

Food is essential for human life, as well as a way to improve our health condition. Eating cultures also structure our life in society. However, for food allergy patients and those having food-related hypersensitivities and intolerances, food often becomes a source of daily stress, worry and fear that might lead to unnecessary restrictions, poor quality of life, social isolation and even death. Food allergy is not rare: up to 25% of Europeans react to food (allergy, hypersensitivity, intolerance) and about 17 million Europeans suffer from food allergies, with 3.5 million of them less than 25 years of age. Alarmingly, the number of children with allergy less than 5 years old has redoubled over the past ten years, and the emergency room visits for life-threatening anaphylactic reactions have increased seven-fold.ⁱ

Unfortunately there is no cure for food allergy, and the only protection against symptoms is avoiding and abstaining consuming allergens. People with allergy or intolerance must therefore be able to identify the ingredients they are sensitive to. To improve safety and quality of life of people with allergy, the new European Union Regulation 1169/2011ⁱⁱ on food information to consumers will enter into force on the 13th of December 2014.

Ahead of the implementation of this regulation, the European Federation of Allergy and Airways Diseases Patient's Associations (EFA)ⁱⁱⁱ, in collaboration with EFA's longstanding partner – the European Academy of Allergy and Clinical Immunology (EAACI)^{iv}, organised on the 24th of September 2014 the event *"Eating safely: round table on European best practices on allergens labelling"* in order to discuss legislative novelties and best practices on allergens labelling across Europe.^v The event was hosted by the Member of the European Parliament Renate Sommer^{vi}, who was the Rapporteur of the regulation in the European Parliament.

Approximately sixty stakeholders attended the event including key representatives from the EU institutions, national food safety and health authorities, healthcare professionals, food industry and patients. The round table was divided into two parts focusing on two key topics: 1) during the plenary session, food allergy experts, policy makers and patients presented the novelties in research and legislation and the patient experience, 2) and during the panel discussion, representatives of national food safety and health authorities, as well as EFA Food Allergy Working Group members from national EFA associations, presented national-level best practices and plans on food labelling to ensure allergic patients' safety, and to comply with the new regulation.



“You have the right to know if the ingredients you cannot eat are in the food you eat”, MEP Renate Sommer

The discussion was opened by Renate Sommer (Germany, European People’s Party), a Member of the European Parliament actively engaged in the work of the Committee on the Environment, Public Health and Food Safety (ENVI).^{vii} As a Member of ENVI, in 2011 Ms. Sommer was the Rapporteur during the decision-making process on the regulation on food information to consumers that took place at Parliament.

In her welcoming speech, Ms. Sommer expressed her satisfaction with the compromise reached in the regulation as overall “it is a good message to people suffering from food allergy, with the new regulation there will be new information labelled where you can find ingredients easier and faster”. For her this regulation responds to a basic need. “People have the right to know if the ingredients

they cannot eat are in the food they eat”, she underlined. Although the new legislation only requires 14 allergens to be specified, Ms. Sommer stated her intention to call for additional known allergens to be recognised by the European Union and therefore included in the regulation. She also pointed out the need to establish mechanisms to measure and declare foods that might have been affected by cross-contamination of allergens. For MEP Sommer, who also hosted back in 2012 an EFA’s event in collaboration with EAACI on the new regulation on the food provision of food information to consumers^{viii}, “although it is important to give legal certainty to the food industry by including the *may contain*, we should avoid its misuse”.



Renate Sommer has been elected Member of the European Parliament since 1999

“Allergies can drive you crazy”, EFA President Breda Flood

EFA is the European-level umbrella organisation representing people with food allergy in Europe at Europe. For EFA’s President Breda Flood it is crucial that food allergy patients are represented and taken into account at European level, “the disease’s incidence is constantly growing and unfortunately it still results in deaths due to anaphylactic reactions”, she pointed out. Ms. Flood emphasised that sometimes scientists define allergy as a *crazy* disease, given that the immune system of an allergic person fails to distinguish between dangerous substances and harmless ones. However, “allergies can make you crazy too!” stressed Ms. Flood, as not only the struggle to avoid allergens can lead to poor nutrition and reduced quality of life, but also can lead to social isolation. Given that being informed on the presence of allergens is the only way for people with allergy to keep themselves safe, Breda Flood welcomed the adoption of the new food information to consumers’ regulation, as it is a fundamental step forward towards the protection of Europeans with food allergy and intolerances.



