

Can't cut the mustard — it's everywhere

By Ronald Doering

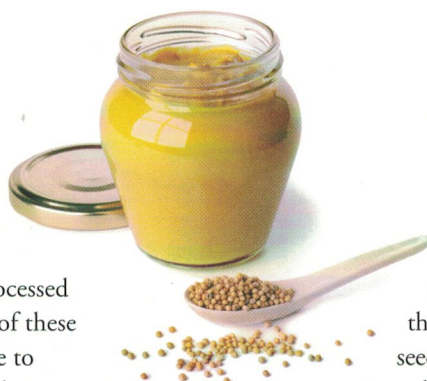
Since Canada's new food allergen labelling regulations came into force on Aug. 4, 2012, the most common category of recalls has been undeclared mustard. There have been eight national voluntary Class 1 product recalls on a broad range of products, including kosher frankfurters, macaroni and potato salad, pizzas, barbecue kabobs, various wiener products and, just this month, another frozen pizza product.

Why are we seeing so many mustard recalls? Mustard is now one of the 10 priority food allergens that must be declared in the ingredient list or have a clear statement that begins with "Contains..." on their labels. Even under the old rules, mustard had to be listed if it were a primary ingredient, but now, under the new rules, priority allergens must be listed even if they are merely a component of an ingredient. This long overdue reform corrects past situations in which manufacturers didn't need to disclose the presence of an allergen if it were contained within what they listed as spices, flavourings or seasonings. Mustard is widely used in most salad

dressings, barbecue sauces, vinaigrettes, curries, pickles and processed meats. Manufacturers of these products will now have to change their labels so the mustard-allergic consumer can finally know of the mustard's presence. As Marilyn Allen, a consultant on the issues of allergies and anaphylaxis for Anaphylaxis Canada, has noted, until these new regulations were brought into operation the presence of mustard was "very, very difficult to ferret out" in literally hundreds of food products.

The new rules will not be as problematic for food manufacturers that have been exporting to Europe, as mustard has been a prioritized allergen for food labelling there for many years. For others, complying with the new labelling rules is proving to be quite a challenge. Often suppliers of prepared soups, sauces, gravies and spice combinations have not even disclosed the various ingredients to the food manufacturer.

Mustard is probably the world's most common condiment. An ancient food, it was the Romans who introduced prepared mustard by grinding the seeds and adding wine to create a paste that is very similar to modern mustard. French monks at Dijon refined the process for creating prepared mustard, and by the 17th century Dijon became the mustard centre of the world. It was also there in 1777 that a M. Grey arranged funding from a M. Poupon to allow him to expand the production of his mustard processing facility, solidifying Dijon as the mustard capital of the world. It was not until 1904, at the St. Louis World's Fair, that R.T. French added turmeric and introduced bright yellow mustard as a condiment for that other new American invention — the hot dog.



Most Canadians would be surprised to learn that we are the largest mustard seed producer in the world. The Canadian

Grain Commission establishes and maintains quality standards for mustard seed under Section 5 of the *Canada Grain Regulations*, allowing it to be traded around the world with the highest reputation for quality. Nearly all those famous British and French mustards are made with Canadian mustard. This is another Western Canadian agricultural success story that deserves to be better known, just as we should all know that Canada, in just a few years, went from nowhere to being the largest producer of lentils in the world, thanks to the genius of our agricultural scientists and our highly innovative and efficient Western Canadian farmers.

Because mustard belongs to the *Brassica* family, and canola oil can be made from both rapeseed (*Brassica Napus* and *Brassica Rapa*) and mustard seed (*Brassica Juncea*), the question has arisen whether canola oil should be considered a risk for people with a mustard allergy, and allergen labelling required. Health Canada has announced that because the oil has been highly refined, it does not contain appreciable amounts of the protein that could cause an allergic reaction.

Because mustard is so widely used in spice preparations, flavourings and sauces, we are likely to see many more recalls until food manufacturers get better organized to meet the new labelling rules. ●

Ronald L. Doering, BA, LL.B., MA, LL.D., is a past president of the Canadian Food Inspection Agency. He is Counsel in the Ottawa offices of Gowlings. Contact him at Ronald.doering@gowlings.com