Draft Food Information Regulations Consultation Replies

1. “I would like to contribute my views to the consultation on the above. I am happy to agree to my views being published if that is required.

By way of introduction I would like to explain my interest. I am mum to two children, the eldest of which is 9. As a baby she was both dairy intolerant and allergic, and three years ago at the age of 6 she was diagnosed with Coeliac Disease, which means she cannot eat any food products with gluten or products that have been produced in an area handling gluten where sufficient cleaning processes have not removed the risk of cross contamination. She is also intolerant to oats, corn, maize and artificial sweeteners.

Food labelling has long been on the agenda of Coeliac UK, the charity committed to raising awareness, Providing information and undertaking research into the disease. The forthcoming changes are already evident on some manufacturers labels and assist us in making SAFE choices for our child. Without full and proper information, we would be in a position to either risk reaction or choose not to purchase. We tend to do the latter as the former is too serious to contemplate. Typically, within a couple of hours of eating gluten. Our daughter will bloat, then vomit and have a rise in temperature. Over the next few weeks, she will suffer stomach cramps, bloating, migraines and joint pains. This may last up to 2 months from as little as a crumb.

At the moment, local produce often has no reference to ingredients or contaminant risks in production. To that end we do not purchase any local processed meats, such as ham, sausages, beef burgers etc. we don’t buy gluten free products from butchers unless it is absolutely clear the issues of allergens are taken seriously and find it very difficult to eat out. Catering establishments on the island with the notable exceptions of one or two like the Creg na Baa have little understanding of allergens, why someone would want to know, often cannot tell you whats in a dish and treat people with medical intolerances/diseases as fussy or faddy eaters.

To have labelling on menus and to be able to have meaningful conversations with staff and chefs would open up our child’s world so much more. It very much becomes a food standards issue, with health and safety of the end consumer getting the priority it deserves.

The campaign of various “free from” groups to get this labelling has been hard working for a number of years. It would be a nonsense to not adopt this here. We should be able to expect a consistency of labelling from on and off island producers and it should make life easy for our visitors on the island to know they can trust the information they ate provided with.”
2. “Could you please advise if this is true consultation? and if businesses disagree, changes will be made to the legislation? or is it imposition of EU regulations and if we do not implement Isle of Man food producers will not be able to export?”

3. “how will this effect things like the sale of Kippers, scallops and locally produced and sold foods (not exported to the EU) and will it mean that some of these items will have to be laboratory tested to determine level of salt etc, and properly packaged, as they are sold loose at the moment”

4. “as a small B&B provider, how will this directly affect my business? So before I over react, I need to know, as I am sure lots of small providers would like to be told, the bottom line, as it were. Does this mean I will have to give my guests a list of ingredients, country of origin, additives, nutritional value, of their breakfast, as by the time I cook and serve it will be out of the packaging? If I offer them a piece of homemade cake or a scone will it have to be accompanied by a list of the same, see above)?”

5. “I have no problem with any of my personal views being used or made public in my name. In my opinion, the proposal to shift the onus of providing allergen information on menus to all restaurants regarding all food sold is totally unworkable. Our menu is changed every day and to list all ingredients of every dish would be practically impossible, not to mention unreadable.

It is an open opportunity for diners looking for the chance to sue restaurants without taking any responsibility for their own actions.

People who have allergies know what they are allergic to and the degree to which they are affected and therefore, they should be asked to declare any expected problems to the establishment at which they are eating, giving the operators fair warning about what they may or may not include in the food their customer would be eating and whether it is even safe for them to enter the premises.”

6. “It looks as though there is much conflict between the FIC and existing W & M legislation in the UK. I’m not panicking just yet and hope I’m wrong but there is no reason to believe that this is not the case over here too.

W & M will be enforcing the quantity marking requirements of the FIC in the UK.”

7. “You may not know but my eldest son, who is almost 3, has severe multiple food allergies, asthma and is anaphylactic. This is a growing problem with over 50% of people in the British Isles have allergies and 9% who have fatal food allergies. The Royal college of surgeons latest report called it an epidemic in the UK.

I am writing to you to ask about the food labelling laws on the island. We currently unable to eat in any restaurants as staff are unaware of ingredients, cross contamination and in many cases that food allergies are in fact life threatening. Frazer is classed as disabled and if he was unable to enter
an establishment due to wheelchair access this would be seen as discrimination, it is exactly the same for us. My wife and I are currently beginning a campaign to generally raise awareness and have the full support of Sarah Surgeon the hospital dietician.

I’m sure you are aware of this but here is the new law that is coming into force in the UK and the EU https://www.gov.uk/government/policies/providing-better-information-and-protection-for-consumers/supporting-pages/food-information-and-labelling.

We wanted to ask you when or if the new labelling laws would be coming into force on the isle of Man? If this is across the EU does it effect our export? Sarah Surgeon herself said she would be unable to recommend Manx produce as it isn’t safe for allergy sufferers. We would be grateful to hear back from you and to explain in detail the issues, benefits as well as how this will integrates with the wider campaign (ie Sabrina’s law in schools and establishments, anti obesity, diabetes prevention etc).

We have a real chance to not only save lives, but to make a difference and set the Isle of Man as the most allergy friendly place in Europe, this in turn will ultimately pay other dividends.”

8. “At their last meeting the Ramsey Town Commissioners attention was drawn to the above consultation, the changes proposed and the fact that similar Regulations are already in force in England, Scotland, Wales and Northern Ireland.

The Commissioners noted the consultation without comment.”