

## Food hypersensitivity strategy Report by Rebecca Sudworth, Director of Policy

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### 1. Summary

1.1 This paper is the quarterly report to the Board on current and planned activities to deliver the FSA's Food Hypersensitivity Strategy, including implementation of new labelling rules for food pre-packed for direct sale (PPDS).

1.2 The Board is asked to **review** progress against current priorities.

### 2. Introduction

2.1 The FSA's work on food hypersensitivity is a strategic priority for the FSA. At the Board meeting in January 2020, the FSA Board approved a new strategic framework that sets out the ambition, objectives and main areas of delivery for the new Food Hypersensitivity Strategy. Following Board approval of the approach, we are now completing set up of the programme to deliver the strategy, having secured additional resourcing for this work as one of the FSA's main strategic priorities for 2020.

2.2 This paper updates the Board on progress against current priorities, including:

- implementation of the new rules for allergen labelling on foods pre-packed for direct sale (PPDS);
- plans for business and consumer awareness and information campaigns during 2020;
- a report on the Allergy Symposium held on 25<sup>th</sup> February 2020 [paper to be updated following the event]

2.3 **Appendix 1** provides more detail about current and planned activities and outputs.

### 3. Implementation of the PPDS Labelling Requirements

3.1 A six-week consultation on updates to the FSA allergen labelling technical guidance was launched on 23 January and will close on 6 March. The updates to the guidance are principally to reflect the new legal requirements, but we have also taken the opportunity to propose some other technical/drafting changes. Plans are being developed for a series of workshops to help businesses and local authorities understand the new requirements.

3.2 We are continuing our ongoing engagement with industry bodies and business representatives to understand the range of business models, how industry is

preparing to meet the new requirements and what further support would be helpful.

#### 4. Plans for Business and Consumer Awareness Campaigns During 2020

- 4.1 In 2018 the FSA ran an allergy awareness campaign called 'Easy to Ask', which was both consumer and business facing. The campaign urged young people to 'Ask about allergies' and sought to remind food businesses of their legal obligations. Appendix 2 provides a summary of this work.
- 4.2 While the campaign was award-winning, garnered extensive media coverage and our content was widely shared by partners, the learnings of post-campaign testing told us that the campaign tried to address too many different audience groups, but didn't work hard enough for either. Both audiences also gave us permission to be braver, bolder and more directive.
- 4.3 We have used this insight to inform a new strategy for our allergy campaigning, creating separate campaigns to reach our target audiences (food businesses and young people) in a more tailored and impactful way.
- 4.4 Our aims are:
- **for food businesses:** to increase food businesses' knowledge of and compliance with the food allergen rules and to normalise answering of questions about ingredients;
  - **for young people:** to highlight the risks of not speaking out about food allergies and to normalise the conversation amongst peers at points of purchase and consumption.
- 4.5 We have tested different concepts with businesses in England, Wales and Northern Ireland and will deliver a three-pronged approach to campaigning, with the first wave launching in March 2020:
- **a campaign specifically targeting owner/manager/decision makers** - leveraging the business impact of not providing accurate information, encouraging them to get systems in place and train staff. This will include social media advertising and media partnership specifically targeting SME food business managers. We are working with key trade partners such as the Nationwide Caterers Association, TUCO (an association of in-house catering organisations) and the British Sandwich Association who are actively engaging with their members on the issue. Our specific target for this phase of activity is to increase traffic allergy business food.gov.uk by at least 30%<sup>1</sup>
  - **a 'front-of-house' campaign** – encouraging this audience to empathise with the customers they are serving and to take requests for allergen

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<sup>1</sup> From 1<sup>st</sup> – 30<sup>th</sup> Nov 2019 the allergy guidance page received 35,275 views.

information seriously. This will focus on the human impact of allergic reactions.

- and, in summer 2020 when food businesses are more prepared, a **campaign targeting young people**, reminding them of the importance of asking for allergen information.

## **5. Report on the FSA Allergy Symposium 25<sup>th</sup> February 2020**

- 5.1 The first FSA Food Allergy Symposium was held on Tuesday 25th February. The event was opened by the FSA Chair, Heather Hancock, and saw over 100 delegates from key food industry sectors, local authority enforcement, clinical allergists and allergy consumer groups. The aim was to gather and galvanise partners from both inside and outside Government to showcase best practice, raise awareness and deliver change that would improve the lives of the food hypersensitive consumer.
- 5.2 Delegates heard first-hand experiences from people living with or caring for those with food allergy, as they described the impact on quality of life and the need for empathy and kindness. Experts spoke on a range of subjects including understanding the causes and diagnosis of allergies and the importance of reporting and acting on incidents to keep people safe.
- 5.3 Speaker panels dealt with thought provoking and lively questions, while interactive workshops gave attendees the chance to discuss important issues such as who was responsible for keeping people safe when eating out, systems for managing allergen information, reporting of allergen incidents and the enforcement of allergen control.
- 5.4 The FSA is currently collating the lessons learned and action points arising from the day and will use these to inform the development of the Food Hypersensitivity Strategy. Outputs will be shared with participants and stakeholders. More information is available on the FSA website at <https://www.food.gov.uk/news-alerts/news/food-allergy-symposium-brings-industry-enforcement-and-consumers-together-for-the-first-time> including feedback from participants.

