



# The Provision of Allergen Information for Non Pre-packed Foods

Voluntary Best Practice Guidance

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# Part 1: Foreword

## 1. Why is this guidance needed?

- 1.1 There is evidence that food allergies are becoming more common. The number of foods to which people react is extensive; however, the majority of reactions are associated with a relatively small number of foods.
- 1.2 Customers with food allergy and coeliac disease (gluten intolerance) need to know which foods they can eat safely. 'Pre-packed' foods are required by law to declare specified allergenic ingredients on the label. However, these requirements do not apply to foods which are sold unwrapped (for example, in restaurants, bakeries, deli counters or salad bars) nor to foods that are sold 'pre-packed for direct sale' (foods that are generally wrapped on the same premises as they are sold, such as meat pies or sandwiches packed on site).
- 1.3 Therefore, customers with food allergy sometimes find it difficult to choose suitable foods sold in these ways. The phrase '**non pre-packed food**' will be used in this guidance to cover these types of foods when they are sold in the retail sector and in catering businesses. In these situations customers with food allergy typically have to ask for ingredient information at the point of sale, or rely on any written information provided voluntarily by businesses.
- 1.4 Having an allergy to a food has a big impact on a person's life. If given the wrong information, the consequences could be serious as they could become seriously ill or even die.

## 2. What is the purpose of this guidance?

- 2.1 The purpose of this guidance is to provide best practise voluntary guidance to help businesses selling or providing non Pre-packed food, to learn how they can help customers with food allergy or intolerance. This guidance provides advice on how this might be done and also highlights potential problems.
- 2.2 The guidance outlines best practice so that businesses can, if asked, give their customers sufficient and accurate information. This will help customers with food allergy by reducing the risk of them having a reaction and will enable businesses to ensure that customers can make fully informed choices about the foods they eat.

### 3. Who is the guidance aimed at?

- 3.1 This voluntary guidance is relevant to all businesses that sell food non pre-packed (unwrapped) or pre-packed for direct sale, whether in catering establishments or through retail outlets. The guidance is also relevant to businesses providing food in institutional catering operations, such as schools, hospitals and prisons, as well as where food is provided at corporate events, or conferences. It will also be a helpful guidance tool for enforcement officers when advising businesses providing food that is non pre-packed. However, the guidance **should not be used as an enforcement tool**.

### 4. Where can I obtain further copies of this guidance?

- 4.1 This document is available from the Food Standards Agency website at <http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/> and can also be obtained from Food Standards Agency publications on telephone: 0845 606 0667 or email: [foodstandards@ecgroup.uk.com](mailto:foodstandards@ecgroup.uk.com).

## 5. Summary of Key Messages

### Communication

- If a customer with food allergy asks you about the ingredients in a food:
  - Never guess.
  - If you don't know, try to find out.
  - If you are unable to provide the information, say so.
  - If the information is unavailable, can you provide an alternative food?
- Always ensure all relevant staff are advised of any recipe changes or ingredient substitutions.

### Basic training of staff

- All staff should receive training on handling allergy information requests from their first day in the job.
- There should be an agreed practice for dealing with allergy information requests and all staff should know about this.

### Ingredient information

- Know the ingredients in the foods you sell.
- Make sure ingredients information is accessible to all staff.
- Make sure ingredients information is up-to-date.
- If you use part prepared ingredients, make sure you know what's in them.
- Consider the risk of allergen cross-contamination.

# Part 2: What you need to know about food allergy and intolerance

## 1. Food Allergy and Food Intolerance

### Food Allergy

- 1.1 The proportion of the population with true food allergy is estimated to be 1-2% of adults and about 5–8% of children, which equates to about 1.5 million people in the UK. Every year in the UK about 10 people are thought to die from allergic reactions to food although the true figures are likely to be higher. Many more people have to be treated in hospital.
- 1.2 The substance in a food that causes an allergic reaction in certain people is called an allergen. Allergens are normally proteins. Most allergic reactions to food are mild, but sometimes they can be very severe. It is important for all food businesses to be aware of food allergy and to take it seriously.
- 1.3 In some cases when someone eats a food they are allergic to, even the tiniest amount can potentially cause a very severe reaction. This reaction is called anaphylaxis. Severe allergic reactions are relatively rare and they are most commonly caused by only a handful of foods. The following allergenic foods have been identified as public health concerns across Europe. These are the allergenic foods that have to be declared when used as ingredients in pre-packed foods (this also includes any foods derived from the allergenic food for example, yoghurt or cheese made from milk):
  - **Peanuts** (also called groundnuts or monkey nuts)
  - **Nuts** (almond, hazelnut, walnut, cashew, pecan, Brazil, pistachio, macadamia and Queensland nut)
  - **Fish**
  - **Eggs**
  - **Crustaceans** (for example, crab, lobster, langoustine, prawn, shrimp)
  - **Sesame seeds**
  - **Milk**

