

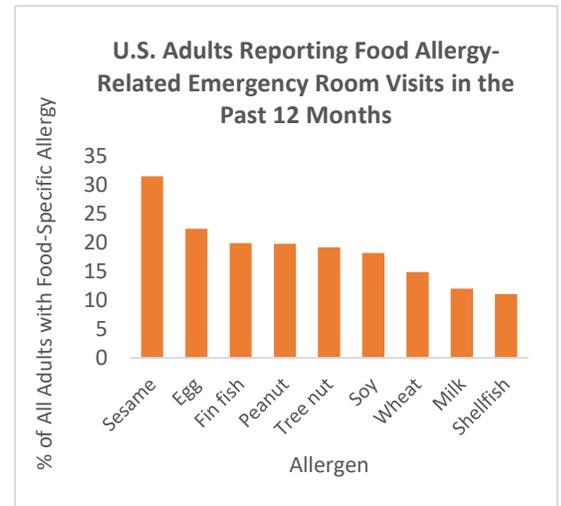
The Call for Sesame Allergen Labeling

An estimated 1.1 million people in the United States live with sesame allergy, and accidental exposure to sesame for some poses potentially deadly risks.¹ Center for Science in the Public Interest (CSPI), along with allergy experts, members of Congress, and concerned citizens, are urging the Food and Drug Administration (FDA) to require that sesame be clearly declared in foods in the same manner as other major allergens.

Sesame allergy is prevalent and dangerous.

Sesame allergy is ranked 9th in prevalence among the most commonly diagnosed food allergies, after peanuts, milk, shellfish, tree nuts, eggs, wheat, soy, and finfish (the “Big Eight”).² And accidental exposure can cause severe and even life-threatening reactions in some individuals. A greater fraction of adults with sesame allergy reported an emergency room visit related to food allergy in the past year (31.5%) than adults with any other major food allergy.³

Allergic reactions to sesame can result from exposure to foods containing sesame ingredients, or that were manufactured on shared machinery with products containing sesame ingredients. Adverse effects have been documented from as little as 1 milligram of sesame protein, an amount found in just 2 sesame seeds.⁴



In 2016, the National Academies of Sciences, Engineering, and Medicine issued a report calling for an update of the list of major allergens, and specifically identified sesame as a focus area. The report found that “[t]he prevalence of sesame seed allergy in the United States appears to be equivalent to the existing eight priority foods or food groups recognized in the United States among children” and concluded that “evidence of the allergy prevalence and reaction severity to sesame seeds may warrant their inclusion on the priority allergen list in the United States.”⁵

Sesame ingredients can remain hidden under current labeling requirements.

While the European Union,⁶ Australia and New Zealand,⁷ and Canada⁸ already require that prepackaged food be labeled for sesame, the U.S. does not. The Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) requires that the Big Eight be declared on packaging using common names, but sesame ingredients can remain hidden as “spices” or “natural flavorings,” or listed under unfamiliar names such as tahini, gingelly, til oil, sesamolina, or benne.⁹ This puts individuals with sesame allergy at higher risk for accidental sesame exposure.

Consumers with sesame allergy must spend countless hours contacting food companies to obtain information about sesame for different products, often to find that this information is unreliable or not available at all. Some food industry leaders, including General Mills and Utz, have recognized the deadly risks of sesame and have begun to protect their customers by including sesame in their allergen policies, but significant gaps remain. Large manufacturers including Hershey, Kellogg, PepsiCo (Frito-Lay), and Mars still fail to consider sesame as part of their allergen programs.¹⁰

CSPI is calling for the FDA to require clear and consistent labeling of sesame in foods.

In 2014, CSPI joined a group of allergy experts and academics in filing a citizen petition with the FDA urging the agency to use its existing authority under FALCPA to require that sesame be clearly declared in the same manner as other major food allergens.¹¹ Such action would reduce confusion among consumers by ensuring that sesame is always declared as an ingredient under its common, readily identifiable name, and never hidden as a “spice” or “natural flavor.”

The petition also called for the FDA to encourage better sesame allergen practices at restaurants by including sesame as part of its allergen training recommendations, and to take steps to prevent unintentional cross-contact from sesame in manufactured foods. Cross-contact can occur when products that contain sesame are manufactured on shared machinery with those that do not.

There is growing support for regulatory action on sesame allergen labeling.

