

An open letter from NARF and leading UK food business operators.

We, as UK food business operators, welcome the Prevention of Future Deaths (PFD) report published by His Majesty's Senior Coroner Marie Voisin following the tragic death of Celia Marsh in 2017.

The Coroner has highlighted a range of issues around Mrs Marsh's case which will require a response from the Department of Health and Social Care, the Food Standards Agency (FSA), public health bodies and the food industry. All these issues deserve serious consideration, but as food businesses and campaigners, we wish to highlight two in particular.

Firstly, the inquest evidenced the use of precautionary allergy labelling which the Coroner has described as "potentially misleading". This increases the size of the barrier to purchase and consume for those people with allergic family members. That is a double whammy of lost sales for businesses and a restriction in choice for shoppers.

The joint Food and Agricultural Organization of the United Nations and World Health Organization Expert Consultation on Risk Assessment of Food Allergens has recently recommended a more rigorous approach to precautionary allergy labelling, including the use of allergen threshold reference doses for pre-packed food to inform this. The FSA itself has also been consulting on these issues and looking at what further changes are required.

The FSA now needs to make a clear decision on thresholds and a strong recommendation to Ministers. This would provide sellers of food with an absolute definition of how much of a specific allergen prepacked food could safely contain before being labelled as free of that allergen. Implementation would enable food producers to bring in consistent industry-standard testing and help keep the most allergic consumers safe and increase the choice of foods they can consume.

Secondly, Mrs Marsh's death in 2017, like many other serious anaphylaxis incidents in recent years, was not immediately reported to the relevant authorities or even the business who had sold the product and bought the supposedly "dairy-free" ingredient from a supplier. This not only posed a risk to customers but also impacted the investigation and learnings from Mrs Marsh's death.

Government and public health bodies must, as the Coroner recommends, devise a "robust system" for the rapid reporting of fatal and near fatal severe allergic reactions. One example is the work that is being done in Australia on mandatory reporting of anaphylaxis cases presented to Emergency Departments and GPs.

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The Natasha Allergy Research Foundation, 85 Great Portland Street, 1st Floor, London W1W 7LT Registered as a Charity in England & Wales No: 1181098; and in Scotland No: SC051610





Mandatory reporting of notifiable infectious diseases already exists in the UK. We would welcome such a system being extended to food-related anaphylaxis which would not only ensure a more rapid and accurate investigation of cases but also allow more rapid action to be taken by food businesses if a valid concern is identified.

We believe, taken together, these two actions could help save lives and build greater trust in the UK food industry for people with food allergies.

Yours sincerely,



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