risk of allergen cross-contact has been sufficiently controlled, because without routine testing, they do not know how effective control measures (cleaning in particular) are"
- Co-develop allergen cleaning guidance with industry
 - to support food businesses that do not conduct routine allergen testing to apply PAL more effectively

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12



13



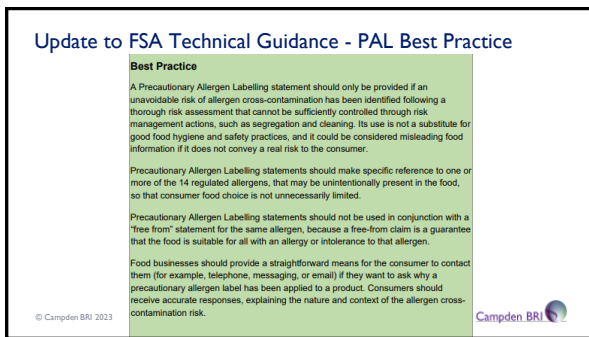
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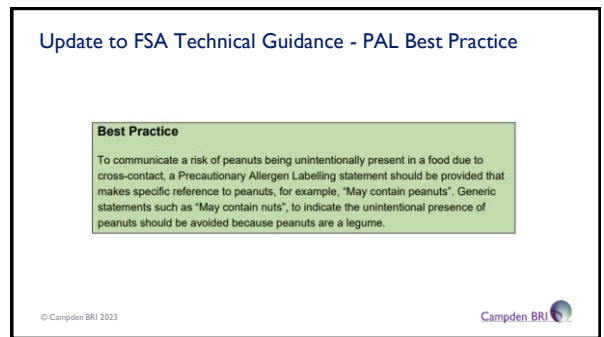
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16



17



18

Update to FSA Technical Guidance - NGCI Best Practice

- The rules surrounding use of the terms "gluten-free" and "very-low gluten" apply to all foods including non-prepacked foods such as those served in restaurants.
No other statements to describe the absence or reduced presence of gluten are permitted
- No Gluten containing ingredients (NGCI) statements can be misleading to consumers. "NGCI" statements have been used in menus when listing a group of food items to indicate they do not have gluten containing ingredients, when the food businesses cannot guarantee the foods are gluten-free

Best Practice

Avoid No Gluten Containing Ingredients statements, for example, "this menu has been designed for a non-gluten diet. It's a selection of dishes that do not contain gluten in their ingredients".

Instead, a "gluten-free" statement should be provided where strict controls ensure that food provided contain less than 20ppm of gluten.

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19

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20