Master Brewers Food Bites



From the Food Safety Committee

Sesame Allergen

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In 2021 the Food Allergy Safety, Treatment, Education, and Research (FASTER) Act was made law, making sesame the 9th Major Food Allergen recognized by the Food and Drug Administration (FDA) in the United States. On January 1, 2023, The FASTER Act becomes effective, and sesame allergen must be identified as a major food allergen on food labeling. Essentially, sesame must now be treated the same as any other major food allergens you use in your brewery.

Sesame refers to the edible seeds of the sesame plant. Sesame is typically consumed as seeds, as oil expressed from seeds, or as products made from the seeds or oil. While sesame is not a common beer ingredient, it (or products made from it) can be used as a flavoring adjunct, which typically imparts a nutty flavor in food and beverage. Some examples of sesame-containing beers are Faster, Bigger, Better, Bolder by The Bruery & Dogfish Head and Sesame Candy by Trillium Brewing Company.

To make identifying allergen-containing products easier for consumers with food allergies and hypersensitivities, the FDA has regulations in place that require companies to list ingredients on packaged foods and beverages with specific requirements for how to label major food allergens. In addition to calling out major food allergens on a label, companies must have food allergen controls designed to ensure there is no cross-contact between major food allergens and nonallergen materials or ingredients and to ensure correct labeling is used when packaging a product. Each company will need to evaluate their allergen risks to determine which food allergen controls are necessary for their operation. Examples include a storage plan that keeps allergen-containing ingredients or products separate from nonallergen ingredients, products, or materials; eliminating allergens from the brewery all-together;

or using allergen swab testing to verify that allergens used in production are fully removed by cleaning activities.

Typical beer labeling falls under Alcohol and Tobacco Tax and Trade Bureau (TTB) oversight and is not required to follow FDA labeling regulations. However, some of the alternative beverages that breweries are now producing, including, but not limited to, some types of non-alcoholic beverages, do fall under FDA labeling regulation.² These FDA-regulated labels and the food allergen controls associated with these products must be compliant with the FASTER Act on January 1, 2023.

For more information specific to the FASTER Act, including frequently asked questions, watch this video from the FDA: FASTER Act Overview: FDA's Perspective.

For more information on food allergies, major food allergens, and the specific requirements for labeling major food allergens visit www.fda. gov/food/food-labeling-nutrition/food-allergies.

- Milk, eggs, fish, shellfish, tree nuts (including coconut), peanuts, wheat, and soybeans were the original major food allergens identified by FALCPA (the Food Allergen Labeling and Consumer Protection Act of 2004) and regulated by the FDA.
- The regulation(s) your nonalcoholic product falls under is subject to multiple factors, including, but not necessarily limited to, the ingredients used, whether it was fermented then dealcoholized, or whether it is a nonfermented beverage. More information on this can be found through the Master Brewers, Brewers Association, and FDA websites.

Ask the Food Safety Team

Ever have a food safety question you don't know the answer to or for which you would like a second opinion? The Food Safety team is there to help! Just post your question in the "Ask the Brewmasters" section of the community site, and the Master Brewers Food Safety Committee will weigh in or get another expert's answer for you!