- Soybeans
- Celery (including celeriac)
- Mustard
- Lupin
- Molluscs (for example, squid, octopus, mussels, cockles, periwinkles, snail)
- Cereals containing gluten (for example, wheat, rye, barley, oats, spelt and kamut)
- Added sulphur dioxide and sulphites at a level above 10 mg/kg (often used as a preservative for dried fruit and found in drinks)

- 1.3 Some people may ask about other foods or substances to which they are allergic and these should be treated with equal importance and in the same manner, for example, tomato, banana, kiwi fruit or latex (natural rubber, as used in rubber gloves).

#### Food Intolerance

- 1.4 Some people need to avoid certain foods because of a food intolerance rather than a true food allergy. Food intolerance is different from food allergy. It typically does not involve the immune system and is generally not life threatening. However, if a customer eats a food to which they are intolerant, this could make them feel very ill or affect their long-term health. For example, people with lactose intolerance need to avoid lactose (a sugar found in milk), because they lack the enzyme that breaks down this sugar. This causes symptoms such as diarrhoea, weight loss, bloating and anaemia.

#### Coeliac disease (gluten intolerance)

- 1.5 Some people need to avoid certain foods because of coeliac disease, which is a life-long auto-immune disease. About 1 in 100 people have coeliac disease and need to avoid gluten, a type of protein found in the cereals, like wheat, barley and rye. Some coeliacs are also sensitive to oats. They have symptoms such as wind, diarrhoea, constipation, tiredness, reduced growth, skin problems and this condition can also affect their long term health.

#### What are the symptoms of food allergy?

- 1.6 The symptoms can vary and their severity can change from one occasion to the next. Even very small amounts of an allergen can present a serious problem to some people with food allergy.

1.7 The most common symptoms of an allergic reaction are:

- Dry, itchy throat and tongue
- Itchy skin or rash
- Nausea and feeling bloated
- Diarrhoea and/or vomiting
- Wheezing and shortness of breath
- Swelling of the lips and throat
- Coughing
- Runny or blocked nose
- Sore, red and itchy eyes

Not all of those symptoms would necessarily occur in a single episode.

1.8 People with severe allergies can have a life threatening reaction called anaphylaxis. In its extreme form the body can go into shock (anaphylactic shock). When someone suffers anaphylaxis they can have symptoms in different parts of the body at the same time, including rashes, swelling of the lips and throat, difficulty in breathing, a rapid fall in blood pressure and loss of consciousness. Anaphylaxis can be fatal if not treated immediately, usually with an injection of adrenaline (epinephrine). People with severe allergies should take their medication with them wherever they go. For these people especially, it is very important that they are given accurate information about what is in the foods you are selling or providing if they are to avoid the risk of a severe reaction.

## 2. Legal Context

2.1 The following legislation requires the listing of certain named allergenic foods detailed in paragraph 1.2 or their derivatives to be labelled wherever these are used as ingredients in pre-packed food.

- Directive 2003/89/EC and implemented into UK law by the Food Labelling (Amendment) (No.2) Regulations 2004,
- Food Labelling (Declaration of Allergens) Regulations 2007

2.2 Currently there is no requirement to provide information on the allergen content of non pre-packed food. However, under the General Food Law Regulations 178/2002/EC there is a requirement that food must not be unsafe if placed on the market for sale. The Food Safety Act 1990 requires food to be of the nature,

substance and quality demanded by the customer. When you provide ingredient information, either when talking to customers or through a notice or label, it must be accurate. If the information you provide it is not accurate, you could be breaking the law. This guidance document is intended to give you the confidence to provide the accurate information that allergic customers need. This will be helpful for them and good for your business. Further details of these requirements are provided in Appendix I.

