

## What does “may contain” mean to the food-allergic consumer?

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## Allergen warnings on packaged food

“the warning that the cornflakes “may contain traces of peanuts” is a good thing for people with nut allergy but what do they mean “may contain”? Don’t they know? Is there someone at their plant randomly tossing peanuts into some packets and not others?”

Bill Ralston, the Listener, August 2008



## The food-allergic consumer

- Must assess risk of allergen presence every time they eat
  - Packaged food
  - Food preparation
  - Eating out
  - Social occasions



## Food-allergic consumers

- Newly diagnosed (young children)
  - Often very anxious and protective parents
  - Varying medical advice regarding avoidance
- Older children
  - Starting to take responsibility – making their own choices
- Teenagers and young adults
  - More independent
  - May take risks
- Adults
  - Less likely to have regular medical checks
  - May not have emergency medication prescribed



## Food-allergic consumers

- Extreme anxiety
- Fear of reaction (death)
- Lack of trust in others
- Or may be blasé about risk
  - Ignore warning statements
  - Don't carry medication
  - Don't tell companions
  - Poor communication with food service outlets
- Or somewhere in between!



## The newly diagnosed

- May have no comprehension at all of food manufacturing processes
- May not have had access to specialist allergy services or dietitian
- Variable advice from health professionals about risk from products featuring allergen warnings



## Regulatory requirements

- Many consumers confused over mandatory declaration vs voluntary use of allergen warning statements
- Some manufacturer call centres state that they are required to use a warning if there is a risk of allergen presence
- Many people remain confused over this issue



## US FDA report

- Currently consulting on developing a long-term strategy to assist manufacturers to use advisory labelling that is truthful, not misleading, conveys a clear and uniform message and adequately informs food-allergic consumers



## FDA Report – consumer research

<http://www.cfsan.fda.gov/~1rd/fr080808.html>

- 1. “Allergy Information: May contain peanuts”
  - Preferred statement
- 2. “May contain peanuts”
- 3. “Manufactured on same equipment as foods that contain peanut”
- 4. “Produced in a facility with an allergy control plan. The possibility of contact with allergenic ingredients has been minimized. May still contain traces of peanut”



## FDA Report – consumer research

<http://www.cfsan.fda.gov/~1rd/fr080808.html>

- Participants thought statements 1 and 2 indicated that these foods were more likely to contain peanut
- Statements 3 and 4 less likely to contain peanut

[note research focused on peanut only]



## FDA Report

- Food Allergy & Anaphylaxis Network consumer research
- Consumers increasingly ignoring advisory labelling
- Examined retail packaging bearing warnings and analysed products = detectable residue in some products indicating consumers are risking health by consuming products with warnings



## What do our members say?

- “We like the type of labelling "Produced in a facility also handling \_\_\_\_" or "Produced on equipment also handling \_\_\_\_" because it gives guidance to the level of risk”.
- “There are a large number of products with these warnings now and wonder if companies are just putting it on as a disclaimer.....just in case. I generally still allow these products, but if she has a reaction I know to not give that product to her again”



“After several severe anaphylactic reactions we do not ignore “may contain” warnings.

We really appreciate companies who make the effort to label their products carefully and not overuse warnings”.



“I'm still not 100% clear on the legal requirements or industry guidelines about declaring traces of allergens. To me, the safest products are those which have an allergen notice like 'Contains milk and soy' but nuts are not mentioned. If there is no allergen notice at all, I often steer clear on the basis that no allergen information at all amounts to incomplete labelling”.



“I always avoid a product if it features a nut trace warning. I would like to see all manufacturers advising us so we can make our own decisions. If in doubt I will phone a company to ask their procedures, but I find this difficult sometimes as you have to lay your trust in a person who is on the other end of the phone, who may not realise the full extent of your questions”.



“It simply means to us that it may contain the allergens we are avoiding for our daughter so we don't buy it. In other words "danger, keep away!”.

“To be honest I always read the list of ingredients because quite often the 'may contain' allergen is listed as a main ingredient!”





“ ‘May contain traces’ is just too vague. I need specific information, for example ‘processed on equipment that also handles products containing ....’ ”



## Warning example

- “Contains Wheat and soy. May contain peanut and nuts. Produced on equipment also handling egg and sesame”
  - Which of the two warnings indicates a higher level of risk?

## Allergy NZ's view

- Regulatory silence on allergen warning statements is not helpful
- Patients, health professionals and the food industry need clear, consistent guidance on use of allergen warnings and the implications for consumers
- We support VITAL in principle
  - Need for ongoing monitoring
  - Need for logo or similar to indicate use of allergen management policy
  - Need for consumer education

