

New food trends and the need to reconsider “intended use” and food safety labeling

As food and cooking habits changes and new products are introduced, we sometimes need to reconsider what is “intended use” and what precautions should be taken to ensure we deliver safe food products to the consumers.

Within the last year I have come across two examples where intended use and labeling had to be re-considered or changed.

Case 1 Enzyme inactivation – not suitable for raw food baking

I came across this first case on a recent project for a local company on a Novel Food application for a variation of an oil seed, which among many others properties which helps bakery to stay fresh longer, and thereby minimize food waste.

The seeds have many interesting properties, however, during the harvesting and removal of the seeds an enzyme is released which should be inactivated by heat before consumed.

Therefore, the application was made specifically on bakery products. But what does bakery mean today?

Asking your grandparents, it would include heat treatment and the temperature would exceed 90C which would be sufficient for inactivation of this specific enzyme.

In the mean time I have tried out seeds in my own kitchen for my favorite flapjack recipes and also a raw food cake - but is this safe to eat when there is no or very low heat treatment? With my own limited in-take I am confident this is pretty safe but within the Novel Food application we had to make it clear that for the consumer market the seeds must be labeled “For hot baking only – not recommended for raw food bakery”.



Case 2 Same ingredients – different product



Meat re-placements is a booming industry across the western world. These products are often based on various types of peas, beans and other vegetables mixed with herbs, spices They are often to be found in the cool next to meat products.

However only a few shelves away you may find different “ready to eat” products such as dips and seasoning based on peas, beans and other

vegetables mixed with herbs and spices. So what is the difference and can one replace the other?

Often it could be much cheaper buying one 300g pack of such “meat replacement mix” and using it for dip for a large group of people rather than 3 x 100g cups of Humus as the ingredients may be identical – but is it safe to eat?

Difficult to answer as this depends on raw material quality and pre-treatment of raw material, the hygiene in design and cleaning validation of the plant, general hygiene requirements at the site and last but not least the shelf life study.

By now I have been in touch with two different companies asking about the intended use and if their “plantefars” (Danish word for plant mince) requires heat treatment before usage or it would be safe to eat without. Both companies had new labels on their products within the month now stating that heat treatment is required.



The conclusion is that for each type of food being brought to the market it is important to consider foreseeable use and foreseeable abuse (or misuse) prior to risk assessments and labeling of foods – based on new trends among consumers.