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Compliance in practice: how to meet your obligations to control food allergens

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FOOD INFORMATION TO
CONSUMERS REGULATION
NO. 1169/2011

Key facts

~1.92m people have food allergy in the UK (based on population of 63.1m). This figure excludes food intolerance

There is no cure, therefore need to observe avoidance

- Read ingredient labels
- Look out for hidden allergens



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Changes to Food labelling

- Moved from General Labelling Regulation (2000/13/EC) to Food Information for Consumers EU Regulation (1169/2011)
- New rules on allergen labelling applied from 13 December 2014
- Existing requirements for pre-packed foods were retained – but new requirement to **emphasize** allergenic foods in the ingredients list
- Introduced a **new requirement to provide allergy information for unpackaged foods**

**Which
ingredients
can cause
a problem?**



Cereals
containing gluten



Peanuts



Nuts



Milk



Soya



Mustard



Lupin



Eggs



Fish



Crustaceans



Molluscs



Sesame seeds



Celery



Sulphur dioxide

Mandatory particulars

Article 9(1)c - Any ingredient or processing aid listed in Annex II, or derived from a substance or product listed in Annex II causing allergies or intolerances, used in the manufacture or preparation of a food and still present in the finished product, even if in an altered form

Article 9(2) - The specified allergenic foods to be indicated with words and numbers - they may **additionally** be expressed by means of pictograms or symbols



Article 12 & 13 Clarity and Legibility

For prepacked foods, mandatory information to appear directly on the package or on a label attached to it

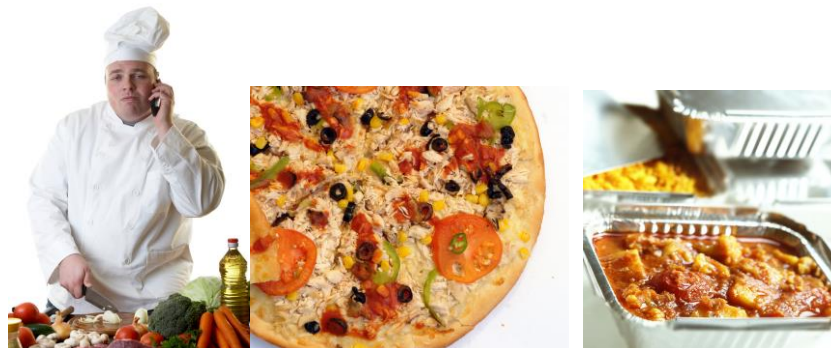
Mandatory food information to be available and easily accessible for all foods

Mandatory information to be marked in a conspicuous place, be easily visible, clearly legible and, where appropriate, indelible. It should not be hidden, obscured, detracted from or interrupted by other written or pictorial matter

Article 14 Distance selling

In the case of foods offered for sale by means of distance communication, mandatory food information **to be available before purchase is concluded** and to appear on the material supporting the distance selling or be provided through other appropriate means clearly identified by the food business operator

All mandatory information to be available at the moment of delivery



..... **Article 21 Labelling of allergens**

Unless exempt, **allergens to be in list of ingredients** with clear reference to name of the substance or product as listed in Annex II i.e. whey (milk)

Allergenic ingredients to be emphasized through a typeset that clearly distinguishes it from other ingredients by font, style or background colour

In the absence of a list of ingredients, allergenic ingredients to be declared with 'contains' and the Annex II allergen

Where several ingredients or processing aids in a food originate from a single allergenic ingredient, emphasise for each ingredient or processing aid concerned

Labelling: Before and After

Before

Spinach and Ricotta Pizza
A hand stretched pizza base, topped with tomato sauce, creamy spinach sauce, mozzarella cheese, ricotta cheese, marinated tomatoes, Regato cheese and sprinkled with black pepper

Cooking and storage

OVEN COOK **220°C** **200°C** **GAS 7**
11-12 mins 11-12 mins 11-12 mins

Preheat oven. Remove all packaging including base disc. Place pizza directly on shelf in centre of the oven.

