FBIA Confirms Food Industry Commitment to Food Safety and Temporary Use of Guidance for Ingredient Flexibility

The food industry and its supply chain continue to utilize extraordinary efforts to operate at the highest level possible to continue to feed the country. As always, the safety of food production and finished products is a responsibility that is our highest priority.

The Food and Beverage Issue Alliance (FBIA) remains focused on our partnership with the Food and Drug Administration (FDA) through this public health emergency to provide grounded, practical solutions for hurdles we are facing in the food supply chain to maintain a reliable food supply to consumers. FDA’s labeling flexibility guidance will give us a tool if needed to assist in guaranteeing the continued flow of food products to consumers.

The FDA states in its guidance that manufacturers may make formulation changes provided that: “...the ingredient being substituted for the labeled ingredient does not cause any adverse health effect (including food allergens, gluten, sulfites, or other ingredients known to cause sensitivities (see section C.2.a) in some people, for example, glutamates).”

This flexibility guidance focuses on food safety as a priority and never allows introduction of any ingredient substitution that would impact allergens. Industry understands and embraces the importance of this priority element in the guidance.

The food industry remains extremely sensitive to allergens and other ingredient-related concerns and is committed to utilizing the flexibility given by FDA only in rare situations that may be necessitated by supply limitations that would otherwise impact the production and availability of food products. Substitutions or changes would only be executed when it is temporarily necessary to do so in order to keep food products available to consumers, and any needed substitution will be communicated to the consumer on a manufacturer’s website or at point-of-sale.
Examples of flexible substitutions include:

- Substituting acids, such as malic acid for citric acid
- Substituting similar ingredients of different origins for example, California raisins for another domestic or international location source

Food safety and transparency in the labeling of ingredients, including allergens, is of the utmost importance to the food industry, and we are committed to keeping consumers as informed as possible on any temporary ingredient changes. FBIA will continue to work with the agency and food industry companies to ensure that reliance on this flexibility be utilized only when necessary, and will not impact consumer safety or health during the COVID-19 public health emergency.