

# Food Alert

The ultimate guide to  
allergen management



# The ultimate guide to allergen management

Allergens are a huge concern in the food industry – and rightly so, because an estimated **2 million people** in the UK currently live with a diagnosed food allergy, and a further 600,000 with Coeliac disease.

As a food business operator (FBO), it's important that you have robust procedures in place to protect your customers and your business – because getting it wrong can have a huge financial and reputational impact on your business. In fact, penalties for non-compliance with food safety legislation include **unlimited fines**, so mistakes could be costly. For example:

- In 2020, Haute Dolci in Cheshire were sentenced to a fine of £3,635 after a woman ate food containing nuts, even though she warned the staff she was allergic

- Royal Spice in Staffordshire was fined more than £5,000 for selling a pizza containing almond powder to a customer with a nut allergy

Those are pretty hefty numbers, and ones you probably don't want to be dealing with right now. Not only that, but if a fatality occurs as a result of insufficient allergen management at your business, you could take a huge hit to your reputation and have to pay out costly legal fees.

But there's no need to worry – the experts at Food Alert are here to guide you through the law surrounding allergens and our top tips for controlling and managing allergens at your business.



# What does the law say?

If you run any sort of food business, there's a lot of legislation surrounding allergen management that you've got to comply with to keep everyone safe.

The Food Information Regulations 2014 (full name EU Food Information for Consumers Regulations) changed how allergen information is provided and presented to customers, and introduced requirements for food businesses to emphasise any of the 14 allergens in ingredients of prepacked food, and provide information on allergens for non-prepacked food.

And, in October 2021, **Natasha's Law** was introduced – which applies to prepacked for direct sale (PPDS) food, and states that the label must show the name of the food and the ingredients list with any of the 14 allergens emphasised.

## Case in point - Natasha's Law

In 2016, Natasha Ednan-Laperouse passed away after an allergic reaction to sesame in an inadequately labelled baguette from Pret A Manger.

While Pret A Manger were following allergen legislation at the time, the incident showed they weren't doing enough to protect allergy sufferers.

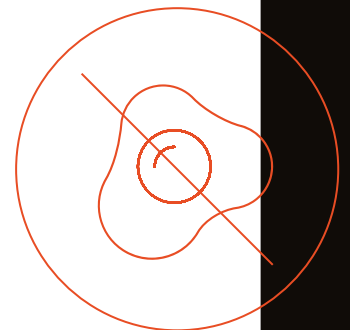
## Owen's Law - ongoing discussions

Discussions are still happening around Owen's Law - the proposed legislation changes regarding allergen labelling in restaurants that will make it a legal requirement for restaurants to print allergen information on their menus. We're keeping a close eye on the developments, as well as general industry thoughts on the law.

## The 14 allergens

Food businesses have to tell customers if any of their food contains any of these 14 ingredients. And, while customers might have other allergies or intolerances, only the 14 allergens have to be declared by law. The 14 allergens are...

- ❌ Celery
- ❌ Cereals containing gluten (such as wheat, barley and oats)
- ❌ Crustaceans (such as prawns, crabs or lobsters)
- ❌ Eggs
- ❌ Fish
- ❌ Lupin
- ❌ Milk
- ❌ Molluscs
- ❌ Mustard
- ❌ Peanuts
- ❌ Sesame
- ❌ Soybeans
- ❌ Sulphur dioxide and sulphites
- ❌ Tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans and macadamia nuts)



## How do you declare allergens?

Declaring allergens depends on what kind of food business you are. In a food business, you have to provide allergen information in writing if you sell or provide food to customers directly. This can be either:

- Full allergen information on a menu, chalkboard or information pack
- A written notice placed in a visible position explaining how customers can see the information

Allergen information can be provided in conversation with a customer and can be backed up by written information to make sure the information you're providing is consistent and accurate.