- 2.3 This guidance is voluntary and represents a best practice approach to providing allergen information for food that is non pre-packed.

### **3. Cross-contamination with food allergens**

- 3.1 Although this guidance is focused primarily on allergenic foods where they are used as intentional ingredients, it is important to be aware of allergen cross-contamination. Even a very small amount of allergenic food can be a risk for customers with a food allergy.

- 3.2 When someone asks if the product you are selling is free of the food they are allergic to, you also need to consider possible cross-contamination. You need to think carefully about this when considering whether you can provide a meal without the allergen present.

- 3.3 There are a number of things you can do to reduce the risk of cross-contamination:

- Thoroughly clean work areas, surfaces, serving areas and hands, to remove traces of food allergens.
- Ensure any utensils, equipment, chopping boards, and the like, that have been in contact with the food that the person is allergic to have been thoroughly cleaned with hot water and detergent.
- Use airtight containers to store food allergens and colour code them to make them stand out.
- Take steps to ensure that the area where the customer will eat the food is clean, for example, the table, crockery and cutlery.
- Avoid cross-contamination for example, with flour or crumbs that are easily carried from one dish to another.

- 3.4 It may not be possible to separate all the foods to which people are allergic. But, as best practice, you should be aware of where foods that can cause serious allergic reactions are coming into contact with non-allergenic ingredients.

- 3.5 It is important that if it is not possible to provide food without the allergen present, that you say so.
- 3.6 The Agency has produced best practice guidance on allergen management aimed primarily at dealing with cross-contamination of pre-packed foods. The principles set out in that guidance could also be used when preparing non pre-packed foods. See: <http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/alergyguidance>.

# Part 3: Advice for all businesses selling food that is non pre-packed

## 1. Introduction

1.1 There are three key messages relating to food allergy and your business:

- Effective Communication (with the customer, with suppliers and between staff)
- Basic Training for Staff
- Accurate Ingredient Information

1.2 Examples of some of the issues that may arise in different types of businesses that provide non pre-packed food are given in Appendix IV.

## 2. Effective Communication

2.1 Effective communication among your staff, with the customer and with your suppliers, is of paramount importance in ensuring that customers with food allergy have accurate information. The customer also has a responsibility to ask for information and relay their dietary needs to the person providing the food. Customers should make the final decision on whether or not to buy and eat a food, based on the information you provide.

2.2 In the absence of labels on non pre-packed food, the allergic customer who requires ingredient information is reliant on verbal communication with staff at the point of sale, or written information provided voluntarily (for example, on menus, display tickets or information boards). Effective communication is therefore vital and could help to ensure that a customer does not eat something that could risk their life.

2.3 Businesses need to think carefully about how to handle requests for information from a food allergic customer and how to make sure their staff have access to the requested information. It is essential that if a member of staff is asked about the ingredients of a food, they ensure that any information they provide is full and accurate. If the information is not available, they should say so. If in doubt, staff should be advised to ask another (more senior) member of staff before responding to the customer. Some businesses may be able to appoint 'allergy advisers' among

their staff so that someone is available at all times to answer requests for allergen information. It would be necessary to ensure contingency plans are in place for when these members of staff are not available.

- 2.4 If staff cannot obtain reliable information about the content of a food, **they should never guess**. Instead, they should tell the customer they are unable to provide the information requested and cannot be sure that the food in question is free of the ingredient concerned.
- 2.5 In some situations, it may be possible for a special meal not containing that allergen to be prepared, particularly if the customer gives the business prior warning. For example, it may be relatively easy for a restaurant to provide a salad without nut oil dressing (for someone who is allergic to nuts), or a meat dish without a sauce containing flour for someone who has coeliac disease. The business will need to consider any possibility of cross-contamination as well as the ingredients used when preparing an alternative dish.
- 2.6 Self-service finger buffets are particularly problematic due to the risk of cross-contamination. If a business knows in advance that an allergic customer will be present (this is often the case for this type of event) a suitable selection from the buffet should be selected beforehand and held separately for the customer.
- 2.7 Some customers may find it difficult to tell staff that they have a food allergy, and may feel awkward, not wanting to make a fuss. Businesses should look at ways to make customers feel more comfortable about asking for information. This could be in the form of a poster, or a statement put on the menu, letting customers know that the establishment is happy to help with food allergy requests. For example:

*“If you require further information on the allergen content of our foods please ask a member of staff and they will be happy to help you.”*

## Practical steps to be taken

The following practical steps should be considered by a business when responding to customers with food allergies.

