

FOOD HYPERSENSITIVITY STRATEGY

Report by Rebecca Sudworth, Director of Policy

For further information, please contact Alice Teague, Programme Manager, on alice.teague@food.gov.uk.

1. Summary

- 1.1 This paper updates the Board on current and planned activities to establish and deliver the FSA's Food Hypersensitivity Strategy, including implementation of new allergen labelling requirements for food pre-packed for direct sale (PPDS).
- 1.2 The Board is asked to:
 - **comment** on the strategic framework and provide guidance on the proposed vision, objectives and activities; and
 - **review** progress against current priorities.

2. Introduction

- 2.1 The FSA's work on food hypersensitivity is a strategic priority for the FSA. Following the extraordinary Board meeting in May 2019 we have been developing an overarching Food Hypersensitivity Strategy that will bring together the work of the FSA with partners inside and outside government to lead and focus a programme of work to achieve a step change in how food hypersensitivity is understood and managed.
- 2.2 The development of our strategic approach is occurring in tandem with the delivery of a number of priority work areas the Board has previously considered, for example the new allergen labelling requirements for foods pre-packed for direct sale (PPDS). Food hypersensitivity is not a static area – our strategic approach requires agility so that we are able to deliver our priority work areas, but also remain responsive to new evidence and opportunities.
- 2.3 This paper:
 - **Presents the proposed strategic framework** for the Food Hypersensitivity Strategy;
 - **Summarises the vision, objectives and activities** incorporating both current and future work;
 - **Updates the Board on progress against current priorities**, including progress on the implementation of the new PPDS labelling requirements.

3. Strategic Framework

Our ambition

- 3.1 In May 2019 the FSA Board endorsed a long-term ambition that the UK should be the best place in the world to be a food hypersensitive consumer. Achieving this ambition will require a sustained and coordinated strategic approach over a long period of time.
- 3.2 We believe that the UK is already a good place to be a food hypersensitive consumer. But we need to understand much more about what it would mean to be the best. As we develop our metrics and performance measures we will look at best practice in other countries and consider how we can better define our ambition and measure progress towards it.

FSA leadership role and scope of strategy

- 3.3 Food hypersensitivity is a priority for the FSA because it is a significant food-related health issue in the UK that has a severe and enduring impact for people with a food hypersensitivity. Our initial work to estimate and quantify this impact using a Cost of Illness approach suggests that food hypersensitivity has a greater economic and financial impact than for all foodborne diseases.
- 3.4 The FSA is recognised as a leader in the field and we will use our capacity and experience to work in partnership with stakeholders inside and outside government to achieve our strategic objectives. We will achieve our strategic objectives through:
- **direct delivery** of actions that fall within the FSA's remit;
 - **indirect delivery and partnership working** where actions and initiatives owned by partners inside and outside government have been identified as critical to achieve our objectives;
 - **leadership and influencing** so that food hypersensitivity is recognised as a priority and to encourage innovation, investment and information sharing.

Partnership working

- 3.5 Food hypersensitivity is a national and global issue. We are taking a four-country approach to the FH Strategy, with representatives from Northern Ireland, Scotland and Wales on the Programme Board. The Welsh Food Advisory Committee and Northern Ireland Food Advisory Committee have considered allergies at their open meetings, helping to ensure that a range of stakeholder perspectives across the four nations are fed into our work.
- 3.6 Internationally, the UK continues to play an active role in the work of Codex Alimentarius, the global organisation that sets international food standards, guidelines and codes of practice. In September, Codex Committee on Food Hygiene (CCFH) progressed a Code of Practice on Food Allergen Management for Food Business Operators to Step 8 for final critical review before publication. The UK has supported and contributed to this work and will continue to work

through CCFH and Codex Committee on Food Labelling to lead and influence the development of international standards and best practice.

- 3.7 We are currently considering how best to involve and engage partners inside and outside government. This is likely to include both a cross-government steering group and an external stakeholder group. Following the Board's consideration of our strategic approach we will undertake further engagement and consultation in the new year.

Science and evidence

- 3.8 The FSA has an established programme of research to inform our work on food hypersensitivity. The FSA's Science Council has established a sub-group to support this strategic priority for the FSA. The sub-group will provide oversight, advice and assurance in the following areas:

- A review of the science and evidence base to inform future prioritisation;
- Horizon scanning to identify new and emerging issues;
- FSA capacity and capability to make best use of science and evidence (this builds on previous Science Council work in this area and will use food hypersensitivity as a case study to ensure recommendations are implemented effectively).

4. Vision, Objectives and Activities

Vision and objectives

- 4.1 To support the delivery of the Board's ambition we have developed a specific vision for the FH strategy and programme. The vision has been developed following a series of cross-FSA workshops and discussions, and places consumers at the heart of what we want to achieve.

'To improve the quality of life for people living with food hypersensitivities and support them to make safe and informed choices to effectively manage risk'.

- 4.2 This vision will be delivered through a set of objectives which have been grouped into three strategic themes:

Safety

- Consumers have accurate, easily understandable information needed to make safe and informed food choices and effectively manage risk.
- Food businesses understand their responsibilities and embed management of hypersensitivity in a strong food safety culture.
- We improve understanding of the causes and impact of allergen incidents and adverse reactions.

Trust

- Consumers trust the allergy information provided to them and use this to make informed decisions to effectively manage risk.
- Consumers trust that effective enforcement action is taken.