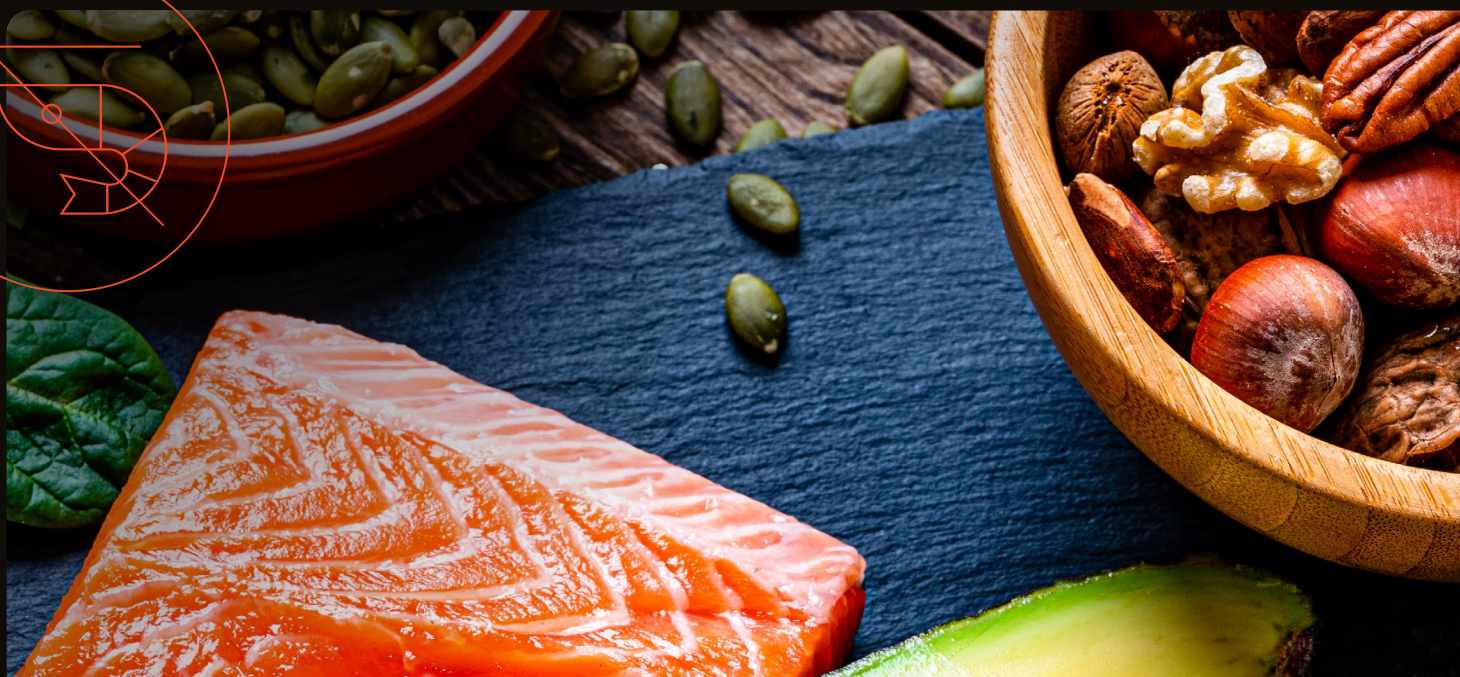
It's important that there are clear in-house procedures that staff know to follow when having conversations about allergens – for example, orders should be checked and verified to make sure any particular allergens aren't included, and it's recommended that a manager or 'allergy hero' is involved with conversations with customers (we'll get onto allergy heroes later)

## Food Alert's top solutions to allergen management

It's all very well knowing what the laws are surrounding allergens, but managing them is a whole different ball-game. Using our very own smart software, Alert65, we identified seven key areas of non-conformance when it comes to allergy complaints – which are rising. In 2012, 0% of food complaints logged in Alert65 were allergic reactions, but this number rose to 7.8% in 2022.

The seven areas we identified were:

- No — **1** Incorrect allergen information
- No — **2** Allergen information not available
- No — **3** Training
- No — **4** Storage
- No — **5** Preparation
- No — **6** Breakdown in allergen procedures
- No — **7** Information formatting



# So how can you make sure you don't slip up in any of those areas?



Allergen management might seem like a bit of a minefield, and there's a lot to think about, but let's break it down and take a look at some practical steps for allergen control.