OVEN COOK **200°C** **180°C** **GAS 6**
18-19 mins 18-19 mins 18-19 mins

Preheat oven. Remove all packaging including base disc. Place pizza directly on shelf in top of oven.

Do not reheat once cooled

Keep refrigerated. For use by date see front of pack. **Suitable for freezing on day of purchase. Use within 1 month.**

Allergens
Contains gluten and milk

Ingredients
Wheat flour, water, mozzarella cheese, tomatoes, spinach (6%), ricotta cheese (6%), semolina, milk, Regato cheese, tomato purée, whipping cream, rapeseed oil, extra virgin olive oil, salt, garlic, yeast, cornflour, sugar, black pepper, oregano, butter, nutmeg, muscovado sugar, white pepper

Per 1/3 pizza

Calories	Fat	Saturates	Salt	Sugars
415	15.4g	6.7g	1.44g	4.3g

Nutrition waitrose.com/nutrition

Typical values as sold	per 1/3 pizza	per 100g
Energy	1743kJ	941kJ
	415kcal	224kcal
Protein	18.3g	9.9g
Carbohydrate	50.7g	27.4g
of which sugars	4.3g	2.3g
Fat	15.4g	8.3g
of which saturates	6.7g	3.6g
Fibre	3.9g	2.1g
Sodium	0.57g	0.31g

Guideline daily amounts

	Women	Men
Calories	2000	2500
Fat	70g	95g
Saturates	20g	30g
Salt	6g	6g
Sugars	90g	120g

Vegetarian

Suitable for freezing

e 515g

After

A hand stretched pizza base, topped with tomato sauce, creamy spinach sauce, mozzarella, ricotta, Cheddar and Regato cheeses, marinated tomatoes and sprinkled with black pepper

INGREDIENTS: **wheat** flour (fortified with calcium carbonate, iron, niacin and thiamin), water, tomatoes, mozzarella cheese (**milk**), ricotta cheese (8%) (**milk**), spinach (7%), Cheddar cheese (**milk**), **wheat** semolina, **milk**, Regato cheese (**milk**), whipping cream (**milk**), rapeseed oil, tomato purée, extra virgin olive oil, garlic, salt, yeast, cornflour, sugar, black pepper, oregano, butter (**milk**), nutmeg, muscovado sugar, white pepper.

ALLERGY ADVICE: For allergens, including cereals containing gluten, see ingredients in bold.

NUTRITION			OVEN COOK	CHILLED
TYPICAL VALUES AS PREPARED	PER 100g	PER 1/3 PIZZA	GAS 7, 220°C, FAN 200°C	12-14 mins
Energy kJ	869	1470	Preheat oven. Remove all packaging including base disc. Place pizza directly on shelf in top of the oven. Do not reheat once cooled.	
Energy kcal	207	350		
Fat	8.3g	14.0g	OVEN COOK	FROZEN
of which saturates	3.5g	5.9g		
Carbohydrates	22.8g	38.6g	GAS 6, 200°C, FAN 180°C	18-19 mins
of which sugars	2.6g	4.4g		
Fibre	2.6g	4.4g	Preheat oven. Remove all packaging including base disc. Place pizza directly on shelf in centre of the oven. Do not reheat once cooled.	
Protein	9.0g	15.2g		
Salt	1.00g	1.69g		
waitrose.com/nutrition				

Pack contains three servings

RI = % of your daily reference intake

STORAGE: Keep refrigerated below 5°C. For use by date see front of pack.

Freeze as soon after purchase as possible and within the use by date. Use within one month.

We are committed to bringing you the best quality. Should you not be happy with this product, please bring the packaging back to any Waitrose branch and we'll replace your item and refund you.