### Communication with the customer who asks for ingredients information

- There needs to be an agreed procedure for dealing with food allergy requests so that front-line staff know how to handle these and don't give wrong or incomplete information to the customer.
- If the customer gives notice of their food allergy before visiting the establishment, steps should be in place to ensure that front office staff relay this information to both restaurant and kitchen/food preparation staff.
  - Ensure the chef/person preparing the food has been told, which allergens the customer needs to avoid.
  - The member of staff who will be serving the customer should be made aware that a specially prepared meal is to be served.
- If a customer asks about the ingredients of a food, the member of staff dealing with the query will need to decide who the best person is to deal with it.
  - Does the business have a designated person to deal with allergy related requests?
  - If the member of staff approached is unsure how to answer the query, they should consult another (more senior) member of staff who may be trained in this area.
  - Staff should never guess about the ingredient content of foods. They need to know where to get the most accurate information.
  - If they are unable to give the information to the customer, they should say so.
  - If unable to provide the information, is there an alternative choice, or could a product or dish that does not contain the allergenic food be specially prepared or supplied?
- The person dealing with the query/request will need to find out:
  - Whether the food in question contains the ingredient the customer asked about? Can they ask the person who prepared the food or the allergy representative in the business?
  - Is full ingredient information for each product the business provides recorded and retained somewhere? Can the customer have access to this information to make their own decision about whether it is safe for them?
  - Are there any 'may contain' statements on the labels of products bought from suppliers? If so, the customer should be informed.
  - Is there a possibility of cross-contamination? If this cannot be prevented, tell the customer so they can make their own decisions.

- Before responding to a customer request, serving staff must always ask the staff preparing the food whether a dish contains a particular ingredient – even if they have asked the same question on a previous occasion. This is because ingredients may have changed because of a new or altered recipe, changed suppliers, substituted products etc.
- Menu descriptions should be accurate, descriptive and kept up to date.
  - Where possible, allergens should be mentioned in the menu description, for example, coffee gateau with hazelnuts or risotto with cheese and breadcrumb topping.
- Any information given to the customer should be accurate. If there are any doubts, the customer should be informed.
- Staff should never guess and never say that a product does not contain a particular ingredient unless they are sure it does not.
- If a customer has indicated they have a food allergy, any food they eat should not have been displayed in contact with foods that contain ingredients to which they are allergic, as this may lead to the possibility of cross-contamination.
  - Consider opening a new packet of a product e.g. a dessert to ensure cross-contamination has not occurred whilst on display.
  - Also, utensils and preparation surfaces should be cleaned to ensure the allergen is not present.

### Key Messages from this Section

- If a customer asks you about the ingredients in a food:-
  - Never guess.
  - If you don't know, try to find out.
  - If you are unable to provide the information, say so.
  - Can you provide an alternative food?
- Always ensure all relevant staff are advised of any recipe changes or ingredient substitutions.

## 3. Basic Training for Staff

- 3.1 Businesses need to ensure that staff understand the seriousness of food allergy and the importance of giving accurate information about the allergen content of food ingredients.
- 3.2 All businesses will have different strategies for training their staff. Businesses should ensure as a minimum that their staff are aware of the procedures and policies of the business for handling allergy-related requests for information. Businesses may also

choose to highlight the issues with allergies through training courses and the free training materials that are available from local councils or other providers (such as this guidance or the allergies safe method in the Safer Food, Better Business pack for caterers or retailers available at <http://www.food.gov.uk/sfbb>). This should apply both to permanent, full and part time staff, and contracted or temporary staff.

