

P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies

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Introduction

Petition Number: P-06-1531

Petition title: Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies

Text of petition: Imagine navigating daily life knowing that one wrong bite could jeopardise your health or the health of someone you love. For my son, and countless others worldwide, this is a constant reality. He has a severe allergy to potatoes—an ingredient that often hides behind vague terms like "starch" on food labels, and sometimes not labelled at all.

The lack of clear, specific labelling poses a serious risk. This is more than a matter of convenience; it's about safety and the right to make informed choices about what we consume. Every consumer deserves to know exactly what ingredients are in their food.

Empowering consumers with accurate information protects not only those with dietary restrictions but also fosters trust and accountability in the food industry.



Join us in advocating for change. Sign this petition to mandate detailed and specific food labelling. Together, we can create a safer and more inclusive food landscape for everyone.

The text provided above is submitted by the petitioner. The petitions team make every effort to ensure it preserves their authentic voice. This text has not been verified for accuracy, or errors, and may contain unverified opinions or assertions.

Mae'r testun uchod yn cael ei gyflwyno gan y deisebydd. Mae'r tîm deisebau yn gwneud pob ymdrech i sicrhau ei fod yn cadw ei lais dilys. Nid yw'r testun hwn wedi'i wirio am gywirdeb, neu wallau, a gall gynnwys barn neu honiadau heb eu gwirio.

1. Background

Legislative competence

Paragraph 80 of [Schedule 7A](#) to the Government of Wales Act 2006 provides that labelling of “food, food products and food contact materials” are within the competence of the Senedd.

Due to the [mutual recognition principle for goods](#) provided for in the Internal Market Act however, the Senedd would be unable to enforce its own food labelling requirements on goods lawfully produced and labelled in other parts of the UK. For this reason, any new requirements for food labelling made by the Senedd would apply only to goods produced in Wales and not those originating in other parts of the UK.

Current legislation on food labelling

Legislation on food labelling is largely derived from assimilated EU law, in particular [Regulation \(EU\) No 1169/2011](#), more commonly known as the Food Information to Consumers (FIC) Regulation. In Wales, these regulations are enforced by [The Food Information \(Wales\) Regulations 2014](#). The [Food Standards Agency](#) (FSA) is responsible for implementing these regulations and for providing advice to the Welsh Government on food safety and standards.

The regulations provide that all [prepacked food](#) and food [prepacked for direct sale](#) must list ingredients in descending order of weight using the legal name of the ingredient. Where a legal name is not available, a customary name must be used. Foods with legal names are those with certain properties defined in law (for example, [glucose syrup](#)). Customary names are those which are widely understood and accepted by consumers without the need for further explanation.

Where a legal name or customary name is not available, a descriptive name must be used which accurately describes the ingredient.

If any one of **fourteen major allergens** are present in the food, this must be clearly emphasised in the list of ingredients. This can be by a change in font or style, such as capitalising the allergen or using bold text. Allergens must be indicated using a customary name (for example, 'milk' added in brackets after 'whey' or 'casein'). If an allergen is part of a certain group, the specific variety must be named (for example, 'almonds' as opposed to 'nuts').

If an allergen is not one of the fourteen regulated allergens, it is not subject to these requirements. Since potatoes are not included in the list of regulated allergens, there is no legal requirement to declare if an ingredient has been derived from them.

Unclear food labelling

It may not always be clear to the consumer where an ingredient has come from if it does not belong to one of the fourteen regulated allergens. Some organisations, including [Allergy UK](#) and [BSACI](#), have highlighted unclear labelling of ingredients derived from certain legumes (particularly peas) as a growing problem. Legumes such as peas, beans, lentils and chickpeas have been **identified** as emerging allergens, with peas causing particularly severe reactions in those sensitive to them. As they are not one of the fourteen regulated allergens however, there is no legal requirement to specify if an ingredient has been derived from them. The generic term 'vegetable fibre' can be used in place of 'pea fibre,' for example.

There are also some exemptions to the general requirement for all ingredients to be listed in full. For example, there is no requirement to list individual components of herb or spice mixes that make up less than 2% of the finished product. These can be listed using generic terms such as 'herbs,' 'spices' or 'flavourings.' [Allergy UK](#) have highlighted the difficulty this can present to those with less common allergies—such as to chillies, garlic, tarragon or coriander—when trying to identify and avoid them.

2. Welsh Government action

In its response to this petition, the Welsh Government state that the fourteen regulated allergens were originally selected by European regulators based on the prevalence of allergic reactions to them and the likely severity of these reactions. While it is not a requirement to declare the presence of other allergens, it notes that food businesses may choose to do so.

The response acknowledges the difficulty which those who are sensitive to ingredients outside of the fourteen regulated allergens may have in identifying and avoiding those ingredients. It notes that the FSA is committed to reviewing regulations in response to emerging food safety concerns and consumer needs and that it routinely revises its allergen labelling guidance through expert evaluations and stakeholder consultations. As an example, it points to revisions made by the FSA in [March 2025](#) to its allergen labelling best practice guidance which followed research and feedback from stakeholders.

3. Welsh Parliament action

The Legislation, Justice and Constitution Committee held an evidence session on the [Food \(Wales\) Bill](#) on [30 January 2023](#). The Food (Wales) Bill was a Member Bill that set out a range of provisions relating to food, with the stated aim of creating a more sustainable food system in Wales. During the session Aled Evans, a legal adviser to the Senedd Commission, commented that proposals on food labelling were not included in the Bill due to concerns that the Internal Market Act would undermine their effectiveness in practice. The Bill was subsequently rejected by the Senedd on [24 May 2023](#).

While the Senedd has debated other issues relating to food labelling, such as [calorie labelling](#) and [country-of-origin labelling](#), it has not examined clearer labelling of ingredients.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.