Waitrose Limited, Boreham, Redbridge, Essex, UK. waitrose.com

VEGETARIAN

SLEEVE/BASE Card widely recycled

FILM Plastic not currently recycled

480ge
Food Standards Agency
food.gov.uk

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Article 44 - non-prepacked food

A new requirement for **allergen ingredients information** to be provided for **non-prepacked foods** and food provided **prepacked for direct sale**

Foods are offered to sale to the final consumer or to mass caterers without pre-packaging, or where foods are packed on the sales premises at the consumer's request or prepacked for direct sale, the provision of the information about allergenic ingredients is mandatory

..... Article 44 –non-prepacked foods cont'

Oral provision also permitted, provided the business indicates clearly that such information can be obtained upon request

Oral information must be **accurate**, **consistent** and **verifiable** upon challenge

What is consistent? Is there a process in place to enable consistent information to be provided? For example to refer queries to the nominated person(s)

What is verifiable? Ingredients information on a chart, recipe book, ingredients information sheets, scrap books with labels etc

Allergen information

All staff need to be able to provide accurate and consistent allergen ingredient information and know how to deal with questions from customers, or know to whom to refer such questions



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Typical analytical key questions to think about

What ingredients are used in a dish?

What allergenic foods are used in other dishes?

How are ingredients stored?

What shared equipment is used?

Spoons, serving tongs, chopping boards, woks, baking trays

Does the business know **what** allergy information is provided on ingredients they buy in?

How does the business make sure that their staff are able to provide accurate and consistent allergen information?

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Some different ways caterers could meet the requirements

Provide written information for each item listed on menus or blackboards – e.g. *‘chicken korma - contains almonds and milk’*

Have folders available to customers that contain recipes or product specification spreadsheets from catering suppliers for every dish being offered

Provide information as part of a discussion with customers **BUT** if adopting this approach, caterers must also have a notice on the menu, blackboard etc saying that allergy information is available from staff

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Signposting to allergen information















FOOD ALLERGIES and INTOLERANCES

Please speak to our staff about the ingredients
in your meal, when making your order.

Thank you.

..... Providing allergen information

DISHES AND THEIR ALLERGEN CONTENT - [INSERT THE NAME OF YOUR FOOD BUSINESS HERE]

DISHES														
	Celery	Cereals containing gluten	Crustaceans	Eggs	Fish	Lupin	Milk	Molluscs	Mustard	Nuts	Peanuts	Sesame seeds	Soya	Sulphur dioxide
Tuna Salad [example]	✓			✓	✓		✓		✓					

Review date:

Reviewed by:


















You can find this template,
including more information
at www.food.gov.uk/allergy

ALLERGENS: CHEF RECIPE CARDS

Dish/ingredient:

Date:

Chef:

 Celery <input type="checkbox"/>	 Cereals containing gluten <input type="checkbox"/>	 Crustaceans <input type="checkbox"/>	 Eggs <input type="checkbox"/>	 Fish <input type="checkbox"/>
 Lupin <input type="checkbox"/>	 Milk <input type="checkbox"/>	 Molluscs <input type="checkbox"/>	 Mustard <input type="checkbox"/>	 Nuts <input type="checkbox"/>
 Peanuts <input type="checkbox"/>	 Sesame seeds <input type="checkbox"/>	 Soya <input type="checkbox"/>	 Sulphur dioxide <input type="checkbox"/>	<p>TICK THE ALLERGENS WHICH ARE IN THE DISH</p> 

Notes:

Reviewed and checked by:

..... **Regular reviews, keep it current**

Food businesses need to have processes in place to ensure the information they provide is accurate

- Regularly review the ingredients information
- Where ingredients change, review the accuracy of the recipe
- Do garnishes or dressings change the allergenic profile of the meal? Check!
- Accuracy is dependent on the information on labelling, updating allergen information for dishes, updating staff and consumers

..... Communication is key

- Think about the chain of communication
 - The person buying the food
 - The person handling the food
 - The person taking the order
 - The person ordering the food



Communication is key

Engage with serving staff

Recipes change

Ingredients change

Curry killed my daughter: Father tells of heartbreaking moment he saw his 13-year-old die of takeaway allergy

- Teenager had peanut allergy and suffered from asthma
- Medics fought for four hours to save her

By EMILY ALLEN
UPDATED: 12:54, 20 October 2011
[Comments \(49\)](#) [Share](#)

The father of a schoolgirl who suffered a severe allergic reaction after eating a curry has told of the heartbreaking moment he realised she was going to die.

