

PROGRESS ON AGENCY PLAN TO HELP CONSUMERS WITH FOOD ALLERGIES AND INTOLERANCES

Executive Summary

1. The number of people with food allergy appears to be increasing with recent research showing that the number of children with peanut allergy has increased more than threefold in the last 12 years, from 1 in 200 to 1 in 55 (Tariq et al. (1996) and Hourihane et al. (2007)¹).
2. This paper is to update the Board on the progress made since the April 2006 Board meeting on the long-term action plan for helping food allergic consumers. The main activities are described in the paper, with supporting work summarised in the Annex. Many key stakeholders from the food industry, enforcement bodies and the consumer support organisations have been keen to work in partnership with the Agency to support these activities.
3. The Board is invited to:
 - **note** the substantial progress made since April 2006 Board meeting, and the further activities planned.

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¹ Tariq, SM et al. Cohort study of peanut and tree nut sensitisation by age 4 years. (1996) *British Medical Journal* **313** 514-517.

Hourihane, J et al. The impact of government advice to pregnant mothers regarding peanut avoidance on the prevalence of peanut allergy in United Kingdom children at school entry. (2007) *Journal of Allergy and Clinical Immunology*. **119** 1197-1202.

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Issue

1. The Board is invited to note the substantial progress that has been made on the Agency Plan to help consumers with food allergies and intolerances and the further work in progress. A tabular summary of the progress on the full range of initiatives is given in Annex I and the main activities are described below.

Strategic Aims

2. The Agency's aim is to develop appropriate policies and standards to help ensure safety and choice for food allergic and food intolerant consumers.

Background

3. Information on the prevalence of food allergy and intolerance and the current legislation was given in the last update paper for the Board in April 2006 (see PRO 06/04/01). About 1-2% of adults and 5-8% of children have a food allergy and there are about 10 deaths a year attributed to food allergy, although the true figure may be higher as some deaths attributed to asthma may have food allergy as a trigger. In 2004/5 there were 829 hospital admissions in England caused by anaphylactic reactions to food². There is a cost to the person concerned and to the National Health Service for every anaphylactic shock reaction, which can result in a stay in hospital. In 2005 the average cost for treatments of shock and anaphylaxis was £471 per treatment³.
4. Recent research indicates that the prevalence of peanut allergy in children has risen over recent years from 1 in 200 to 1 in 55 (Tariq et al, 1996 and Hourihane et al, 2007), although part of this increase may be attributable to increased awareness and better reporting. In addition, about 1 person in 100 has gluten intolerance (coeliac disease)⁴. The prevalence of food allergy is not thought to vary significantly across the countries of the UK. However, the prevalence of lactose intolerance is higher in people of an Asian background than in the Caucasian population.
5. Consumers with food allergy and food intolerance rely heavily on information about the foods they buy to ensure their safety. This information can be in the

² <http://www.hesonline.org.uk/Ease/servlet/ContentServer?siteID=1937&categoryID=214>

³ <http://www.dh.gov.uk/assetRoot/04/13/32/28/04133228.xls> -
<http://www.dh.gov.uk/assetRoot/04/13/32>

⁴ Bingley, PJ et al. Undiagnosed coeliac disease at age seven: population based prospective birth cohort study. British Medical Journal. 2004: 7435:322-323

form of ingredients information that is a statutory requirement for pre-packed foods, voluntary labelling (such as the 'May Contain' warning statements used to alert consumers to possible allergen cross contamination), or it can come from dialogue with those providing foods that are not pre-packed. The Agency works in partnership with consumers, food producers, retailers and enforcement officers to help to ensure that the information available to consumers enables them to choose their food safely, but at the same time is not unnecessarily burdensome for industry.

6. The Agency also has a further important partnership with its research contractors which provides the scientific and other evidence needed to underpin policy development.
7. Work on food allergy and intolerance is being taken forward by the Agency in England, Scotland, Wales and Northern Ireland, particularly in terms of raising awareness and the provision of training for enforcement officers. The Department of Health has responsibility for the treatment of allergic diseases, including food allergy, but the Agency has responsibility for other aspects of food allergy including labelling legislation, guidance, and the commissioning of research to underpin policy approaches. The Agency works closely with Department of Health, for example, in relation to the inquiry by the House of Lords Select Committee on Science and Technology (see below).

