

**Food
hypersensitivity
strategy**

**2019-2025
FSA 20-01-08**



.....

**Strategic
framework**

.....

Our ambition

We want the UK to be the best place in the world to be a hypersensitive consumer

The FSA's Food Hypersensitivity Strategy sets out how we will make progress towards achieving our ambition.

We will do this in partnership with others within and outside government, continuing to play a leadership role to ensure we work together to maximise our impact.

Why this is important

Everybody deserves food they can trust. For people with a potentially life-threatening food hypersensitivity, that trust becomes even more important.

In the UK, an estimated two million people are living with a diagnosed food allergy, and 600,000 with Coeliac Disease. On average, two children per school class will have a food allergy and an estimated ten people each year will die as a result of a food allergy incident. Although such deaths are rare, reactions are much more common and can have both immediate and longer-term consequences for health and wellbeing. Teenagers and young people are particularly at risk as they make increasingly independent food choices.

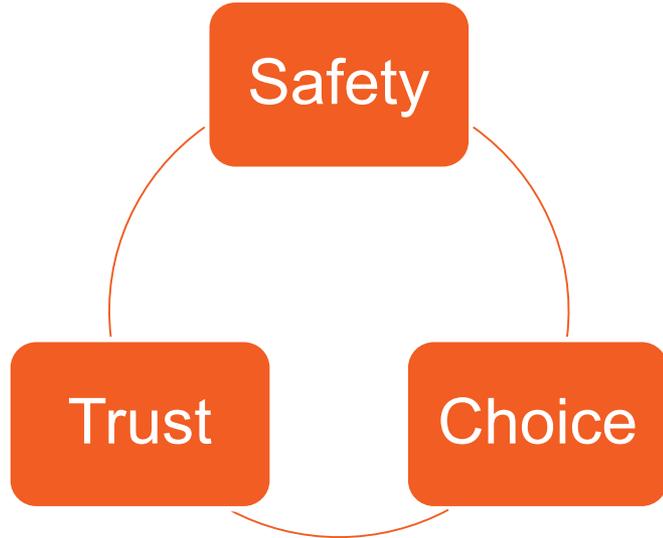
The cost of food hypersensitivity in the UK is significant and growing – the cost to the UK economy of hospitalisations from food hypersensitivity (which is only a small part of the total impact) is estimated at more than £80m per year. Using a measure to estimate the longer term impact on health and wellbeing, food hypersensitivity results in a greater reduction in quality of life than all other foodborne diseases combined.

We want to reduce avoidable deaths, reduce the negative impact of food hypersensitivity on both consumers and business, and make sure that food hypersensitive consumers have access to safe, high quality food.

Our vision

We want to improve the quality of life for people living with food hypersensitivity and support them to make safe, informed food choices to effectively manage risk.

Our work is organised into three themes



- **Safety** is about understanding food hypersensitivity and the associated risks. It is about making sure that food businesses and people with food hypersensitivity have accurate, useable and timely information to manage risks and prevent harm.
- **Trust** is about confidence to take appropriate action and make the right choices. Trust is important for everyone, not just for consumers but also for food businesses, for government and regulators, for charities and representative organisations and for the family and friends of people with food hypersensitivity.
- **Choice** is about making sure that people with food hypersensitivity are not unnecessarily excluded from participation in our food culture, for example eating out or ordering a takeaway.

Safety

Objective One

Consumers have accurate, easily understandable information needed to make safe and informed food choice, and effectively manage risk

- We will achieve a step change in consumer information by extending full ingredients labelling to food pre-packed for direct sale
- We will raise consumer awareness through a high-impact public information campaign, with a particular focus on young people
- We will carry out research to find out the most effective way for consumers to receive and act on information about allergens
- We will work with business to encourage sharing of best practice and innovative solutions to ensure accurate information about ingredients throughout the supply chain – this is essential to the provision of accurate consumer information

Safety

Objective Two

Food businesses understand their responsibilities and embed management of hypersensitivity in a strong food safety culture

- We will support business to implement full ingredients labelling for food pre-packed for direct sale by revising our comprehensive set of tools, guidance and training, and working in partnership with business and representative organisations
- We will raise business awareness through a high-impact information campaign emphasising the importance of their role in informing and protecting consumers
- We will support Local Authority enforcement officers through tools and training so that allergen management becomes an integral part of food safety and standards enforcement
- We will use the lessons learned from our work on incidents and food crime to understand why and where things go wrong and how to avoid future harm

