



Memorandum in Support

A4486

February 18, 2021

Assembly Member Epstein

AN ACT to amend the agriculture and markets law, in relation to the labeling of food products containing sesame

On behalf of the Asthma and Allergy Foundation of America (AAFA) and the more than 6 million children living with life-threatening food allergies, we submit this Memo in Support of the above mentioned bill.

AAFA is the leading patient organization for people with asthma and allergies, and the oldest asthma and allergy patient organization in the world. Kids With Food Allergies, a division of AAFA, offers tools, education, and community to families and children coping with food allergies across the country.

Sesame is the ninth most common food allergy among American adults and children, ranking just behind the eight allergens for which FDA requires labeling (milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat, and soybeans).¹ A 2019 article in JAMA Network confirms that an estimated 1.1 million children and adults in the U.S. have a sesame allergy, underscoring the importance of labeling to help individuals and families safely avoid the allergen.²

Allergic reactions to sesame can be even more severe than reactions to these eight allergens. Among adults with sesame allergies, 32.5 percent report having been to the emergency room (ER) in the past year for an allergic reaction – a higher rate than for any of the eight labeled allergens.³ Rates of ER visits are even more common among children with sesame allergies.⁴ The

¹ 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).

² Warren CM, Chadha AS, Sicherer SH, Jiang J, Gupta RS. Prevalence and Severity of Sesame Allergy in the United States. *JAMA Netw Open*. Published online August 02, 2019(8):e199144. doi:10.1001/jamanetworkopen.2019.9144

³ Letter to Scott Gottlieb from Ruchi S. Gupta, MD. Prevalence Data in Support of 2014 Citizen Petition Regarding Allergen Labeling of Sesame, FDA-2014-P-2035. April 2, 2018.

<https://www.regulations.gov/document?D=FDA-2014-P-2035-0259>.

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JAMA study confirmed that more than a third of adults and children with sesame allergy had experienced severe reactions.⁵

Despite the prevalence and severity of sesame allergy, clear labeling of sesame is not currently required. Sesame can be listed under names that are not easily recognized to consumers, such as “sim sim” or “til; or simply listed as “nature flavors” or “spices” without being named. The absence of a clear label makes it difficult for consumers to identify products that contain sesame, increasing the risk of accidental exposure and allergic reactions.

Considering the prevalence and severity of sesame allergies, we strongly support the A4486 and its requirement to label sesame products. Uniform and easily understandable labels will help Americans with sesame allergies and their families safely navigate their food choices and avoid preventable reactions. AAFA believes that what is ultimately needed is national, mandatory sesame labeling requirements enforced by the FDA. However, in the interim, this law would, like similar legislation passed in Illinois in 2019, send a message of the importance of sesame labeling to industry and to federal policymakers.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America

⁵ Warren CM, Chadha AS, Sicherer SH, Jiang J, Gupta RS. Prevalence and Severity of Sesame Allergy in the United States. JAMA Netw Open. Published online August 02, 2019;2(8):e199144.
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Memorandum in Support

S454

February 18, 2021

Senator Biaggi

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