

Monday 22nd May 2023

**Re. Consultation on updates to the Food Standards Agency's Technical Guidance on food allergen labelling and information requirements**

Dear sir or madam,

Thank you for the opportunity to comment on this consultation.

IFST is the UK's leading professional body for those involved in all aspects of food science and technology. We are an internationally respected independent membership body, supporting food professionals through knowledge sharing and professional recognition. Our membership comprises individuals from a wide range of backgrounds, from students to experts, working across a wide range of disciplines within the sector.

IFST comments and suggestions are highlighted below in red.

**Precautionary Allergen Labelling Statements**

IFST agree with and support the proposed Best Practice Statements, and would request the additional points for clarification (highlighted in red):

- PAL should not be used in conjunction with a free-from statement for the same allergen. For example: "May contain milk" should not be used in combination with "dairy free".

IFST would recommend that in addition to free from 'x' this guidance should also extend to cover the descriptor 'vegan' which may otherwise be taken to mean the guaranteed absence of milk, egg, fish, shellfish or any other animal protein.

- FBOs should provide a straightforward means for consumers to contact them about their allergen cross-contact risk assessment that informs PAL. This contact information should be provided on pack or at point of sale. This is of particular importance for consumers with multiple/severe allergies who are concerned about a labelling change.

IFST would also like to understand whether specific guidance on what information should be available to consumers regarding the cross-contact risk assessment will be prepared by FSA? This guidance would need to ensure that information is provided by FBOs in language that a non-technical consumer, or food business operator can understand and act upon.

**No Gluten Containing Ingredients (NGCI) Statements**

IFST agrees with and supports the proposed FSA guidance that NGCI Statements should not be made.

IFST assume that this guidance would also preclude the use of the term 'suitable for coeliacs'. Can FSA confirm and clarify this point?

**Pre-Packed Food for Direct Sale**

IFST agrees with and supports the FSA clarification of the duty of food businesses to label PPDS food with the name of the food and a full list of ingredients, that emphasises any of the 14 regulated allergen groups, as required by law.

**Legislative references**

IFST agrees with and supports the legislative references to ensure that references to EU legislation are reflective of the current GB/NI legislative landscape.

Thank you again for consulting on this important topic.

Yours faithfully,

A handwritten signature in purple ink, appearing to read 'S French'.

Stephen French, Ph.D.  
Scientific Policy Director, Institute of Food Science & Technology