Molly Dyer, 13, of Whitefield, Bury, Greater Manchester, went into acute anaphylaxis and suffered a severe asthma attack after eating a chicken tikka masala, an inquest heard.

Friends had ordered the curry from the Shabaz Takeaway in Whitefield while Molly and her mother Meryl



Teenage girl with nut allergy killed by a takeaway curry

By DAILY MAIL REPORTER
UPDATED: 12:45, 24 November 2010

[Comments \(59\)](#) [Share](#) [Tweet](#) [Like](#) [114](#)

A teenage girl with a peanut allergy died after she had a fatal reaction to an Indian takeaway.

Emma Egerton, 18, who was home alone in Sale, Greater Manchester, called 999 and left the door open for the ambulance crew as soon as she realised the dish contained nuts.

But she was already unconscious when paramedics arrived and was pronounced dead in hospital later that night.



Schoolboy, 11, died after suffering extreme allergic nut reaction to Father's Day takeaway meal he had eaten several times before without problems

- Ethan Thomas collapses after eating favourite takeaway curry
- Nut allergy sufferer collapsed at home and later died in hospital
- Mother speaks about well-loved 'hilarious' son
- Parents urge others to take care with food and carry medication

11 October 2012

[40](#) [View comments](#)

A schoolboy died after suffering an extreme allergic reaction to nuts during a Father's Day meal.

The boy, Ethan Thomas, 11, of Leicestershire, collapsed at home after eating a takeaway meal and was pronounced dead in hospital later that night.

His mother, Judith, said: "He was a very happy, outgoing boy who loved his food. He was a bit of a nut lover, but he never had any problems with it before. We were all very shocked and sad to hear of his death."

A police officer father Rod and mother Judith when he died using the epiPen he carried as an emergency reaction - and rushed to hospital.

Mistakes can have fatal consequences!

Peanut curry death: Restaurant owner Mohammed Zaman jailed



A "reckless" restaurant owner has been jailed for six years for the manslaughter of a customer who had an allergic reaction to a curry.

Paul Wilson, 38, suffered a severe anaphylactic shock in January 2014 after eating a takeaway containing peanuts from the Indian Garden in Easingwold, North Yorkshire.

Mohammed Zaman, 52, was found guilty at Teesside Crown Court. The court heard he cut corners by using cheaper ingredients containing peanuts.

In what is thought to be a landmark trial, Zaman, of Aylesham Court, Huntington, denied he was responsible but a jury was told he switched almond powder for a cheaper ground nut mix, which contained peanuts.

Mr Wilson, a bar manager from Helperby, North Yorkshire, specified "no nuts" when he ordered a chicken tikka masala - an instruction which was written on his order and on the lid of his takeaway, the court heard.

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Points to consider for managing allergen risks

Deliveries and Labels

- Check that the food delivered matches your order
- Be aware of hidden ingredients

Storage and avoiding cross contamination

- Store foods that contain allergens separate from other foods and consider using clearly marked or colour coded containers
- Do not lose the original product description following unpacking, decanting and storage

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Points to consider for managing allergen risks

Preparing dishes

- Know ALL the ingredients in the food you handle
- Whenever preparing or serving food for a customer with an allergen, always:
 - Use a separate area to prepare the food
 - Wash your hands thoroughly
 - Check all ingredients including secondary ones
 - New oil when cooking food for those with a food allergy

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Video clip – Advice for businesses



