



March 4, 2020

Ms. Nita Lowey  
 Chairperson  
 House Committee on Appropriations  
 U.S. House of Representatives  
 Washington, DC 20515

Ms. Kay Granger  
 Ranking Member  
 House Committee on Appropriations  
 U.S. House of Representatives  
 Washington, DC 20515

Mr. Sanford Bishop Jr.  
 Chairperson  
 Appropriations Subcommittee on  
 Agriculture, Rural Development, Food and  
 Drug Administration, and Related Agencies  
 U.S. House of Representatives  
 Washington, DC 20515

Mr. Jeff Fortenberry  
 Ranking Member  
 Appropriations Subcommittee on  
 Agriculture, Rural Development, Food and  
 Drug Administration, and Related Agencies  
 U.S. House of Representatives  
 Washington, DC 20515

Dear Chairpersons and Ranking Members:

The undersigned allergy and consumer organizations write to urging you to prioritize resources to the Food and Drug Administration (FDA) to carry out vital work related to allergen labeling.

Food allergy in the United States is now a public health crisis impacting more than 32 million Americans, many who suffer from serious and potentially life-threatening food allergies. Work at FDA is critical to improving the lives of Americans with food allergy and protecting them against life-threatening reactions.

We are concerned that the agency lacks resources to ensure allergens are appropriately labeled on foods, and therefore **we are asking Congress to provide a \$3 million increase to the FDA's food allergen labeling work.**

Allergen declarations on foods are a key protection that allows Americans with food allergy to avoid serious and even life-threatening reactions. The FDA helps ensure allergens are clearly declared through research, testing, guidance, inspections, and enforcement.

Undeclared allergens are a leading cause of food recalls, presenting a serious health hazard for consumers and major economic burden to the food industry. The FDA oversees roughly 500 to 800 food recalls each year, and undeclared allergens account for roughly a third of all serious health risks reported to FDA's Reportable Foods Registry. To address this risk, the agency must work with the food industry to identify and prevent undeclared allergens from contaminating foods.

The FDA currently lacks capacity to carry out its core responsibilities for allergen labeling, leading to unacceptable delays. For example, in 2014 Center for Science in the Public Interest (CSPI) petitioned the FDA to require food companies to label for sesame. An estimated 1.5 million Americans report being allergic to sesame, making sesame close in prevalence and higher in severity than allergens that are currently required to be labeled. The need for labeling is urgent: nearly a third of adults with sesame allergy have been to the emergency room in the past year, a greater fraction than adults with any other major food allergy. Yet the FDA recently estimated, shockingly, that it would not be able to develop rules for sesame labeling for another 5 to 7 years—more than a decade after the CSPI sesame labeling petition was filed.

This lack of action by FDA signals an urgent need for greater resource investment by the agency in its essential allergen labeling work. We therefore urge you to include the following language in the Report on the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Bill for Fiscal Year 2021:

*Allergen Labeling.* -- Of the amount provided for the Center for Food Safety and Applied Nutrition (CFSAN), the Committee provides an increase of \$3,000,000 for work related to allergen labeling. The committee is concerned that the FDA has failed to take further action to require labeling for sesame following the agency's request for information on this allergen in 2018. Sesame allergy is close in prevalence and higher in severity than allergy to some of the major allergens currently required to be labeled in the United States, and a greater fraction of adults with sesame allergy report having made an emergency room visit related to food allergy in the past year than adults with any other major food allergy. Yet sesame is not labeled on food packages and can be hidden as a "spice" or "natural flavor." The Committee urges the FDA to act swiftly to address this risk by requiring labeling for sesame, the same as other major food allergens.

Protecting consumers with food allergy is a critical part of FDA's important work ensuring that our foods are safe and properly labeled. We therefore urge you to support the above language, which will ensure that adequate resources are devoted to this work in the coming year.

Sincerely,

Allergy & Asthma Network  
American Partnership for Eosinophilic Disorders  
Asthma and Allergy Foundation of America  
Campaign Urging Research for Eosinophilic Disease  
Center for Science in the Public Interest  
End Allergies Together  
Food Allergy & Anaphylaxis Connection Team  
Food Allergy Research and Education  
The FPIES Foundation  
The International FPIES Association