No — 1

## Menus



- ✓ Where it's possible, choose core ingredients that are naturally free of allergens
- ✓ Consider reducing your menu to try and control allergens and the risk of cross-contact
- ✓ Buying in ingredients free from allergens might be better than making them on-site to avoid cross-contamination
- ✓ If you're not absolutely certain you can control cross-contact in your kitchen, make sure you put an additional warning on your menus, or somewhere else that's clearly visible

No — 2

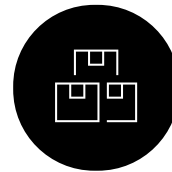
## Delivery



- ✓ Make sure you're monitoring deliveries to make sure they match the specifications and that allergens are clearly listed
- ✓ If any substitutions are in the delivery, make sure allergen information for them is available and make sure this is communicated with both front and back of house
- ✓ If any items containing allergens are damaged or open, the delivery should be rejected as this might present a contamination risk

No — 3

## Storage



- ✔ Make sure all your food is labelled when it's stored
- ✔ Any ingredients containing allergens should be stored separately where possible
- ✔ Our top tip is to decant opened foods into a clearly labelled, sealed container and stored below other foods to reduce the risk of cross-contamination as much as possible

No — 4

## Cleaning



- ✔ An effective cleaning schedule needs to be followed, with extra care taken in areas where allergens are prepared and processed
- ✔ Use dishwashers to clean equipment where possible
- ✔ Before preparing allergen-free dishes, a two-stage clean consisting of a detergent and disinfectant should be use

No — 5

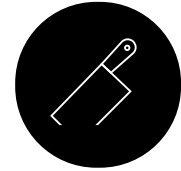
## Personal hygiene



- ✔ It's important that your staff always maintain standards of personal hygiene, especially when it comes to using soap and paper towels when handwashing
- ✔ If protective clothing gets contaminated with allergens, it should be changed as soon as possible
- ✔ Single use disposable aprons should be used where possible when preparing orders for anyone with allergies

No — 6

# Preparation



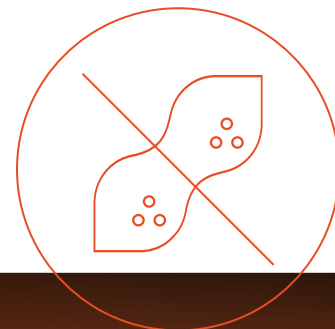
- ✔ It's really important to properly consider potential allergen cross-contact and how it can be eliminated
- ✔ To avoid cross-contact, it's best practice to designate a particular area of the kitchen for preparing allergen-free dishes – or, if this isn't possible, make sure proper cleaning is carried out between preparation
- ✔ Some businesses use colour-coded equipment for preparing allergen-free dishes, like knives, chopping boards and other equipment
- ✔ Busy and disorganised kitchens means more chance for cross-contamination, so to help with planning make sure you've asked group and advance bookings if they suffer from food allergies and identify anything they can't eat
- ✔ It's really important for chefs to follow set recipes at all times so nothing slips through the net

No — 7

# Cooking



- ✔ Make sure you're using separate oil fryers where possible – for example for products containing gluten – and label them correctly to reduce cross-contamination
- ✔ Use designated cooking utensils where possible such as frying pans, tongs and probes
- ✔ If you have fan ovens, cook allergen-free dishes separately to prevent contact



# Service



- ✓ Remember that garnishes, drizzling oils, dessert toppings and other finishing touches might also contain allergens and these need to be included in your allergen information

- ✓ Make sure the right dish is served to the right customer – use allergy flags or different coloured or shaped plates to help distinguish allergy orders

## A NOTE ON BUFFETS...

- If you offer food in a buffet form, you need to provide allergen information for each food item separately. The information needs to be visible, legible and accessible to the customer
- Food containing no allergens need to be properly separated and easily distinguishable from food that does contain allergens
- Make sure you provide enough utensils to prevent cross-contact

## ...AND ON DRINKS

- Remember drinks can also contain allergens, such as gluten, egg white, milk and sulphites
- Somewhere like a coffee counter is the perfect place for allergen cross-contact – so make sure there's separate equipment for allergen-free orders and equipment is being cleaned and wiped down between every single order