<https://youtu.be/nfaTZ0k2AgA#sthash.WAhajpzV.dpuf>

..... Cross contamination with allergens

“May contain” can still be used for prepacked food and non-prepacked **after a thorough risk assessment** and to **communicate a real risk to the consumer**

Regulation No. 178/2002 General Food Law: Article 14, 2a. Food shall be deemed to be **unsafe if it is considered to be injurious to health**

To determine whether food is unsafe, consider information provided to the consumer, including information on the label or **information generally available to the consumer concerning the avoidance of specific adverse health effects** from a particular food or category of foods

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Statutory Rule

Food Information Regulations (Northern Ireland) 2014

<http://www.legislation.gov.uk/nisr/2014/223/made/data.pdf> An offence has been committed for failure to comply with allergen provisions

FSA guidance on the Food Information Regulations for food business operators and enforcement officers

<http://www.food.gov.uk/sites/default/files/fir-guidance2014.pdf>

FSA allergen guidance to support SME's

<http://www.food.gov.uk/sites/default/files/food-allergen-labelling-technical-guidance.pdf>

Recent changes to rules on gluten

- Regulation (EU) No. 828/2014 on specific requirements on the absence or reduced presence of gluten in food applied from 20 July 2016
- Gluten free or very low gluten for consumers has not changed and the legal limits relating to those claims remain the same.
- “No Gluten Containing Ingredients” and other factual statements **in addition** to those mentioned in Regulation (EU) No. 828/ 2014 cannot be used in any food labelling.

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Permitted phrases – Regulation 828/2014

“**Gluten-free**” (where the food as sold to the final consumer contains no more than 20mg/kg of gluten); or

“**Very low gluten**” (where the food, consisting of or containing one or more ingredients made from wheat, rye, barley, oats or their crossbred varieties which have been specially processed to reduce the gluten content, contains no more than 100 mg/kg of gluten in the food as sold to the final consumer).

Permitted phrases – Regulation 828/2014

Permitted additional statements:

- **“suitable for people intolerant to gluten” or “suitable for coeliacs”.**
- **“specifically formulated for people intolerant to gluten” or “specifically formulated for coeliacs”.**

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GUIDANCE, TOOLS AND TRAINING

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MenuCal

A free online tool to help food businesses in Northern Ireland;

- Comply with the law on allergen labelling
- Maintain up to date allergen information
- Calculate Calories for all their foods
- Display Calories correctly



Key features of Menucal

- Simple and free to use
- Includes training and user demos
- Stores information safely and securely
- Confidential for user
- Can be tailored to suit each business
- Useable via a phone or tablet
- Printable documents

For further detail on Menucal please contact our Executive Support Team

Email – executive.support@foodstandards.gsi.gov.uk



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Introductory video for

MenuCal



www.vimeo.com/140772906

E- learning



The impact of food *allergy*

[Home](#)
[Module 1: Rules and legislation](#)
[Module 2: In the body](#)
[Module 3: In the factory](#)
[Module 4: On the label](#)
[Module 5: In the restaurant](#)
[Module 6: Providing consumers with allergen information](#)
[CPD dashboard](#)

CPD dashboard

Please login to access your CPD dashboard and the module tests.

Email

Password

[Reset my password](#)
[Register](#)

In the restaurant

Visit our interactive restaurants to learn about identifying allergens in dishes typically found on the menu when eating out. Each restaurant has three dishes for you to choose from. The dishes have a list of allergens. Click on the allergens that you think would be found in the dish.

For the complete text, or if you don't have Flash installed, click on the information buttons instead.

Chinese

Visit our restaurant to test yourself on the three Chinese dishes.

Indian

Test yourself on the three Indian dishes at our Indian restaurant.

Mediterranean

Test yourself on the three Mediterranean dishes.

Deli Counter

Visit our deli to test yourself on the three dishes.

Test your knowledge

Register to take the multiple choice test and if successful you can download a CPD certificate.