EFA President Breda Flood and board member of the Asthma Society of Ireland

FOOD ALLERGY IN EUROPE: AN INCREASING THREAT

“The moment we realised our child was allergic, we started to avoid everything, including life”, Swedish Asthma and Allergy Foundation, Mikaela Odemyr

Food allergy patients are not the only ones that need to adapt to the disease. When the patient is a child the whole family shares responsibility of his or her well-being. Mikaela Odemyr, Swedish mum of three children who have severe asthma and allergies, and member of the Board of the Swedish Asthma and Allergy Foundation,³⁸ knows it well. Mikaela told the participants that having a child suffering from food allergy was not easy at all, “when we discovered my son was intolerant, we were caught up from our lives, we started to avoid everything”. For her, as for any parent, it was hard to take that her son would never be able to taste her best dishes and to live carefree as other kids. She explained that having food allergies feels almost as a social handicap but “I am a mother who doesn’t accept”. She wanted her child to be part of the community and did her best to make her son feel “almost like anyone else”. Once she decided to go with her kid to a restaurant to eat the famous Swedish meatballs and she warned the chef off her son’s allergies. Nonetheless, after few bites, Mikaela’s son experienced a severe anaphylactic reaction and almost died. In addition, the attack significantly worsened her son’s condition due to aggravated asthma and continuous stomach problems for months. “Food can kill”, reminded Mikaela as she expressed her satisfaction with the new regulation, “it will significantly increase the confidence of people with food allergy and their parents when buying pre-packed food and going to restaurants”.



Mikaela Odemyr from the Swedish Asthma and Allergy Foundation

“Food allergy is not a trivial disease, a healthy human being can worsen in seconds from an allergic reaction”, EAACI Secretary General and President Elect Antonella Muraro

Food allergies are often underreported and unknown by the public, but scientist are discovering worrying trends in the increase of food allergies. In this sense, EAACI Secretary General and President Elect Antonella Muraro underlined that food allergy should not be considered as a trivial disease. But how to better manage the threatening burden of food allergy? “Food is everywhere; we don’t want children restricted at home, trapped by their allergy like if they were in jail. We want them living in the community”, explained Professor Muraro. The first step to overcome the social restrictions created by food allergies entails improving diagnosis. “Proper diagnosis of allergy means proper medical allergy services”, a step that requires more education for patients and a collective effort in the communities, who could them provide certain emergency treatment on-site and integrate the possibility of individual allergy management plans. According to Prof. Muraro the scientific community needs to work harder to understand patient diversity. “We do not know yet who is prone to have a severe reaction”, she explained. Investing in specialised research could lead to improve diagnosis and find a cure, individualise the treatment and avoid deadly episodes.



EAACI Secretary General Prof. Antonella Muraro is also EAACI President-Elect for 2015-2017

“We are exploring what can be done to improve the clarity of allergen labelling”, EFSA, Silvia Valtueña Martínez

The European Food Safety Authority (EFSA)^x recently published a draft opinion on the evaluation of allergenic foods and food ingredients for labelling purposes in Europe^{xi}. According to Silvia Valtueña Martínez, Senior Scientific Officer at the Human Nutrition Unit, EFSA received 274



Silvia Valtueña Martínez is Senior Scientific Officer at the Human Nutrition Unit of EFSA

comments from 30 interested parties, including universities, medical societies, research consortia, governmental and non-governmental organisations, food industry and patients’ associations (including EFA). All comments will be available in a technical report to be published together with the final adopted opinion in November 2014, indicating whether or not such comments lead to changes in the opinion, why, and which are the changes made. Ms. Valtueña Martínez underlined that EFSA is currently “exploring what can be done within the current legal framework to improve the clarity of allergen labelling”.