Safety

Objective Three

We improve understanding of the causes and impact of allergen incidents and adverse reactions

- We will review our evidence base and ensure that our forward research programme is focused on those areas that will best support our objectives
- Using the FSA's Cost of Illness and QALY methodology we will estimate and publish information about the impact of food hypersensitivity for the economy and for individuals
- We will develop new reporting and data sharing mechanisms, including a food allergic reaction reporting scheme, to ensure sharing of information about the causes and prevalence of adverse reactions to food
- We will use our horizon-scanning and surveillance capability to improve our ability to anticipate future threats, for example from novel ingredients

Trust

Objective Four

Consumers trust the allergy information provided to them and can make informed decisions to effectively manage risk

Objective Five

Consumers trust that effective enforcement action is taken where non-compliances are identified

- We will work in partnership with organisations within and outside government so that information about allergens is clear and consistent wherever it comes from
- We will explore how information about allergen management can be provided through trusted schemes such as the FHRs scheme or similar so that customers have extra assurance when eating out of the home
- We will continue to work with Local Authorities to support effective enforcement action through guidance and training, and encourage sharing of good enforcement practice
- Through engagement and awareness campaigns we will ensure that businesses are aware of the consequences of and penalties for non-compliance, and consumers know that enforcement is effective and consistent

Choice

Objective Six

There is better public understanding and acceptance of food hypersensitivity.

Objective Seven

Hypersensitive consumers have access to a wide range of food products and services including eating out safely.

- We will work with partners such as Allergy charities and business organisations to raise awareness and understanding about food hypersensitivity and its impact
- We will use the FSA survey 'Food and You' to continue to track consumer experience, and commission specific pieces of work where needed to explore the experience of hypersensitive consumers in more depth
- Our work on Cost of Illness, QALYs and better reporting and data sharing will help us build a picture of how the experience of hypersensitive consumers is changing over time
- We will work through the Codex Alimentarius Commission to undertake further work on the usage and wording of precautionary allergen labelling to ensure that it is helpful and not unnecessarily restrictive

Our shared responsibility for delivery

The FSA's 'Food We Can Trust' strategy explains how we work in partnership.

Only by everyone working together and playing their part will we be able to deliver food we can all trust.

Responsibilities for consumer protection are shared – businesses, the FSA, other parts of central and local government, and consumers themselves all have important roles to play.

“It is the responsibility of people producing and supplying food to ensure it is safe and what it says it is. The Food Standards Agency has a key leadership role in making sure that they step up to that responsibility.”

“It is a responsibility of consumers to manage the risks relating to food that they can affect. They have a right to be informed and supported in responding to those risks. The Food Standards Agency has a key role to play in making this happen.”

Our regulatory principles

- We will put consumers first in everything we do.
- We will seek to align incentives and disincentives for food businesses with the interests of consumers.
- Our focus will be on the outcomes we are seeking to achieve, keeping an open mind about the means by which those outcomes are achieved.
- Our future regulatory approach should be truly risk-based and assessed in terms of impacts.
- We will use our powers to deliver our strategic objectives – which go beyond our regulatory responsibility in respect of verifying compliance with food law.
- Government intervention (including legislation) is warranted where its benefits to the public are proportionate to the costs/ disbenefits of its application.
- The costs to businesses of regulation should be no more than they need to be.
- It is not the FSA's or local authorities' role to achieve compliance – that is clearly defined in law as the responsibility of business.

