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Building a framework to help define tolerable risk in food allergy

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KEY MESSAGES

- Unintended allergen presence in foods poses a risk to people with food allergies
- The rationale and values underlying decisions about what risk is tolerable in food allergy are not clear
- This lack of clarity has hindered definition of appropriate risk benchmarks for food allergens, leaving people with food allergies frustrated and not knowing when to trust that foods are safe for them
- The ILSI-Europe Food Allergy Task Force has assembled an Expert Group to develop a framework to help multiple stakeholders reach consensus on tolerable risk with transparency

Background

- Food allergy is the daily reality for at least 20 million Europeans (more if including their families, colleagues, etc)
- People with food allergy are a well-defined group who need accurate information on food contents to keep themselves safe from anaphylaxis
- The law protects them well against exposure to allergenic ingredients, but not to unintended allergen presence (UAP)
- Precautionary allergen labelling (PAL) aims to mitigate the risk from UAP, however there are no clear rules on whether and when to use PAL
- There is therefore no general, agreed risk level that triggers use of PAL and people with food allergies are left frustrated, confused and are potentially placed at risk
- Healthcare practitioners are unclear about what advice to give about which foods are safe and which aren’t
- Additionally food businesses face unnecessary uncertainty
- Methods now exist which permit the effective derivation of transparent, risk-based benchmarks, all founded on human data

Who, What and How?

- **WHO needs to be involved?**
  - Decision makers e.g. regulators, food business operators (FBOs)
  - Those bearing the consequences of the decision(s) e.g. people with food allergies, care givers, food businesses

- **WHAT must the framework ensure?**
  - All relevant factors are considered: data inputs are accurate and accessible
  - Concrete, practicable and theoretically justified information is used and conclusions are reached on what types of action to take (or not)
  - Transparent value judgements and methods are applied
  - Description of the societal distribution of the risks
  - **HOW should the framework operate?**
  - The main criterion is transparency and inclusion of all relevant views

Understanding the Current Landscape: Outcomes from a Workshop Session with Stakeholders on Tolerable Risk and Food Allergy

- **Can we compare food allergy risk to other accepted food related risks?**
  - Yes, an appropriate, well-matched benchmark is critical
  - Need to reflect that risk only applies to a subpopulation
- **Acceptable risk and cost versus suffering**
  - Different elements of risk assessment have distinct uncertainties:
    - Difficult to define costs
    - Costs may not increase if PAL is harmonized
    - Cost increases may threaten economic viability for some FBOs
  - If PAL will be regulated then cost of suffering for allergic consumers will be reduced: the perception is yes but there is no evidence for that...

References


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ILSI Europe fosters collaboration between the best scientists from industry, academic and public sectors to provide scientific consensus on nutrition and food safety that improves public health.