# Training



- ✔ Training was actually the most common non-conformance in the audit mentioned earlier, but according to the Food Information Regulations 2014, staff need to know how to deal with allergen requests
- ✔ In fact, according to our audit findings, **14%** of non-conformances related to team members not knowing enough about allergens, and **86%** related to team members not completing their allergen training within a specified timescale
- ✔ Staff need to:
  - Know the proper procedures when asked to provide allergen information
  - Be trained to accurately handle allergen information requests
  - Be able to guarantee that allergen-free meals are given to the right customer
  - Know the risks of allergen cross-contamination and how to prevent it
- ✔ It's really important that all your staff communicate properly – both front and back of house – to make sure allergens are taken seriously
- ✔ It's also a great idea to appoint an **allergy hero** – someone who's trained in depth on allergens and procedures. Having one means that the rest of the team will know who to go to for anything concerning allergens, and reassures your customers that you're dedicated to allergen management



# 'Free-from' foods

Free-from food is manufactured for people who avoid certain foods to protect their health, or because of their own personal dietary choices. They might use substitute ingredients like tapioca, rice or potato instead of gluten-containing flour, or soya, rice or coconut instead of milk.

Free-from claims need a combination of:

- Strict supply standards to make sure all raw materials are free from the claimed allergen
- Strict storage, handling, production and packing controls on-site to make sure there's complete segregation and no risk of any cross-contact

## DON'T RELY ON THE 'VEGAN' LOGO!



It's really important that you don't rely on the vegan logo and assume a product will be free from milk, fish, crustaceans, molluscs or eggs – and always check with manufacturers that a product is allergen-free before making any claims.

In 2017, Celia Marsh – who had a severe milk allergy – passed away after eating a Pret A Manger wrap that was labelled vegan but contained traces of dairy protein. The coconut yoghurt used in the dressing came from Australian brand CoYo that was licensed for manufacture in the UK to Planet Coconut. The coroner in the case stated that Planet Coconut had information that should've alerted them that the yoghurt may have contained milk, but this information wasn't passed onto Pret.

Want more information on making sure your supply chain meets your standards? Check out our [blog here](#)! Or, if you need a bit of help certifying your supply chain, [find out how Food Alert can help you do just that.](#)

## Further guidance on the 'vegan' logo

The Food and Drink Federation guidance advises that "the potential presence of inadvertent traces of non-vegan or non-vegetarian substances shouldn't be an obstacle to labelling a product as vegan or vegetarian...as long as reasonable measures are taken to prevent contamination".

The Vegan Society's vegan trademark can be used on food that has a 'may contain' statement – but you have to show robust evidence that the risk of cross-contact has been reduced as much as possible.

# How can Food Alert help?

We know you might be feeling a bit overwhelmed after reading all that – after all, there's a lot to think about and a lot to wrap your head around. So how can you make sure you're ticking all your boxes while saving time and money?

## Assure65 Recipe



Looking to take control of your menus? Our menu management software Assure65 provides accurate and live cost, nutrition and allergen data for all your recipes. Store each menu rotation, recipe and nutritional information in one place for easy use.

Assure65 Recipe also curates recipe cards to give your chefs instructions on how to prepare each meal – ideal for fast-paced and busy environments. And, if your supply chain changes, Assure65 Recipe will funnel any nutritional updates through to online menus and chefs immediately.

## Nutrition+



**Our smart solution to menu management designed with small businesses in mind**

With Nutrition+, you can input ingredient information (either by creating your own ingredients or pulling it from over 12,000 ingredient lists on the Erudus database), create your recipes and compile them into menus. You'll get allergen and nutritional information generated automatically, and then just publish the menu on your website for an easy customer experience.

## Menu checks and verification



There's a lot you need to think about when it comes to your menus, from nutritional to allergen verification and ingredient checks. Our qualified team are here to go through your menu with a fine-tooth comb for you, making sure all your claims are correct, your allergen information is up to date and you're complying with all the right legislation.



# Let us help you tick all your boxes while saving time and money

Luckily, you don't need to feel alone when it comes to allergen management. At Food Alert, we take allergen management seriously, and we're here to make sure you do too. Incorrect allergen management can be costly to your business, both financially and reputationally, so it's important that you get it right.

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