“We consider that consumers should still check the ingredients list”, European Commission Alexandra Nikolakopoulou

According to the new regulation coming into force from the 13th of December 2014, the clear reference to allergens must be given in the ingredients’ list of all pre-packed food. Information must be available and easily accessible and emphasised through a different typeset (e.g. *font style*, **colour** or **background colour**) and for every allergen derivative, even in forms of the same allergen (e.g. casein –milk-, whey protein –milk-). Given that Member States will be able to decide on particular means through which the information will be provided, namely in the case of non pre-packed food, Alexandra Nikolakopoulou underlined that the European Commission^{xii} has prepared a Question & Answer document^{xiii} to help Member States to implement the new rules in the best possible way. In addition, she informed that Commission and Member States are currently updating the Commission guidance on allergen labelling as there are some challenges ahead to address. Nevertheless, she recommended allergic consumers to “stay alert and check the ingredients’ list carefully”.



Alexandra Nikolakopoulou works at the Nutrition, food, composition and information unit at DG SANCO

“Without qualitative risk assessment rules, it is difficult to prevent the unintentional presence of allergens”, F&D Europe, Beate Kettlitz

Allergen labelling is crucial for food industry. Beate Kettlitz from Food and Drink Europe^{xiv} stressed that “minimising the risks from allergenic foods is a shared responsibility of all stakeholders, starting from producers and ending with the consumers”. According to Ms. Kettlitz, today 40% of food industry recalls in the United Kingdom, United States of America and Australia are related to allergens, so “it is also in the interest of food industry to keep their customers informed”. In her presentation, Ms. Kettlitz underlined that effective risk management of food allergens requires careful consideration of allergen presence integrated into good manufacturing practices across all food production stages “from farm to fork”. However, she called for a

consolidated guide on allergens that would include good practices and up-to-date information on risk assessment rules, aiming at preventing the unintentional presence of allergens. She suggested that such guide would be used in all types of food manufactures. Ms. Kettlitz welcomed the initial development of an EU-wide risk-based approach to precautionary allergen labelling, given that “current precautionary allergen labelling standards and practices are very divergent across Europe and often this leads to unnecessary confusion and limitation for consumers”. Ms. Kettlitz also highlighted the importance of the quantitative risk assessment.



Beate Kettlitz is Director for Food, Safety, Science and R&D of Food and Drink Europe

WHAT ARE THE BEST PRACTICES ON ALLERGEN LABELLING IN EUROPE?

Germany

German practices on food labelling date from 2007, when the Federal Ministry of Food and Agriculture of Germany^{xv}, launched the first plan against allergies, followed by the 2008 German Federal Council requiring allergen labelling for non-pre-packed form in a written form. According to Hilke Thorsden, Consultant for the German institution, this requirement has been under discussion since 2012. The debate on the implementation of the new EU regulation includes the following points:

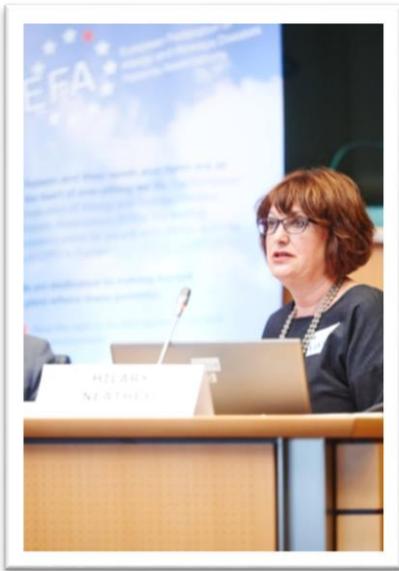
1. Need to ensure a high level of protection for consumers and to maintain a wide range of choices for persons suffering from allergies with reliable information;
2. Need to ensure practicability and flexibility for food business operators;
3. Need to ensure verifiability for the controlling authorities.