Current Activities

8. The Agency last considered progress on its work on food allergy and intolerance in April 2006 (paper PRO 06/04/01). This paper highlights substantial progress in six key areas. Details of other work can be found in Annex I.
 - Improvements to the statutory labelling requirements – European legislation adding two further allergenic foods (molluscs and lupin) to those that have to be declared when used as ingredients in pre-packed foods is being implemented into national legislation by December this year. In addition, there is likely to be further European legislation in October to provide for permanent exemption from the labelling provisions for some derived ingredients that are currently temporarily exempt. These exemptions will be on the basis of European Food Safety Authority opinions that the derived products are so highly processed that they do not present an allergenic risk.
 - Provision of allergen information for non-prepacked foods – Foods that are not pre-packed are exempt from statutory allergen labelling requirements and therefore consumers buying such foods are dependent on information provided voluntarily by the vendor. The Agency is working in partnership with this part of the food sector, consumers and enforcement officers to produce voluntary best practice guidance in this area. A draft was the subject of public consultation in 2006 and the guidance is now being finalised, with publication

expected shortly. In addition to the main guidance document aimed at larger catering and retail businesses and enforcement officers, a short leaflet covering the key messages is being prepared for small and micro businesses. This leaflet uses simple text and is very pictorial to make it easily accessible for such businesses, as well as to meet the needs of those who do not have English as a first language.

- Commissioning of research to underpin policy development – Current Government advice is that women whose children have a family history of allergic disease may wish to consider avoiding peanuts when pregnant and breastfeeding. This precautionary advice is based on a recommendation from the Committee on Toxicity in 1998. There is more recent evidence to suggest that early oral exposure to significant amounts of peanut may, in fact, induce tolerance rather than sensitisation and allergy. The Agency, the main funder of food allergy research in the UK, has recently commissioned research to add on to a large scale, intervention study funded by the American National Institute of Health, which started in London in December 2006. This Agency-funded project will investigate the mechanisms involved in the development of tolerance or allergy in children at high risk of developing peanut allergy (who have eczema and/or egg allergy) who are given peanut snacks or who follow the standard Government advice. This project is a very cost-effective way of funding research in this important area and other opportunities for collaborative funding are being actively sought. The Agency spends about £1m per annum on research into food allergy and food intolerance.
- Guidance on allergen management, including management thresholds to inform labelling decisions – The Agency published best practice guidance on allergen management and consumer information ('May Contain' labelling) in July 2006. The UK is one of the first countries to address this issue and the Agency has presented this work to national and international audiences. This guidance provides qualitative advice on how to manage allergen cross contamination but does not include management thresholds below which allergen advisory labelling is not warranted. This is because there is not yet international scientific agreement on how to set such management thresholds. The Agency joint funded an international workshop in May 2007 to consider the mechanisms by which such management thresholds might be determined and what further research was needed to fill any gaps in the information currently available. The Agency is a joint author of a scientific paper being written to summarise the outcome of the workshop, and will consider which of the key research needs that were identified it could commission to take this issue forward. The Agency will continue to participate in further international developments in this area.
- Gluten free foods – The Agency will be participating in discussions at the Codex Committee on Nutrition and Foods for Special Dietary Uses in November, which it is hoped will agree a standard for foods that are described

as gluten free. The Agency is active in discussions within the EU in preparation for this Codex meeting. This standard will cover the limit of gluten that is permissible, as well as the descriptions that can be applied to such foods and the methods of analysis to be used to determine the levels of gluten in food products. In addition, the Agency is aiming to commission research to gather evidence on the nutritional status of people following a gluten free diet, which will include an assessment of the need to fortify gluten free flour products with the nutrients that currently have to be added to white and brown wheat flour, as well as the need to fortify with folate.

