Gaps in Food Allergen Labeling

The Scientific Status Summary, “Food Allergies and Other Food Sensitivities” by Steve Taylor and Susan Hefle (pp. 68–83), defines food allergies and sensitivities as individualistic adverse reactions to foods. One aspect of food allergies, however, contains a common thread. In virtually all the accounts of fatal allergic reactions, the deceased people knew of their allergy but did not know that the food they consumed contained the fatal allergens. For food technologists and food manufacturers, this is a major concern. Errors or oversights in manufacturing or product labeling could have fatal consequences for some consumers. The food industry now recognizes allergens as an important food safety issue, and responsible food companies have implemented programs to address these issues.

The Food Allergen Labeling Guidelines developed by the Food Allergy Issues Alliance (FAIA) and the Code of Practice developed by the National Food Processors Association (NFPA) represent major steps forward in industry consensus on allergen issues, but these documents fail to address a number of details. Unfortunately, we lack absolute answers to the many questions about how clean is clean enough and how much of an allergen is needed to provoke an allergic reaction.

The Scientific Status Summary, prepared for IFT’s Expert Panel on Food Safety and Nutrition, addresses the implications of serious allergies for food manufacturers, with references that describe how to set up manufacturing and labeling programs. The Food Allergy Research and Resource Program of the University of Nebraska conducts useful seminars that educate food manufacturers on allergy issues and control methods. Food processors who deal with potentially harmful food allergens should implement control programs that include employee education at all levels, from line workers to company management. These programs also should cover manufacturing and cleaning practices as well as appropriate labeling.

The Summary discusses some of the gaps in the labeling regulations. Although ingredient statements are not required to declare flavor and spice ingredients, unlabeled allergens introduced into foods via flavors have triggered numerous allergic reactions. Fortunately, many manufacturers have recognized this problem and now include allergens from flavors in their ingredient statements. When the information is requested, the flavor industry has been very responsive in providing manufacturers with information on allergens in flavors. Furthermore, the Food and Drug Administration strongly encourages the labeling of allergens in flavors and spices even though the agency does not have regulatory authority to require it.

The labeling of ingredients by “common and usual names” as required by the Code of Federal Regulations has presented problems for allergic consumers. The typical consumer may not know that caseinate and lactalbumin are milk proteins or that semolina is wheat flour, although from the legal perspective these are common and usual names. The new industry guidelines from FAIA and NFPA encourage manufacturers to identify such ingredients in common language so that consumers can more readily identify potential problems. This trend is a very positive step.

Two aspects of labeling continue to concern me. First, the Summary notes the existence of sensitivities and allergies to a great many food components in addition to the “Big Eight” allergens (peanuts, tree nuts, fish, shellfish, eggs, milk, wheat, and soybeans) that cause 90% of the problems. With a little attention to details, labels could be more helpful to the individuals with the less common sensitivities. For example, although FD&C colors must be identified in ingredient statements, noncertified colors can be collectively listed without specific identification, despite reports of allergic reactions to noncertified colors. Noncertified colors, most of which come from plant substances, are probably more allergenic than FD&C colors, so identifying them in the ingredient statement would be appropriate.

The second labeling gap of concern is “non-dairy” labeling. The name “non-dairy creamer” evolved in a natural way to identify coffee whiteners made from caseinates and vegetable oil. This naming practice developed before the serious consequences of milk allergies were widely recognized. These products could not be called “creamers” without qualification because they do not contain cream. FDA recognized that the name of these products can present an identification problem for milk-allergic consumers. In the regulations implementing the Nutrition Labeling and Education Act, the agency added a requirement that products labeled as non-dairy but containing caseinates specify in the ingredient statement that caseinates are proteins derived from milk. Even with the milk ingredient labeling on the side panel, some people see the prominent “non-dairy” statement on the product label and assume that the product is safe for milk-allergic individuals. As a result, people, typically children, wind up in emergency rooms with anaphylactic reactions to the milk protein in these “non-dairy” products. These incidents will continue as long as the “non-dairy” name is used on products containing milk protein, or until identification of the milk origin of the ingredients is given a labeling prominence equal to that of the “non-dairy” statement.

The Food Allergy and Anaphylaxis Network (FAAN) has played a significant role in stimulating constructive industry and regulatory response to food allergy issues. FAAN has operated on the premise that working together with the food industry and regulators achieves more in advocacy for allergy sufferers than an adversarial approach. FAAN has a medical advisory board that includes many of the most respected food allergists in the world. Using cooperative approaches and sound medical science, FAAN is achieving its goal of helping food allergy sufferers and has established high credibility with the industry, the regulators, and the media. ●