Appendix 1: Current and planned activities and outputs

Priority Jan – March 2020	Progress and next steps
<p><b>Shape and prioritise longer-term strategy</b></p>	<ul style="list-style-type: none"> <li>• Board approved strategic framework January 2020.</li> <li>• Programme set up underway – additional resources secured as a strategic priority for 2020 and beyond. Recruitment to new team underway.</li> <li>• Preliminary Gate 0 took place in December 2019 – actions underway to address recommendations.</li> <li>• Developing outline business case and funding bid for next Spending Review to support strategy from 2021 onwards.</li> </ul>
<p><b>Deliver outcome of Allergen Labelling Review</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Engagement with FBOs, consumers and representative organisations to communicate new requirements and prepare for implementation is ongoing and will continue throughout 2020.</li> <li>• Technical implementation guidance for food businesses and local authorities published for consultation 23 January 2020</li> <li>• Review responses and finalise guidance, work with representative bodies on sector-specific guidance</li> <li>• Commission, review, refresh and release allergy e-learning module by June 2020.</li> </ul>
<p><b>Initiate project to deliver ‘near miss’ reporting tool – now known as the Food Allergic Reaction Reporting Mechanism</b></p>	<ul style="list-style-type: none"> <li>• The Discovery Phase for this project will be completed in March 2020. A wide range of different options are under discussion which could be implemented alone or in combination. These include a stand-alone reporting tool owned by the FSA, mechanisms for acquiring data directly from external partners such as Food Businesses, Local Authorities and/or the NHS, and obtaining information via regular and targeted consumer surveys.</li> </ul>
<p><b>Consolidate guidance for local authorities and</b></p>	<ul style="list-style-type: none"> <li>• Work on this is at an early stage and will be taken forward in consultation with local authorities.</li> </ul>

Priority Jan – March 2020	Progress and next steps
publish a new aide-memoire to ensure clear and consistent approach to inspection	
Consider options to provide ‘at a glance’ information on allergen management through FHRs or similar scheme	<ul style="list-style-type: none"> <li>• New project to be established Q1 2020 once resources in place following recruitment</li> <li>• Work underway to provide updated guidance to Local Authorities about how the existing FHRs scheme applies to allergen management</li> </ul>
<p><b>Prioritise and commission future research programme in support of longer-term strategy</b></p> <p><b>Deliver ongoing research programme</b></p>	<ul style="list-style-type: none"> <li>• As part of the Science Council sub group work on the evidence base and future strategic direction for research in this area, we have developed a Priority Setting Exercise (PSE) process inspired by the James Lind Alliance Priority Setting Partnerships. The PSE is comprised of a public survey launched in late February, data analysis and prioritisation workshop to identify the top 10 key research-focused questions the public feel the FSA should be answering in regards to Food Hypersensitivity.</li> <li>• Fieldwork has commenced for the social science research project measuring business uptake and implementation of allergen labelling rules, as well as awareness of the incoming requirements for PPDS. The project is on track to report by Autumn 2020.</li> <li>• Research to capture and evaluate the burden associated with the management of food hypersensitivities is beginning, working with a consortium of academics led by Aston University.</li> </ul>
<b>Communications and engagement</b>	<ul style="list-style-type: none"> <li>• Development of next wave public and industry awareness campaign – starting with campaign for business in early 2020.</li> <li>• On-going engagement with industry, enforcement agencies, representative bodies, consumers and affected families to inform future strategy and implementation of outcome of Allergen Labelling Review.</li> <li>• Preparations being made for the next industry leadership group meeting.</li> <li>• Symposium on Food Allergy 25<sup>th</sup> Feb 2020.</li> </ul>

## Appendix 2: Summary of the Easy to ASK campaign



In 2018/19, working in partnership with Allergy UK and the Anaphylaxis Campaign, we launched the #EasytoASK campaign. The campaign focussed on building the confidence of the young allergic consumer (16-24) when eating out of the home, as well as encouraging food businesses to comply with allergen information requirements and make it easy for young (vulnerable) customers to ask for allergen information

It launched during 'Freshers' month' when many young people are likely to be leaving home and eating independently for the first time, as well as moving into new and unfamiliar peer groups.

### **What we achieved**

- The campaign won the Government Communications Service (GCS) Campaign of Month (November 2018) and the PRCA Dare Public Sector Award Northern Ireland and was nominated for three other awards.
- It featured across 64 trade, media, broadcast and press outlets, offering 91.5 million opportunities to see and reaching 57% of UK adults, with 100% positive coverage.
- Our media partnership with FOODBible resulted in the best performing branded video on their Instagram channel for that month.
- Paid for Instagram content achieved an above average click through rate (CTR) of 0.51% (average is 0.3%) and our organic Instagram content came in at 4.33, double that of the same period the previous year.
- The campaign was supported by 28 trade partners and nine universities.
- Visits to the FSA consumer and business web pages increased by 25% and 31% respectively.