

P-06-1531 Mandate Comprehensive and Specific Food Labelling to Support Dietary Needs and Allergies - Correspondence from Professor Adam Fox, 19 February 2026

Thank you for your letter of 27 January 2026 drawing attention to Petition P-06-1531, which raises an important, practical issue for some families of people with allergy: the difficulty of identifying the specific source of ingredients described using generic terms such as “starch”, including where a child has a specific allergy such as to potato. While the petition has been closed, the underlying concern is strongly aligned with the National Allergy Strategy (NAS)’s focus on improving how food businesses communicate potential allergens, so that people living with food allergy can make safe choices with confidence. In particular, the NAS recognises that clear, consistent and trustworthy allergen information—kept up to date when ingredients change—is a public health protection that reduces preventable harm and avoids placing unrealistic responsibility on families to “guess” risk from ambiguous labelling.

In response, I would highlight the following elements of the NAS that are directly relevant to food labelling and to the concerns raised by the petitioner. First, we call for strengthened requirements and collaboration with the Food Standards Agency to support clear and consistent declaration of allergens and of potential allergen presence, including improved use of Precautionary Allergen Labelling (PAL) so consumers have greater clarity and trust, and the development of a stronger evidence-based framework (including work on allergen thresholds/reference doses) to make precautionary statements more meaningful. Second, the Strategy emphasises the need to keep allergen declaration up to date, using validated approaches and ensuring changes to ingredients are clearly communicated—because for allergic consumers, “ingredient drift” can create real risk even when packaging looks familiar. Third, the Strategy supports “Owen’s Law” principles so that, beyond packaged food, allergen information is consistently available in writing at the point of ordering across food service settings, rather than relying on verbal exchanges or customers having to ask—an approach that also strengthens consistency for ingredients described generically.

Practical implications that follow from these commitments include: (1) exploring whether generic descriptors such as “starch” can be made more informative and consistent for allergic consumers (for example, declaring the botanical source where it is materially relevant to safety); (2) improving national consistency and enforcement so that allergen information is reliable across sectors, including SMEs; (3) ensuring that where precautionary statements are used, they are underpinned by clearer rules so they convey actionable information rather than broad uncertainty; and (4) supporting consumer confidence through better systems for communicating ingredient changes and learning from incidents (including clearer pathways for investigation and reporting of allergen-related events). I hope these comments are helpful to the Committee in noting how the petition’s concerns align with the National Allergy Strategy food-safety and labelling priorities, and I would welcome continued cross-sector collaboration with the relevant agencies to progress these improvements.

With kind regards,

Adam Fox