

# Precautionary Allergen Labelling Report and Non-Gluten Containing Ingredients Labelling Report

Area of research interest: [Food hypersensitivity](#)

Study duration: 2021-08-01

Project status: Completed

Conducted by: Basis Social and Bright Harbour

Date published: 6 June 2022

DOI: <https://doi.org/10.46756/sci.fsa.dxq232>

## Aims

Precautionary allergen labelling (PAL) and precautionary allergen information aims to communicate whether one or more of the fourteen allergens regulated in the UK could be unintentionally present in a food product - for example, via 'may contain' or 'produced in a factory which' statements.

This research explored experiences, interpretations, and views of PAL with businesses and consumers with food hypersensitivities in order to understand and improve how it is applied in future. In addition, the FSA conducted qualitative research with coeliac consumers on experiences, interpretations, and views of NCGI (non-gluten containing ingredients) notices. This research was conducted in tandem with wider research on precautionary allergen labelling (PAL) notices but has been reported separately given the different information provided by PAL and NCGI.

## Methods

The research included qualitative interviews with 62 small and medium (SME) sized businesses and 30 consumers with food hypersensitivities (FHS) (either themselves or they cared for children with FHS) exploring use and attitudes to precautionary allergen labelling (PAL). There was also co creation work and testing with consumers developing concepts to improve the experience of PAL.

In addition, qualitative research was undertaken with 15 coeliac consumers to explore experiences and understanding of NCGI statements. All participants either had coeliac diagnoses themselves or cared for children who were diagnosed with coeliac disease.

### Key findings on PAL

For consumers, PAL is commonly mis-interpreted or found too difficult to interpret, with 'may contain' PAL, in particular, found to be too vague to support informed decision making. Consumers assume that PAL is mandatory, which is problematic as they think the absence of a PAL has been considered and that therefore a product is free from cross-contamination risk.

SME participants tended to think about PAL and allergen labelling generally as part of their wider food hygiene management. These general hygiene management processes were seen as adequate to manage allergen cross-contamination risks. At present formal risk analysis is

typically not undertaken by SMEs. A central problem with PAL related to a lack of common standards guiding when it should be used, and a lack of an easy and inexpensive means of measuring thresholds to support assessment.

## **Key findings on NCGI statements**

Coeliac consumers found NCGI statements highly confusing. The phrase 'non-gluten containing ingredients' was perceived as unclear across the sample, including by highly knowledgeable participants.

Although some coeliac consumers understood NCGI notices and menus as flagging potential cross-contamination risk, others mis-interpreted these as meaning 'gluten free.' This raised risk of harm for coeliac consumers, who may interpret NCGI notices as a 'green light' that foods are safe for them, without considering cross-contamination exposure risk.

## **Research reports**

### **England, Northern Ireland and Wales**

PDF

[View Precautionary Allergen Labelling FBO Report as PDF\(Open in a new window\)](#) (999.08 KB)

### **England, Northern Ireland and Wales**

PDF

[View Non-Gluten Containing Ingredients Labelling Report as PDF\(Open in a new window\)](#)  
(556.51 KB)