- 3.3 No matter what size the business is, or what training support mechanisms have been adopted, it is important to ensure that, from their first day in the job, all staff, including temporary staff, receive sufficient instruction about food allergy so that they know how to handle queries from food-allergic customers.
- 3.4 All staff, whatever their work responsibilities, should be made aware that food allergy issues must be taken seriously and that they will, at the very least, need to know what they should do if they are approached for information by an allergic customer. Points to remember are:
- Serving staff will be most likely to have direct contact with customers with food allergy and they will need adequate training and up-to-date information.
  - Other staff, such as those clearing tables, may also come into contact with customers and should know how to handle requests from customers with food allergy.
  - It is important that staff preparing foods (such as Chefs) also understand the importance of knowing what ingredients have been used in each food, so they can make this information available to serving staff if required.

#### What to do if you think someone is having an allergic reaction

- 3.5 All staff should know what to do if they think a customer may be having an allergic reaction. Whether they are having an allergic reaction is not always clear because other serious conditions can have similar symptoms. But, even if you're not sure what the problem is, if a customer is finding it hard to breathe, if their lips or mouth are swollen, or if they collapse, you should:
- Contact the first aider in your organisation, if you have one;
  - call 999 immediately and describe what is happening;
  - explain that you think the customer may be having a serious allergic reaction;
  - do not move the customer, because this could make them worse; and
  - send someone outside to wait for the ambulance and stay with your customer until help arrives.

- 3.6 There are three key food allergy messages that should be conveyed to all staff from the first day of work.

#### Allergy messages to be conveyed to all staff

- **Food allergy must be taken seriously.**
  - The consequences of giving the wrong information to the customer could make them ill or even kill them.
- **Everyone will need to know the agreed practice for dealing with allergy information requests.**
  - Some businesses may have a designated staff member trained in allergy and this is encouraged, where possible.
- **Members of staff must give clear information to the customer if they ask about the ingredients in foods.**
  - If you cannot give the required information, say so.
  - Never guess about the ingredient content of foods.

#### Key Messages from this Section

- All staff should receive training on handling allergy requests from their first day in the job and receive refresher training.
- There should be an agreed system for dealing with food allergy information requests and all staff should know about this.

## 4. Ingredient Information

- 4.1 Businesses need to ensure that they know exactly what ingredients have gone into which foods so this information can be relayed to a customer who asks. To do this, information about the ingredients of the foods you are selling should be available.
- 4.2 Non pre-packed foods are exempt from meeting most of the general food labelling requirements. However, most foods being supplied to businesses will be accompanied by ingredients information. This could be on the packaging itself, provided electronically or on the documentation delivered alongside the goods. Retaining this information where provided is important and you may consider making it available to customers on request.

- 4.3 It is advisable to develop good working relationships with your suppliers. This should allow you to gain further information on the ingredients used in products that have been bought in. It is also important to keep information on the ingredients present in foods that you are preparing from a recipe.
- 4.4 The following list of questions should be considered for each of the foods you sell. This initial step will help to start the process of identifying ways of managing allergen ingredient information.

How do you sell your product?	
<ul style="list-style-type: none"> <li>Do you buy in the product already packed and sell it in the original wrapping, for example packets of crisps?</li> </ul>	Allergen information is required by law on the packaging – <b>Point the customer to this information.</b>
<ul style="list-style-type: none"> <li>Do you buy the product and remove the packaging and possibly process (for instance, cut into portions, re-heat or cook) before offering for sale to the customer, for example, ready made desserts, quiches or meat pies?</li> </ul>	Allergen information will be on the packaging, stored electronically or on the documentation delivered with the food - <b>Ensure this information, where available, is accessible to staff.</b>
<ul style="list-style-type: none"> <li>Do you make it from your own recipe for example, deserts, quiches, or meat pies?</li> </ul>	You should ensure that you have ingredients information for each component of the food. <b>Ensure this information is accessible to staff.</b>

- 4.5 You should not assume you know the ingredients of the products bought in always check because foods that can cause severe allergic reactions can be found in products where you might not expect them. See the table of examples overleaf.