The regulation stipulates that food business operators in Germany are free to choose the appropriate measures on allergens labelling: 1) Sign on the product/near the product; 2) Written or electronic information; 3) Mention on menus or in price lists; 4) Notice in the sales shop.

However, the provision of oral information will need then further debate as, according to a recent survey,^{xvi} often oral information provided to allergic consumers without written documentation is not correct.



Hilke Thorsden is a Consultant for the German Federal Ministry of Food and Agriculture



Hilary Neathey is responsible for the delivery of legislation and policy on food composition and labelling

Food allergy statistics in the United Kingdom are truly alarming: approximately 2% (1.3 million) people suffer from food allergy and 1% (1 in a 100) people have coeliac disease. That totals approximately 2 million UK consumers whose food choices are dictated by their allergy or intolerance. According to Hilary Neathey from the Wales Executive office of the UK Food Standards Agency (FSA)^{xvii}, communication between all stakeholders in the food chain is key to implementation of the new EU regulation. “It is crucial that both food business operators and consumers communicate with one another at all stages of the food chain”, she stressed. In order to enforce the new allergen requirements of the Food Information to Consumer Regulations FSA has developed a variety of tools, targeted at stakeholders – but particularly small to medium size enterprises- in order to support them with compliance with the new rules. . Among these, the audience was impressed by the user- friendly layouts of the guidelines for consumers on allergen labelling^{xviii}, the infographics explaining the different allergens and their derivatives^{xix}, the technical guidance on the implementation of the new regulations for businesses and enforcers^{xx}, and the free online training on food allergies^{xxi}.

Denmark 

The Danish government aims at ensuring the consumers’ right to obtain allergen information in pre-packed and non-pre-packed food, as well as to address the issue of unintentional presence of allergens by developing and implementing a clear guidance on “may contain” and other warnings. According to Pernille Lundquist Madsen, from the Danish Veterinary and Food Administration (DVFA)^{xxii}, Denmark together with Norway, Sweden and Finland launched a monitoring campaign^{xxiii} on precautionary allergen labelling during the period of 2010-2012 to get a better understanding of precautionary labelling issues. The project was based on the idea that the correct labelling of allergens is crucial for the health of food allergy patients and that the extensive use of warning labels will make it harder for allergic patients to choose products. The goal of the project was multifold: (1) to raise awareness among food operators on taking their responsibility for labelling and highlighting allergens on their products in a correct way, (2) to increase the food business entrepreneurs’ knowledge of allergy safety and to encourage companies to use the best warning labels practices, (3) to develop a common approach on the use of precautionary labelling and to promote a closer cooperation among Nordic countries on allergen labelling. Ms. Madsen stressed that the project was a great opportunity for the three countries to meet and exchange views, and that it served to organize numerous meetings and training for food industry representatives and people with food allergy.



Pernille Lundquist Madsen is Deputy Head of the Chemistry and Food Quality Division in the Danish Veterinary and Food Administration

The Netherlands

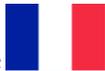


The first Dutch legislative initiatives on allergens labelling date back from 2003. Marjan van Ravenhorst, from the Dutch Food Allergy Foundation^{xxiv} stressed that “pre-packed food need unambiguous, complete and reliable information”. She emphasised the need to have a clear regulatory base and the establishment of thresholds to face the challenges posed by possible cross-contamination. Currently engaged in a European project aimed to develop a certified allergen management system, SimplyOK^{xxv}, she explained their use of a pictorial mark next to the ingredients declaration. When one of the 14 allergens listed in the EU regulation is used as an ingredient it is marked as **present**. **Maybe present** is used in case of a real risk of cross-contamination that cannot be avoided. The project is ongoing, but could soon become a European best practice on food allergen labelling.



