Food Allergen Labelling in Canada
by Carol T. Culhane, P.H.Ec. MBA

Food allergies affect an estimated 5 to 6% of Canadian children and 3 to 4% of Canadian adults. A much larger percentage of the population suffers from a food intolerance, which does not trigger a defense response from the body’s immune system following ingestion. A food intolerance, however, may exhibit symptoms similar to that of a food allergy.

Therefore, the accuracy of the ingredient information on the label of pre-packaged food is a very important safety concern for consumers.

The allergenic component of a food allergen is a protein. Proteins vary by nature in several ways, such that some can cause allergic reactions. In Canada, a ‘priority food allergen’ is one which health officials and regulators regard to be ‘frequently associated with food allergies and allergic-type reactions’.

Twenty-two different ‘priority food allergens’ have been identified by Canadian authorities including:

- any gluten protein or modified gluten protein from barley, oats, rye, triticale and wheat;
- any protein or modified protein portion of any tree nuts (almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, walnuts);
- peanuts, sesame seeds, wheat, triticale, eggs, milk, soybeans, fish, crustaceans, seafood and mustard seeds;
- sulphites at a concentration equal to or exceeding 10 ppm (parts per million) present in either food or alcoholized beverages.

It is important to know that Canada’s list of ‘priority food allergens’ differs from that of the USA - Canada’s largest trading partner.

Canadian food labels will soon list priority food allergens to help you avoid an allergic reaction.

Food allergies are recognized as an important food safety issue and when not readily and easily identified, can pose a significant barrier to safe food access by food allergy sufferers. Effective August 4, 2012, detailed regulations will officially mandate, strengthen and greatly clarify the disclosure of priority food allergens in food offered for sale in Canada. Any food ingredient sourced from a ‘priority food allergen’ must declare the allergen by its official name, either within the list of ingredients or in a ‘Contains’ disclosure at the end of the ingredient list on the product label.

To realize the effect of these allergen-labelling regulations, consider the labels on the following foods purchased for a Grey Cup party which will all bear different information when Grey Cup season rolls around in 2012.

<table>
<thead>
<tr>
<th>Packaged Food Product</th>
<th>Current Ingredient Labeling</th>
<th>New Ingredient Labeling</th>
</tr>
</thead>
</table>
| Cake Mix              | Sugar, flour, ovalbumin, [various additives] | Sugar, flour (wheat), ovalbumin (egg), [various food additives].
                          |                            | or Sugar, flour, ovalbumin [various food additives].
<pre><code>                      |                            | Contains: Egg, Wheat. |
</code></pre>
<p>| Potato Chips          | Potatoes, sunflower oil, salt, seasonings | Potatoes, sunflower oil, salt, seasonings (mustard). |
|                            | or |</p>
<table>
<thead>
<tr>
<th>Product</th>
<th>Ingredients</th>
<th>Contains</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potatoes, sunflower oil, salt, seasonings</td>
<td>Contains: Mustard</td>
<td></td>
</tr>
<tr>
<td>Croissants</td>
<td>Flour, butter, egg, milk, vegetable oil, sugar, modified gluten, lecithin, yeast</td>
<td>Flour (wheat), butter¹, egg, milk, vegetable oil (soybean), sugar, modified gluten (rye), lecithin (soybean), yeast. Or Flour, butter, egg, milk, vegetable oil, sugar, modified starch, lecithin, yeast. Contains: Wheat, Soybean, Rye gluten</td>
</tr>
<tr>
<td>Wine containing ≥10 ppm sulphite content</td>
<td>Sulphite content not disclosed</td>
<td>Contains: Sulphites²</td>
</tr>
</tbody>
</table>

¹Repetition has been avoided. Although the source of the butter is milk, milk need not be identified in the ingredient list or in the Contains statement, as it is already declared as an ingredient.

²A full ingredient statement on the label of an alcoholized beverage is not currently required, nor will it become so, as a result of the new food allergen legislation.

An allergy to gluten, a wheat protein, is the only food allergy known to date, to be genetically inherited. This allergy is called Celiac disease and affects at least 1% of Canadians. A legal definition of ‘gluten’ and ‘gluten-free’ food were each subjected to extensive assessment with a broad range of stakeholders in preparation for the regulatory amendments, resulting in exclusive specifications for these terms in the amended food regulations.

The new Canadian food regulations specify that a ‘gluten-free’ food is one that does not contain any gluten protein, gluten protein fraction or modified gluten protein from barley, oats, rye, triticale or wheat. In contrast, the USA and the EU do not recognize gluten from oats as a priority food allergen. Further, these countries permit a gluten concentration of up to 20 ppm for a food labeled as ‘gluten-free’.

Subsequently, some food recalls in Canada are triggered by foods imported from the USA and the EU, which comply with the allergen disclosure regulations in the countries of origin, but are non-compliant in Canada. Owing to this difference of opinion amongst Canada’s trading partners, and the needs and aspirations of affected consumers and the food manufacturing industry, Health Canada will be issuing a guidance document on the aspect of the < 20 ppm gluten threshold, and the Agency’s position on gluten derived from oats.

Consumers should continue to read food labels thoroughly and realize that changes in Canada’s food allergen labelling will come into force on August 4, 2012, designed to help them avoid an allergic reaction and enhance their access to safe food. More information is available on the Health Canada website: [http://www.hc-sc.gc.ca/fn-an/label-etiquet/allergen/index-eng.php](http://www.hc-sc.gc.ca/fn-an/label-etiquet/allergen/index-eng.php)

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