- Alerting consumers to food allergy incidents – There have been an increasing number of food allergy incidents in the last 18 months thought, in part, to be a consequence of increasing awareness amongst enforcement officers as a result of Agency training, and of an increase in monitoring activities by Local Authorities following implementation of the allergen labelling legislation in November 2005. The majority of these incidents are due to incorrect or inconsistent allergen labelling (see Annex I). The Agency streamlined the way in which it handles food allergy incidents in March 2007. The opportunity was taken to introduce an SMS message system for food allergic and food intolerant consumers, who can sign up to receive an SMS text message whenever a food product is recalled or withdrawn for food allergy reasons. This provides an efficient and rapid way of alerting this vulnerable group of the population to foods that may pose a risk to their health and over 700 subscribers had signed up to this service by the end of July.
- In 2006, the House of Lords Select Committee on Science and Technology announced it was conducting an inquiry to investigate allergy and allergic disease. The Agency submitted written evidence in October 2006 and was also called to give oral evidence in January 2007. The Select Committee is expected to release its report on the inquiry at the end of September 2007. The Department of Health will co-ordinate the Government response to the report, which has to be made within 2 months, and the Agency will work with them to address issues relating to food allergy.

Impact

9. Food allergies and intolerances have a significant impact on the daily lives of consumers with these conditions and on their families. This work contributes to the social pillar of sustainability in addressing the impact of food allergy. The Agency's work in this area will increase understanding of underlying mechanisms and improve general awareness of these issues, thus helping people with food allergy and food intolerance to make more confident and informed choices.

Board Action Required

10. The Board is invited to:

- **note** the substantial progress made since April 2006 Board meeting, and the further activities planned.

TABULAR SUMMARY OF PROGRESS ON INITIATIVES WITHIN THE AGENCY PLAN TO HELP CONSUMERS WITH FOOD ALLERGIES AND INTOLERANCES

Consumer Information

ACTIVITY	PROGRESS/FUTURE WORK
Legislation on labelling of allergenic ingredients in pre-packed foods	<ul style="list-style-type: none"> • Directive 2006/142/EC, adding lupin and molluscs to the specified list of allergens that have to be labelled, to be implemented into national legislation by December 07. • List of derived ingredients that are temporarily exempt from labelling to be reviewed by EFSA and the European Commission by November 2007 and any changes to European legislation then to be implemented into national legislation.
Provision of allergen information for non-prepacked foods	<ul style="list-style-type: none"> • Legislation on declaration of allergenic ingredients exempts foods sold non-prepacked, as long as consumers receive sufficient information. • Publication of final guidance and summary advice for small and micro businesses scheduled for October 2007. • Agency to work with trade bodies to promote guidance and with consumers so they more clearly understand what information can be provided in different parts of the catering and food service sector.
Guidance on allergen management and advisory labelling for possible allergen cross contamination	<ul style="list-style-type: none"> • Guidance was published in July 2006 with leaflet for small businesses published in the autumn. • Agency joint funded an international Workshop in May 2007 with EU-funded consortium to discuss setting of management thresholds for allergens in foods and is co-authoring a scientific paper summarising the discussions. • Research needs identified at this workshop being considered to identify which questions should be addressed through commissioning of new Agency research.
Food Allergy incidents	<ul style="list-style-type: none"> • Agency dealt with 50 food allergy incidents in 2006, 20 of which resulted in Food Alerts being issued and 37 in the first 7 months of 2007. Most related to incorrect labelling of foods because product was put in wrong packaging, or to inconsistencies in labelling between information in ingredients' list and in allergy advice statements/ boxes or between inner and outer packaging for multi-packs. • Agency streamlined handling of food allergy incidents in March 2007 and at same time launched an SMS message service for consumers to provide an efficient and rapid way of alerting them to products that may pose a risk to health of people with food allergies or intolerances.