Access free training on:
<http://allergytraining.food.gov.uk/>

Think Allergy

When someone asks you if a food contains a particular ingredient – always check.
From 13 December 2014, food businesses will need to provide information about allergenic ingredients in the food they serve.



1. 'Is there any egg in this?'



2. 'I don't know. I'll check.'



3. 'Do you know if this has any egg in it?'



4. 'I'll check.'



5. 'Yes, there is egg in it.'



6. 'Let me help you choose something else.'

Which ingredients can cause a problem?



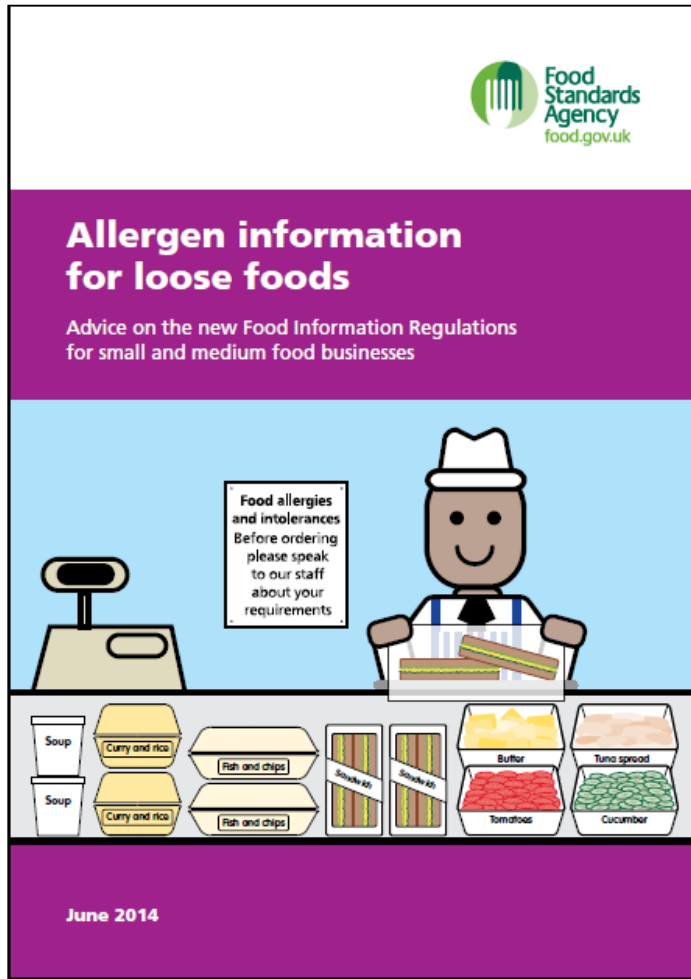
For more information and advice about allergy, visit: food.gov.uk/allergy
A booklet *Allergen Information for loose foods* is also available to download.

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<http://multimedia.food.gov.uk/multimedia/pdfs/publication/thinkallergy.pdf>



Supporting businesses – non-prepacked



Developed in collaboration with food industry and consumer support organisations

<http://multimedia.food.gov.uk/multimedia/pdfs/publication/loosefoodsleaflet.pdf>

..... Further information

FSA allergy pages for businesses: <http://www.food.gov.uk/business-industry/allergy-guide>

Resources for allergen information: <http://www.food.gov.uk/business-industry/allergy-guide/allergen-resources>

Allergy E-learning: <http://allergytraining.food.gov.uk/>

Safer Food Better Business for Caterers – Food allergies:

<http://www.food.gov.uk/multimedia/pdfs/publication/foodallergies-sfbb-0513.pdf>

BRC-FDF guidance for prepacked foods:

<http://www.brc.org.uk/downloads/Guidance%20on%20Allergen%20Labelling.pdf>

BRC-FDF guide on free from claims:

https://www.fdf.org.uk/corporate_pubs/brc-free-from-guidance.pdf



Thank you for listening