

Tests to inform FSA decision-making around sunflower oil substitution

As the UK's supply of sunflower oil continues to be severely impacted by the conflict in Ukraine, alternative food grade oils are currently being substituted for sunflower oil.

When considering alternative oils which can be used as a replacement for sunflower oil, the FSA has applied three tests to inform its decision-making.

[Our guidance on sunflower oil substitutions](#) has been supported by the three tests, along with our [rapid allergen risk assessments for rapeseed oil](#), and [palm oil, coconut oil and soybean oil](#).

Test One: Food and Feed Safety

The FSA must be satisfied, based upon the available scientific evidence, that the food or feed safety risk to the general population and to susceptible individuals is negligible or very low and can be managed by appropriate mitigating actions.

Test Two: Food Security

The FSA must be satisfied, based upon the available evidence, that disruption to the UK food and/or feed supply will be significant, extensive and with a risk of lasting for an extended period, so that consumers will suffer serious detriment from this disruption.

This is likely to mean, for example, that disruption extends beyond a single product or producer, and/or covers a whole class of products or very many products across different product classes and therefore there are no alternative choices for consumers.

When considering the detriment to consumers we will take into account the overall impact on food availability; we will also consider the need for consumers to have access to nutritious, culturally appropriate food, and the desirability of maintaining a supply of widely consumed foods that form a substantial part of the UK diet.

Test Three: Consumer information

Where labels do not comply with regulations, food businesses must provide up to date and accurate information to consumers in alternative formats. Food businesses must take all possible action to align labelling with legal requirements in as short a time as possible and must agree with their local authority enforcement officer the date by which alignment is to be achieved and maintained.