ACTIVITY	PROGRESS/FUTURE WORK
Input into House of Lords Select Committee inquiry on allergy	<ul style="list-style-type: none"> • Agency provided written evidence in October 2006 and gave oral evidence in January 2007. • Agency will contribute to the Government response to the House of Lord Select Committee report, which is expected to be published in October 2007.
Information needs of teenagers and young adults with food allergies and intolerances, including co-ordinating with other Agency work with schools, especially work with School Food Trust	<ul style="list-style-type: none"> • Clinical research indicates that teenagers and young adults are most at risk of having adverse reactions to foods to which they are sensitive. One key time when information is needed is move to secondary school. • Agency working with schools to meet this need, e.g. produced advice for school governors at the end of 2006. • Agency continues to work on food and diet issues with UK education and health departments along with other partners, including the School Food Trust in England. • Agency working with School Councils to explore how best to provide information on food allergy and intolerance for this age group.
Fact sheets for food allergic and intolerant patients	<ul style="list-style-type: none"> • Previous document was updated in partnership with British Dietetic Association, and published in August 2006. • Agency working with the Life Channel to produce 2 short films (one on allergy and the other on intolerance) for screening in GP surgeries, based on these fact sheets.

Training and information for catering and enforcement sectors

ACTIVITY	PROGRESS/FUTURE WORK
Development of training materials for enforcement officers	<ul style="list-style-type: none"> • Talks on food allergy issues included in Agency's Update training courses for enforcement officers since 2004. Feedback from courses showed significant demand for further training on food allergy. • Agency developed training materials to address this need, to be used in training for enforcement officers delivered by Agency, with 25 courses in England, 3 in Wales, 3 in Northern Ireland and 15 in Scotland during 2007. • Agency to start to work with external training providers to include food allergy in their training courses for enforcement officers. • Specific projects underway in Scotland, Wales and Northern Ireland to increase training in, and awareness of, food allergens for enforcement officers. FSA Scotland launched a project to improve allergen awareness and training for enforcement officers and small businesses, FSA Wales has joint initiative with CIEH in Wales to raise awareness of food allergy issues amongst enforcement officers, and FSA Northern Ireland has joint initiative with the Republic of Ireland and organised conference and 7 training workshops for enforcement officers.

Research

ACTIVITY	PROGRESS/FUTURE WORK
Peanut intervention study	<ul style="list-style-type: none"> Agency has commissioned add-on mechanistic studies onto US-funded clinical study being conducted in London to investigate whether early oral exposure to peanut can induce tolerance rather than sensitisation and allergy in young children at high risk of developing peanut allergy. Study started in July 2007 and will finish in 2012.
Review of current Government advice on avoidance of peanut consumption during pregnancy and breastfeeding for mothers of children with family history of allergic disease	<ul style="list-style-type: none"> House of Lords inquiry on allergy questioned basis of current advice when Agency officials gave oral evidence. A systematic review of all relevant scientific literature since the publication of COT report on which Government advice is based was published in 1998 has been commissioned, which is due to finish in February 2008
Study to investigate effects of weaning practices on development of food allergy or tolerance in children	<ul style="list-style-type: none"> Study is being commissioned and a contract is likely to be agreed shortly, with the study being completed in 6 years time. Main aim of study is to assess whether early introduction of allergenic foods reduces the prevalence of food allergy at three years of age.
Projects to provide information on gluten thresholds and nutrient status of those following a coeliac diet	<ul style="list-style-type: none"> Need for scientific evidence to underpin setting of threshold for gluten in foods designed for those with coeliac disease. Literature review commissioned by Agency was completed in August 2006 and findings were provided to Codex for their discussions on standard for gluten free foods held in November 2006. Codex standard was not finalised at that meeting and Agency will be active in further discussions in November 2007. A call for research proposals to investigate the nutrient status of those following a gluten free diet will be issued in late September in RRD 26, and will include investigation of folate status.
Review of the Food allergy and intolerance research programme	<ul style="list-style-type: none"> The T07 research programme will be reviewed in February 2008 as part of the 5-yearly review of all Agency research programmes. This will look at the projects in the programme since the last review in 2003 and at future research needs.
Research project T07040 on certain food colours and benzoate preservative on behaviour in children	<ul style="list-style-type: none"> This project, which was commissioned in 2004, was completed in March 2007. Scientific paper summarising the research was published in the Lancet and COT reviewed these findings and issued a statement. Final technical report of the study was placed in Agency's library. Board to discuss these findings in September.