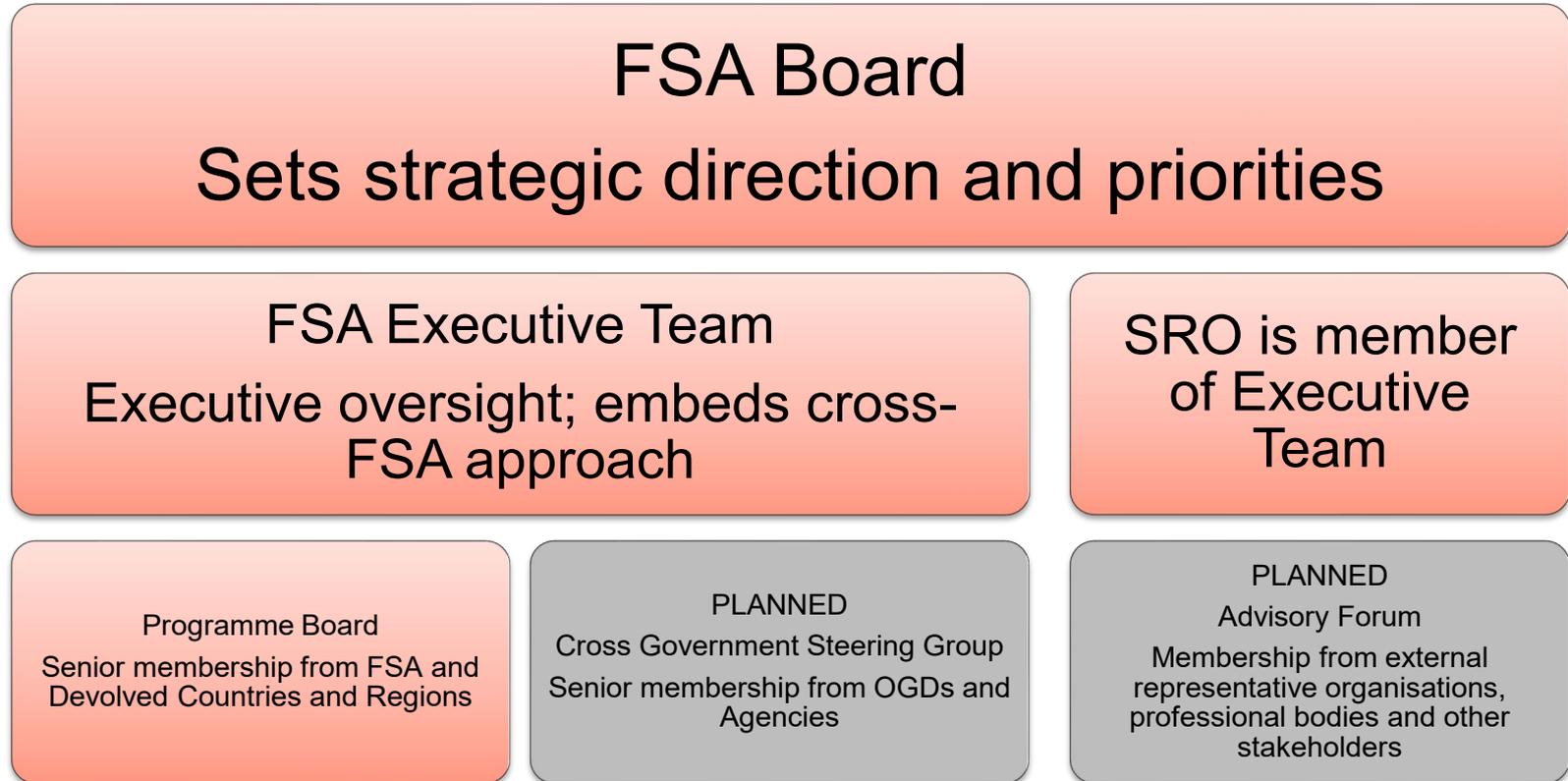
.....

Programme approach

.....

.....

Programme governance



Programme Board Members

Senior Responsible Owner: Rebecca Sudworth

Food Policy: Michael White

Communications: Catherine Clark

Regulatory Compliance: Michael Jackson

Science Evidence and Research: Michelle Patel

Digital and Data: Jenny Desira

Incidents: Tina Potter

Finance: Vikki Wright

Food Standards Scotland: Garry Mournian

FSA in Wales: Nathan Barnhouse

FSA in Northern Ireland: Sharon Gilmore

Programme Manager: Alice Teague

Strategic Programme Adviser: Mark Berman

PMO: Liz Kemp

Programme Board Terms of Reference

The Programme Board will support the programme, the SRO and Programme Manager by:

- providing overall direction, challenge and guidance and seeking assurance that the programme has adequate management controls in place
- taking decisions on matters presented by the SRO and/or programme manager as required
- ensuring that risks to the programme are appropriately identified and managed and that support is provided to ensure that they are mitigated in so far as is within the board's control
- ensuring that dependencies within and external to the programme are appropriately identified and managed
- ensuring that the programme remains consistent with the wider FSA Strategy and corporate objectives
- informing the SRO and/or the Programme Manager of relevant organisational matters that could impact on the programme achieving its objectives
- taking positive steps to enable programme delivery, for example ensuring that appropriate resources are dedicated to the programme where needed within the relevant business area