



Just a Little Nuts!

Revisions to allergen labelling

The nuts and bolts of how to declare a list of ingredients is governed by the Food and Drug Regulations (FDR). This April, Health Canada announced that it was ready to recommend proposed regulations to change the labelling requirements for priority allergens, including gluten and sulphites. These proposed regulations may appear in the Canada Gazette I by as early as mid-2004. The best way to describe the changes is as significant but not overly complex. Those who have been faithful to the policy on allergen labelling should not be overwhelmed by the labelling transition.

For the past decade ingredient list labelling has been governed by regulations and allergen labelling policies, which in some cases conflict with each other. For example, B.01.009 of the FDR exempts certain ingredients from the declaration of components whereas the latest allergy labelling policy, based on the 1998 Project 19 Consultation, would require the declaration of allergens. Amendments to the FDR added requirements to declare peanut oils in any ingredient that would otherwise be exempt from the declaration of components. In 2000 a requirement was added to declare lysozyme from eggs as a component of cheese.

The priority allergens include peanuts, tree nuts, sesame, milk, eggs, fish, crustaceans, shellfish, soy, wheat, spelt, kamut, oats, barley, rye, triticale or any protein derivative of these. The proposed regulations would see that where any of the priority allergens or protein derivatives are present in a food, that they be declared regardless of any other exemptions and be identified as to their origin (e.g. "casein (milk)").

The plant sources of all hydrolysed plant protein would be identified, as would that for lecithin and all forms of starch ingredients, including modified starches and maltodextrins. Sulphites will be required to be declared in all ingredients

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that would otherwise be exempt from the declaration of components if present in the finished food at a level of 10 ppm or more. Ingredients not exempt from the declaration of components would need to be declared in the presence of sulphites regardless of their level in the food. Here it would have been simpler if Health Canada had implemented the 10 ppm rule to all foods.

Products currently exempt from bearing a label or from the declaration of an ingredient list would be excused from the allergen regulations. However, the main panel of a food that is a standardised alcoholic beverage or vinegar will need to identify any priority allergens and sulphites when present at a level of 10 ppm or more whether they are added directly or indirectly.

This current regulatory initiative does not specifically address statements that are now voluntarily appended to the ingredient list that identify potential allergens that may be present in the product as a result of cross contamination, for example, "may contain peanuts." For the sake of clarity it may have made sense to include a requirement following the ingredient list that simply identifies the priority allergens and sulphites. Those who have kids who can't bring foods contain-

ing peanuts to school know the challenges in reading a list of ingredients while shopping, regardless of how complete the ingredient list is.

Recent advances in analytical methods for the detection of priority allergens have likely rekindled allergen labelling. The proposed regulations would only be a step forward in tidying up the existing regulations.

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