Example Food	Possible Allergenic Ingredient
Pesto	Peanuts or nuts and milk (cheese).
Cakes, desserts, pastries & biscuits	Wheat flour contains <b>gluten</b> . Marzipan/frangipane are both made from <b>almond</b> . Praline is made from <b>hazelnuts</b> . <b>Peanuts</b> .
Pastry cases, pies, waffles, pancakes, crepes, galettes, products containing crumb, pizzas, and coated vegetables for deep frying (such as onion rings and mushrooms)	Wheat flour ( <b>gluten</b> ). Can sometimes contain <b>lupin</b> flour, especially if made on the continent.
Breads & Bread Rolls	Wheat flour ( <b>gluten</b> ) and can contain <b>nuts</b> or <b>seed</b> ingredients. <b>milk/egg</b> as a glaze.
Cheese cake bases	Wheat flour ( <b>gluten</b> ) and can contain <b>nuts</b> to make them crunchier.
Stock cubes, gravy granules & sauces	Can contain a thickener, <b>wheat</b> flour ( <b>gluten</b> ) and also contain <b>milk</b> as well as <b>celery</b> and <b>mustard</b> .
Burgers, sausages,	Can contain <b>soya</b> or <b>wheat</b> flour/ <b>rusk</b> ( <b>gluten</b> ) and <b>egg</b> .
Vegetarian products (such as vegetarian mince)	<b>Soya</b> , <b>wheat</b> flour and <b>barley</b> malt ( <b>gluten</b> ) and sometimes <b>egg</b> .
Satay	<b>Peanuts</b> , mayonnaise (contains <b>egg</b> and can be thickened with flour containing <b>gluten</b> ).
Coronation chicken filling	Can contain <b>almonds</b> or <b>peanuts</b> and mayonnaise ( <b>egg</b> and <b>gluten</b> ) in some recipes.
Salad dressings	Unrefined <b>nut</b> oils (e.g. <b>hazelnut</b> , or <b>walnut</b> ), seed oils (e.g. <b>sesame</b> ) or cheese ( <b>milk</b> ), <b>mustard</b> , <b>wheat</b> flour ( <b>gluten</b> ), fish (anchovies).

Example Food	Possible Allergenic Ingredient
Worcestershire sauce	Can contain <b>fish</b> , <b>nuts</b> or <b>barley malt (gluten)</b> .
Soy sauce	This contains <b>soya</b> and it usually contains <b>gluten</b> .
English Mustard	Usually contains <b>wheat flour (gluten)</b> .
Beers, lagers, stouts, ales	Usually contain <b>barley (gluten)</b> .
Cider and wine	Often contain <b>sulphites</b> .
Malt vinegar	This contains <b>barley malt (gluten)</b> .
Prawns	Can contain <b>sulphites</b> .
Indian Dishes	Can be thickened with ground <b>almond</b> or <b>peanut</b> flour and may be garnished with chopped <b>nuts</b> .
Spaghetti Bolognese	Often contains <b>celery</b> . Contains pasta ( <b>wheat/gluten</b> ).
Houmous	Can contain tahini (made from <b>sesame seeds</b> ).
Tofu	Is <b>soya</b> .

- 4.6 It is also important to take note of any ‘may contain’ warnings and include this in the information you give to the customer, if they ask about the allergen content of the food.

#### Locating ingredient information

- 4.7 You will need to consider how your staff can find ingredient information. Here are a few examples of how this could be done:

Type of Business	Examples of How Information May be Located
Large retailers and catering chains	<ul style="list-style-type: none"> <li>- Electronic specification.</li> <li>- Head Office may hold information centrally.</li> </ul>
Restaurants, canteens, pubs and small retailers	<ul style="list-style-type: none"> <li>- On the packaging of ingredients used.</li> <li>- Documentation delivered with the goods.</li> </ul>
Fast Food Outlets	<ul style="list-style-type: none"> <li>- Head Office may hold information centrally.</li> </ul>
Small sandwich bars, coffee shops, hot dog stalls	<ul style="list-style-type: none"> <li>- On the packaging of ingredients used.</li> </ul>

- 4.8 Businesses will need to store ingredient information in the most effective way, so it is immediately accessible to staff when needed. The following list of key points may help with this process:

