
MEDIA BRIEFING

KELLOGG'S INTENTIONALLY ADDING ALLERGENS TO FOOD PRODUCTS

On March 30, 2016, The Kellogg Company quietly disclosed on a food allergy website that they would begin adding peanut flour to eight varieties of crackers that were previously considered safe by many with peanut allergy¹. The decision and relative silence surrounding the disclosure puts many with peanut allergies – especially children – **at significant risk for anaphylaxis, a severe, sometimes life threatening reaction.**

Though Kellogg's will not disclose their reason for adding peanut flour to products and endangering individuals with peanut allergy – asserting only that the change was “needed” and that it was a “hard decision” for them² – we surmise **the company is doing this to avoid the costs of complying with new directives of the Food Safety Modernization Act (FSMA) that become mandatory this September³.**

This briefing is intended to provide context for the media, parents, school nurses, teachers, and all others that care for children with food allergies so they fully appreciate the implications of Kellogg's decision.

What is the immediate concern?

Many in the food allergy community have considered these crackers safe for peanut allergies for years. They are often considered “go to” snacks at daycare facilities, preschools, and cafeterias where peanut and tree nut bans are in place to protect allergic students.

An individual with peanut allergy that ingests or comes in contact with the newly formulated crackers runs the risk of an anaphylactic reaction that may result in hospitalization or death.

We urge you to note this change and avoid these Keebler and Austin brand products if you or someone in your care has a peanut allergy. Note that these products are no longer safe for facilities that maintain a peanut-exclusion policy.

Which products are affected?

The firm's Keebler and Austin brand crackers will be affected, specifically⁴:

- Keebler® brand *Club® & Cheddar Sandwich Crackers, Cheese & Cheddar Sandwich Crackers, Pepper Jack Sandwich Crackers* and *Variety Pack Sandwich Crackers*;
- Austin® brand *Cheddar Cheese Cracker Sandwiches, Grilled Cheese Cracker Sandwiches, Pepper Jack Cracker Sandwiches*, and *Variety Pack Cracker Sandwiches*.

Why is Kellogg's adding peanuts to products previously considered safe?

FSMA directives will soon raise allergen cross-contact – i.e. contamination resulting from manufacturing practices – to the level of scrutiny of other food-borne safety issues where there were fewer mandatory rules before⁵. This may introduce a nominal cost for companies to comply.

It is surmised that Kellogg's is *preemptively* adding minute quantities of peanut flour to these crackers so the ingredient can be added to the ingredient list. This will allow the company to avoid the costs of complying with directives of the Food Safety Modernization Act (FSMA) that go into effect this September.

Rather than implement the additional requirements of the new FSMA directives, it is believed Kellogg's is adding trace amounts of the allergen to dispense with the entire process. If this is indeed true, they are making their products *more allergenic* in order to avoid the costs of complying with directives intended to make product *safer*.



Hasn't the company responded to concerns by promising to return one variety of cracker to the peanut-free formulation?

Yes, but their confusing pledge to remove the peanut flour from the *Austin Grilled Cheese Sandwich Crackers* variety in September after adding it now greatly exacerbates the dangers⁶. This means consumers may purchase a product that either *does* or *does not* contain peanut flour depending on when they visit the market.

The company makes no claim the reformulated crackers will be made in a peanut-free facility, nor are there assurances that once the peanut flour is removed, the crackers will be produced on a manufacturing line separate from the peanut flour containing varieties. There may still be a danger of cross-contact with peanuts even after the peanut flour has been removed.

We urge those with peanut allergy to avoid *Austin Grilled Cheese Sandwich Crackers* regardless of whether or not the peanut flour has been removed.

How might this lead to other allergens being added across Kellogg's product line?

If indeed Kellogg's is taking this action to avoid the costs of implementing FSMA directives for peanut allergen control in their Keebler manufacturing facilities, they may be planning to add traces of other allergens – including *milk*, *soy*, *egg* and *tree nuts* – to other products manufactured in facilities where these allergens are processed in order achieve the same results.

How might this lead to other companies adding allergens to their product lines?

Kellogg's action is a litmus test for the entire food industry. If Kellogg's is successful implementing their plan with minimal pushback from consumers, other companies may follow their lead by adding minute quantities of allergens to *their* products in order to achieve the same cost avoidance goals.

We have reached a tipping point where the industry may decide that adding allergens to products in order to avoid the costs of implementing FSMA directives is in the interest of their shareholders. This will have catastrophic consequences for the allergic community, where many products that were previously acceptable for consumption are purposefully tainted.

How are concerned consumers responding?

A petition was initiated on Change.org urging John A Bryant, Chairman and CEO of the Kellogg Company to reconsider his plan. To date, the petition has garnered over 24,000 signatures and continues to build momentum.

Consumers are also tweeting, e-mailing, posting and voicing their concerns via Kellogg's website, social media properties and consumer phone line.

Important Consumer Resources

There are a number of resources available to learn more about Kellogg's plan and take action:

- Read more about Kellogg's plan: snacksafely.com/kelloggs
- Read, sign, and distribute the petition to family and friends: change.org/KelloggsPeanuts
- Tweet your concerns to **@KelloggsUS** using hashtag **#NoPeanutFlour**
- Post your concerns to Kellogg's website: kelloggs.com/en_US/contact-us-form.html
- Voice your concerns to Kellogg's consumer phone line: **1-800-962-1413**

References

¹Food Allergy Research & Education – foodallergy.org/alerts/ingredient-notices-feed;

²SnackSafely.com – snacksafely.com/2016/04/kelloggs-potential-for-injury-illness-and-death-is-a-cost-of-doing-business/;

³US Food and Drug Administration - fda.gov/Food/GuidanceRegulation/FSMA/ucm334115.htm;

⁴Food Allergy Research & Education – *ibid*;

⁵US Food and Drug Administration - *ibid*;

⁶SnackSafely.com - *ibid*;

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