

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 I-029

Council Recommendation: Accepted as Submitted _____ Accepted as Amended _____ No Action _____

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

Labeling for Food Allergen Cross-Contact

Issue you would like the Conference to consider:

Adding an addendum to the 2013 FDA Food Code subparagraph 3-602.11(B)(5) to include a statement on a product's label, when applicable, that cross-contact with specifically named allergens is possible.

Public Health Significance:

Consumers assume that delis, bakeries, grocery stores, restaurants, and other venues that sell pre-packaged foods (i.e., foods NOT produced and packaged in manufacturing plants that fall under the provisions of the Food Allergen Labeling and Consumer Protection Act, FALCPA) are labeled as stringently for the presence of allergens as manufactured products, and also assume that these venues practice strict allergen control. Because the labels seldom indicate the potential presence of allergens due to cross-contact, reactions have occurred, including food anaphylaxis deaths.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that subparagraph 3-601.11(B)(5) of the 2013 Food Code be amended as follows (language to add is underlined):

3-601.11 Food Labels.

(B) Label information shall include:

(5) The name of the FOOD source for each MAJOR FOOD ALLERGEN contained in the FOOD unless the FOOD source is already part of the common or usual name of the respective ingredient.^{Pf} When applicable, all pre-packaged items will have a label stating that the food may have been in contact with allergens specifically named by the venue preparing and/or packaging the product.

Submitter Information:

Name: Nona Narvaez
Organization: Anaphylaxis and Food Allergy Association of MN (AFAA)
Address: 2200 Hendon Ave
City/State/Zip: St. Paul, MN 55108
Telephone: 6516445937
E-mail: nona@minnesotafoodallergy.org

Supporting Attachments:

- "Suit in Allergy Death: Should Store Bakeries Have to Label? (redacted)"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.