

Questions submitted for the FSA board

1. **Submitted by Hannah Bell (Information Officer) of The Anaphylaxis Campaign.**
 - 1.1 The Anaphylaxis Campaign welcomes the continued development of the Food Hypersensitivity Strategy and supports the vision and objectives outlined in the board papers.
 - 1.2 Following the implementation of the new PPDS rules, does the FSA envisage any further changes to improve current food legislation covering the provision of allergy information to consumers for foods which are not pre-packed?
 - Current legislation requires the provision of allergen information for non-prepacked foods and businesses have a legal obligation to provide accurate allergen information at point of sale. This can be done in a number of ways including in writing or verbally. The choice of the most effective way to provide information is part of the system that businesses should be providing to assure enforcement authorities that they are complying with information requirements.
 - Whilst there are no current plans to change food labelling legislation, the FSA keeps the provision of allergy information under review so that businesses are able to effectively provide the information that allergic customers need to make safe choices.
 - 1.3 In light of the increasing reports we receive from our allergic members about the use of allergy disclaimers in restaurants, how does the FSA plan to ensure that further public awareness campaigns don't have the opposite of the desired effect and increase reluctance from food businesses to cater for food hypersensitive customers altogether?
 - The FSA discourages the use of blanket disclaimers as control of allergens in any food environment should be part of a business' food safety management system. The FSA has plans for a business focussed allergy campaign that is based on feedback from consumers and businesses about how they see the issue.
 - 1.4 Can the board elaborate on its vision for the future direction of precautionary allergen statements? Can we expect progress on the standardisation of PALs within the five-year planning horizon outlined in the board papers?
 - The FSA is aware that there is inconsistency in the way in which 'may contain' statements are being applied. This is an extremely complex area due to the lack of agreed threshold data for the 14 main allergens but also due to an individual's susceptibility to differing levels of allergen protein depending on their current condition. The FSA has undertaken research in this area for a number of years as well as engaging in broader conversations

around how any such thresholds might be set. We are currently working as co-chair with the US and Australia to undertake new work on allergen labelling at Codex. At the 45th Session of the Codex Committee on Food Labelling (CCFL) held in May this year, the Committee agreed to start new work to review and clarify the provisions relevant to allergen labelling and develop guidance on precautionary allergen or advisory labelling.

2. Submitted by Darryl Thomson (Retired Head of Safety) involved in the RoF Industry Advisory Committee.

2.1 One of the positive elements of the Regulating our Future Initiative was the cross sector workshops involving people from industry, enforcement and central government. When people discuss issues from different viewpoints the quality of the debate and resulting solutions are much richer and more rounded. Yet, the FSA has not used such workshops when considering PPDS or other allergen issues. Does the Board agree that going forward it would be beneficial to include cross sector workshops as part of the Food Standard Agency's consultation on allergens?

- During the public consultation on PPDS the FSA held a number of workshops involving consumers, food businesses and representative organisations and Local Authorities. As we take forward our Allergy Programme it will be important for us to provide a range of opportunities to capture views from all perspectives.