Choice

- There is better public understanding and acceptance of food hypersensitivity, leading to improved choice and inclusion.
- Hypersensitive consumers have access to a wide range of food products and services including eating out safely.

4.3 Appendix 1 provides more detail about the activities planned under each strategic theme, and the programme approach.

Timing and phasing

4.4 The strategy is being developed using a phased approach, with an initial five-year planning horizon:

- **Phase One** (until March 2021)

In this phase we will develop and embed the strategic approach, deliver current priorities such as implementing the PPDS labelling requirements and further public awareness campaigns for business and consumers, and work with the FSA's Science Council to undertake a comprehensive review of the science and evidence base to identify any gaps. We will also develop the metrics needed to measure the impact the FSA's work is having (for example, further work on the Cost of Illness model).

- **Phase Two** (until March 2024)

This phase will be informed by the outcomes of the review of the science and evidence base. It is likely to include commissioning of new research, further developments in the provision of information to consumers (for example implementing recommendations from work on precautionary statements) and delivery of our chosen approach to allergic reaction reporting following scoping and development undertaken in Phase One.

- **Evaluation and review**

Evaluation and performance measurement will be built in from the start of the programme. Further work will be required as part of Phase One to establish appropriate baseline information in order to measure impact. At the end of the five-year period we will decide whether a further phase of the strategy is required and/or which aspects of the work can be embedded into business as usual.

5. Progress Against Current Priorities

Implementation of the PPDS labelling requirements

- 5.1 As set out in the September Board update paper, FSA officials engaged with industry, local authority and consumer stakeholders over the summer to develop guidance to support implementation of the new PPDS labelling requirements.
- 5.2 In early October it was decided to extend this period of engagement following representations from businesses who wanted to clarify the impact on their specific business models and that guidance reflecting the new requirements would be provided by the end of 2019 in the form of updates to the FSA's Allergen Labelling Technical Guidance. These updates will help businesses and local authorities understand the scope of the changes and work towards implementing the new requirements ahead of them coming into effect on 1 October 2021.
- 5.3 Following a short delay due to the General Election, a consultation on the updated Technical Guidance will be launched in January 2020.
- 5.4 An update on progress against other current priorities is at Appendix 2.

Appendix 2: Progress on current priorities

| PRIORITY DEC 2019 – MARCH 2020 | PROGRESS AND NEXT STEPS |
|--|---|
| Shape and prioritise longer-term strategy | <ul style="list-style-type: none"> • Vision, objectives and key workstreams developed autumn 2019 • FSA-wide programme established and funding secured for key activities – funding strategy for Phase One to be finalised as part of FSA business planning • Board to consider strategic approach |
| Deliver PPDS labelling requirements | <ul style="list-style-type: none"> • The Defra Statutory Instrument was laid before Parliament on 5 September 2019 and will come into force in Autumn 2021. The SIs in Northern Ireland, Scotland and Wales have yet to be laid but are scheduled to come into force within the same timescale. • Engagement with FBOs, consumers and representative organisations to communicate new requirements and prepare for implementation is ongoing and will continue throughout 2020. • Updates to FSA Allergen Labelling Technical Guidance for food businesses and local authorities reflecting the new requirements. Consultation in January 2020. • Commission, review, refresh and release allergy e-learning module by June 2020. |
| Initiate project to deliver food allergic reaction ('near miss') reporting tool | <ul style="list-style-type: none"> • Discovery phase began at the end of November 2019 to be completed around the end of February 2020, currently conducting user and stakeholder research to inform the recommendations at the end of the Discovery Phase. |
| Publish revised 'Safer Food Better Business' (SFBB) guidance for FBOs | <ul style="list-style-type: none"> • SFBB has been revised to incorporate the changes for PPDS foods. The updated guide has now been published. A more comprehensive review will take place during 2020. |

| <p>PRIORITY DEC 2019 – MARCH 2020</p> | <p>PROGRESS AND NEXT STEPS</p> |
|---|--|
| <p>Consolidate guidance for local authorities and publish a new aide-memoire to ensure clear and consistent approach to inspection</p> | <ul style="list-style-type: none"> • An initial draft has been designed and work will be taken forward in consultation with local authorities. |
| <p>Prioritise and commission future research programme in support of longer-term strategy</p> <p>Deliver ongoing research programme</p> | <ul style="list-style-type: none"> • Science Council has approved Terms of Reference for review of evidence base. Funding secured and commissioning underway. • Funding has been approved for the next stage of work to develop the Cost of Illness Model to incorporate food hypersensitivity. • Social science research to provide a baseline measurement of business understanding of the new requirements for PPDS. The study will also provide a measure of business uptake and understanding of allergen labelling rules in general to inform a post-implementation review of the food information regulations. |
| <p>Communications and engagement</p> | <ul style="list-style-type: none"> • Parliamentary reception October 2019 with allergy and food intolerance a key theme. • Takeaway Expo November 2019 – key trade event at which FSA took a stand to promote the new PPDS rules and broader messages on allergy and food intolerance. • Development of next wave public and industry awareness campaign – starting with campaign for business in early 2020. • On-going engagement with industry, enforcement agencies, representative bodies, consumers and affected families to inform future strategy and implementation of PPDS labelling requirements. • Preparations being made for the next industry leadership group meeting. • Symposium on Food Allergy 25th Feb 2020. |