Marjan van Ravenhorst is specialist on allergen management from the Dutch Food Allergy Foundation

France



France will require food allergen information in non-pre-packed food for immediate sale to appear next to the product in a written form. For Marie Quettier from the French Association for the Prevention of Allergies (AFPRAL)^{xxvi}, this “is a significant step as it provides the consumer with more reliable food information in mass-catering, bakeries, restaurants and so on”. Besides, the allergen information for non-prepacked food has been shaped by stakeholders from industry, restaurants, trade associations or consumer’s associations. The prospective French decree aims to ensure that: 1) name of food appears next to the food and 2) allergen information is free and directly available to consumers in a written form with a reference to the name of the food. “This decree and the EU regulation on information to consumers include allergen information as a food safety measure which raises the bar”, said Ms. Quettier, who added that *may contain* mentions are not included in the legislation, given that Article 36 of EU regulation considers *may contain* as voluntary food information and should be based on relevant scientific data. “We hope that precautionary labelling will be clearly distinguished if added to the allergen information”, concluded Ms. Quettier.

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Marie Quettier is mother of a 4 years old girl with multiple allergies

Italy



Giorgio Salerni from Federasma e Allergie Onlus presented the GAIA project (Food Allergies and Intolerances Group), an initiative aimed to train food business operators in the hospitality sector on allergen management in the Italian region of Liguria and thus to develop a regional approach on health systems. Although it has been a patient-led initiative, since September 2014 GAIA covers all the Liguria region.



Giorgio Salerni is Delegate to relations with supranational associations of Federasma e Allergie Onlus

CONCLUSIONS AND POLICY RECOMMENDATIONS

The EU regulation 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers is a positive step to provide standard requirements on the way allergens present in food are highlighted in the ingredients' list both for pre-packed and non-pre-packed food. Although it aims at improving the health and quality of life of people with food allergy, there is still room for improvement on the clarity of labelling, allergen cross-contamination and food businesses' awareness of allergenic foods. Below are the key recommendations, raised by the round table speakers, on how to ensure the highest degree of safety for people with food allergy within the framework of the new regulation, and beyond it.

For Member States:

1. Regulate the information on allergens for non-pre-packed food in a written way – flexibility when the direct contact with the person that has prepared the food is possible;
2. Develop programmes and updated tools on food allergen management addressed to people working in the food service sector;
3. Label consumption units in pre-packed food in a clear and readable way, clearly distinguish allergens from other ingredients to attract allergic consumers attention and facilitate their choices;
4. Systematically require an ingredients' list, irrespective of the size of the pack and both for pre-packed and non-pre-packed food, as many people are allergic to other substances than those 14 allergens mentioned in the regulation;
5. Share best practices among EU Member States' legislations and implementation.
6. Work in partnership with organisations representing people with allergy to find common sense solutions to every day issues

For the European Commission:

7. Review the current list of 14 existing allergens on the basis of the most recent scientific knowledge, to include other allergens;
8. Draft and implement EU-wide guidelines on food allergen management;
9. Develop European guidance on the use of precautionary “may contain” labelling.

Acknowledgements and further information

The success of this event would not have been possible without the support of MEP Renate Sommer, EFA's longstanding partner EAACI, speakers, and members of the EFA Food Allergy Working Group.

All **presentations** from the event are available for download as PDF files on EFA website.

EFA and EAACI's joint **press release** for the event is also available at EFA's website^{xxvii}.

Photos: © EFA / David Plas, available on EFA website^{xxviii}.