On October 30, 2018, the FDA issued a request for public comment on “Sesame as an Allergen in Foods.” The request garnered 4,821 comments, the vast majority in support of sesame allergen labeling. More than 17,000 people have also supported a petition for sesame labeling posted on Change.org, launched by a father whose 10-year-old son suffered a serious reaction from undeclared sesame in a restaurant meal.¹²

Members of congress have also shown support. Senators Chris Murphy (D-CT), Richard Blumenthal (D-CT), and Ed Markey (D-MA) wrote to the FDA in June 2015 and again in March 2018 asking the agency to take action on sesame allergen labeling.^{13,14} Representatives Eliot Engel (D-NY), Gregg Harper (R-MS), and Carol Shea-Porter (D-NH) of the House Asthma and Allergy Caucus also wrote to the FDA in November 2018 with the same request. Additionally, versions of the Food Labeling Modernization Act (FLMA) introduced in the House by Representatives Frank Pallone, Jr. (D-NJ) and Rosa DeLauro (D-CT) (H.R. 5425), and in the Senate by Senators Blumenthal and Sheldon Whitehouse (D-RI) (S. 2647), would both require FDA to promulgate regulations requiring labeling for sesame as a major allergen.

For more information, please contact the Center for Science in the Public Interest at policy@cspinet.org.

¹ Warren C, Chadha A, Sicherer S, Jiang J, Gupta R. Prevalence and severity of sesame allergy in the United States. *JAMA Network Open*. 2019; 2(8): e199144.

² Gupta R, Warren C, Blumenstock J, Kotowska J, Mittal K, Smith B. The prevalence of childhood food allergy in the United States: An update. *Ann Allergy Asthma Immunol*. 2017; 119: S11.

³ Gupta R, Warren C, Smith B, Jiang J, Blumenstock J, Davis M, Schleimer R, Nadeau K. Prevalence and Severity of Food Allergies Among US Adults. *JAMA Network Open*. 2019; 2(1): e185630.

⁴ Dano, D, et al., Sesame allergy threshold dose distribution. *Food Chem. Toxicol*. 2015. **83**: p. 48-53.

⁵ National Academies of Sciences, Engineering, and Medicine. Finding a path to safety in food allergy: Assessment of the global burden, causes, prevention, management, and public policy. The National Academies Press. 2017.

⁶ Regulation (EU) No. 1169/2011 of the European Parliament and of the Council. October 25, 2011. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:EN:PDF>.

⁷ Australian Government Department of Agriculture and Water Resources. IFN 08-17—Mandatory allergen labeling. May 18, 2017. <http://www.agriculture.gov.au/import/goods/food/notices/ifn-08-17>.

⁸ Canadian Food Inspection Agency, List of ingredients and allergens: manner of declaring. Date modified: July 29, 2016. <http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/list-of-ingredients-and-allergens/eng/1383612857522/1383612932341?chap=2>. Accessed April 12, 2018.

⁹ Allergic Living. Where seeds hide. www.allergicliving.com/2010/09/01/where-seeds-hide/. Published September 2010.

¹⁰ Center for Science in the Public Interest. Seeds of Change. April 13, 2018. <https://cspinet.org/seedsofchange>

¹¹ Citizen Petition: to require that sesame seeds and sesame products be regulated in a manner similar to a major allergen. Nov. 18, 2014: FDA-2014-P-2035-0001. Available on-line at: <https://cspinet.org/sites/default/files/attachment/11-18-sesame-petition.pdf>. Accessed April 12, 2018.

¹² Heller, B. Add sesame seeds as an allergen to US product labeling laws (require them to be disclosed on US food labels). Change.org. www.change.org/p/fda-add-sesame-seeds-as-an-allergen-to-us-product-labeling-laws-require-them-to-be-disclosed-on-us-food-labels/c?source_location=petition_show

¹³ Letter from Senators Murphy, Blumenthal, and Markey to Commissioner Ostroff. June 24, 2015. www.murphy.senate.gov/newsroom/press-releases/murphy-blumenthal-call-on-fda-to-label-and-regulate-all-sesame-products.

¹⁴ Murphy leads group in calling on FDA to label and regulate all sesame products. March 26, 2018. www.murphy.senate.gov/newsroom/press-releases/murphy-leads-group-in-calling-on-fda-to-label-and-regulate-all-sesame-products.