- ⁱ Data from allergy from EAACI (2011):
http://www.eaaci.org/images/files/Pdf_MsWord/2011/Press_Release/17%20million%20Europeans%20allergic%20to%20food;%20allergies%20in%20children%20doubled%20in%20the%20last%2010%20years.pdf
- ⁱⁱ European Union Regulation 1169/2011 on food information to consumers:
http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/proposed_legislation_en.htm
- ⁱⁱⁱ European Federation of Allergy and Airways Diseases Patient's Associations (EFA) website:
<http://www.efanet.org/>
- ^{iv} European Academy of Allergy and Clinical Immunology (EAACI) website: <http://www.eaaci.org/>
- ^v *Eating safely: round-table on European best practices on allergens labelling*, event programme:
<http://www.efanet.org/wp-content/uploads/2014/09/Final-programme-Eating-safely-Round-table-on-European-best-practices-on-allergens-labelling-September-2014-2.pdf>
- ^{vi} MEP Renate Sommer official website: <http://www.europasommer.de/>
- ^{vii} European Parliament ENVI Committee: <http://www.europarl.europa.eu/committees/en/envi/home.html>
- ^{viii} *Contains/May Contain – Food Allergen Labelling*, event programme: <http://www.efanet.org/wp-content/uploads/2012/10/Report-on-the-EFA-Food-Allergen-Event-FINAL.pdf>
- ^{ix} Swedish Asthma and Allergy Foundation website: <http://astmaoallergiforbundet.se/>
- ^x European Food Safety Authority website: <http://www.efsa.europa.eu/>
- ^{xi} EFSA Scientific Opinion on the evaluation of allergenic foods and food ingredients for labelling purposes: <http://www.efsa.europa.eu/en/consultationsclosed/call/140523.pdf>
- ^{xii} European Commission Directorate General for Health and Consumers website:
http://ec.europa.eu/dgs/health_consumer/index_en.htm
- ^{xiii} Question and Answer document on the Regulation on the provision of food information to consumers:
http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/docs/qanda_application_reg1169-2011_en.pdf
- ^{xiv} Food & Drink Europe website: <http://www.fooddrinkeurope.eu/>
- ^{xv} Federal Ministry of Food and Agriculture of Germany website:
http://www.bmelv.de/EN/Homepage/homepage_node.html
- ^{xvi} Survey held by the German Allergy and Asthma Society (DAAB): <http://www.daab.de/>
- ^{xvii} United Kingdom Food Standards Agency website: <http://www.food.gov.uk/>
- ^{xviii} *Advice on food allergen labelling How to buy food safely when you have a food allergy or intolerance*, November 2013, UK Food Standards Agency:
<http://www.food.gov.uk/sites/default/files/multimedia/pdfs/publication/allergy-leaflet.pdf>
- ^{xix} Allergens and allergy infographics, UK Food Standards Authority, <http://www.food.gov.uk/business-industry/allergy-guide/allergen-resources#toc-4>
- ^{xx} *Food allergen labelling and information requirements under the EU Food Information for Consumers Regulation No. 1169/2011: Technical Guidance*, August 2014, UK Food Standards Agency:
<http://www.food.gov.uk/sites/default/files/food-allergen-labelling-technical-guidance.pdf>
- ^{xxi} *The impact of food allergy*, online training by the UK Food Standards Agency:
<http://allergytraining.food.gov.uk/>
- ^{xxii} Danish Veterinary and Food Administration website:
<http://www.foedevarestyrelsen.dk/english/Pages/default.aspx>
- ^{xxiii} Denmark, Norway and Sweden allergen monitoring campaign: <http://norden.diva-portal.org/smash/get/diva2:700875/FULLTEXT01.pdf>
- ^{xxiv} Dutch Food Allergy Foundation website: <http://www.voedselallergie.nl/>
- ^{xxv} Simply OK Project website: http://www.simplyok.eu/index_EN.php
- ^{xxvi} French Association for Allergies Prevention (AFPRAL) website: <http://allergies.afpral.fr/>
- ^{xxvii} *Press release: Better food labelling is key to save lives from food allergy reactions in Europe*, 2nd October 2014, EFA /EAACI: <http://www.efanet.org/press-release-better-food-labelling-is-key-to-save-lives/>
- ^{xxviii} EFA / David Plas potos: <http://www.efanet.org/efaeaaci-food-labelling-event/>