### How to Keep and Access Allergy Information

- Keep ingredient information for all foods that you prepare from a recipe.
- Keep a copy of the ingredient information on labels of pre-packed foods for example, sauces, desserts etc.
- Keep ingredients in the original containers where possible, or keep a copy of the labelling information in a central place (paper or electronic).
  - Remember to ensure that staff who need to know are aware of where this information is stored and how it is kept.
  - Ensure that the information is kept up to date (for example, if recipes are changed or products substituted).
  - Large businesses may hold this information centrally for instance, in a Head Office. In this instance, staff will need to know who they should contact if ingredients information is required.
  - Suppliers can be contacted via their helplines for ingredient information.
- Always check deliveries to make sure what is delivered is what was ordered and ensure that the relevant labelling information is with the delivery ordered.
  - If it isn't, ask the supplier to provide this information.
- Check that the food delivered is the same brand that is normally used, as different brands might have different ingredients. Ensure that any records are updated accordingly.
- Look to see if the supplier has given information about any changes in ingredients of the foods delivered.
- If food is delivered in bulk and then decanted into other containers, does the labelling information go with it?
  - Ensure these containers are clearly labelled.

### Things to be Aware of

- Is the packaging intact?
  - Is the ingredients information missing, inaccurate or hard to read?
- Staff will need to be aware if the ingredients of a food product have changed for example, if the usual brand has changed or the recipe has changed. Does the new recipe contain different allergenic ingredients?
- Small amounts of a food that can cause severe allergic reactions can get into other foods for example, if containers are not securely closed or when foods are being moved from storage into the kitchen.
- Is there an allergy advisory statement 'may contain' on the label?

### Key Messages from this Section

- Know the ingredients in the foods you sell.
- Make sure ingredients information is accessible to all staff.
- Make sure the ingredients information is up to date.
- If you use part prepared ingredients, make sure you know what's in them.

# APPENDIX I: Legal Context and terms used in this guidance

This guidance provides up to date information available at the time of publication. The legislation can be amended over time. For the latest legal position please see the Food Standards Agency's website [www.food.gov.uk](http://www.food.gov.uk).

## 1. What is the background to the EU and National Legislation?

- 1.1 The labelling of most food in the UK is governed by the provisions of the Food Safety Act 1990 (as amended) and the Food Labelling Regulations 1996 (as amended). These implement Directive 2000/13/EC of the European Parliament and of the Council on the labelling, presentation and advertising of foodstuffs.
- 1.2 From 26 November 2004, the Food Labelling (Amendment) (England) (No.2) Regulations 2004, amended the Food Labelling Regulations 1996 to implement the Directive 2003/89/EC of the European Parliament and the Council of 10 November 2003. Parallel legislation implemented the EC rules in Scotland, Northern Ireland and Wales. All pre-packed foods had to comply with these new rules from 25 November 2005. From 23 December 2007 the Food Labelling (Declaration of Allergens) (England) Regulations 2007, and comparable legislation in Scotland, Wales and Northern Ireland came into force. This legislation implements Directive 2006/142/EC.
- 1.3 These new Regulations introduced a specified list of allergens. Pre-packed foods (including alcoholic drinks) made using these allergens, or their derivatives, must indicate the use of these ingredients, making a clear reference to the source allergen. The list of allergens comprises cereals; containing gluten (wheat, rye, barley, oats, spelt, kamut and their hybridised strains), crustaceans, molluscs, eggs, fish, peanuts, lupin, soyabean, milk, nuts (almond, hazelnut, walnut, cashew, pecan, Brazil, pistachio, macadamia and Queensland nut), celery, mustard, sesame seeds and sulphur dioxide and sulphites at more than 10mg/kg or 10mg/litre.
- 1.4 For further information please see the Agency's guidance notes on Allergen and Miscellaneous Labelling Provisions: <http://www.food.gov.uk/industry/guidancenotes>.

- 1.5 However, there are some ingredients derived from the list of allergenic foods, which are exempt from this labelling. These have been identified by the European Food Safety Authority (EFSA), as derived ingredients which on the basis of the scientific evidence submitted are unlikely to cause an allergic reaction. For further information, please see the Agency's guidance on the Allergen and Miscellaneous Labelling Provisions<sup>1</sup>: <http://www.food.gov.uk/foodindustry/guidancenotes>.
- 1.6 The Directive 2000/13/EC gave Member States the option not to apply EC labelling rules in the case of foods that are 'non pre-packed' or 'pre-packed for direct sale', as long as the customer receives sufficient information. This option was taken up by the UK.

## 2. What does 'Pre-packed', 'Pre-packed for Direct Sale' and 'Non Pre-packed' Mean?

- 2.1 The terms 'pre-packed' and 'pre-packed for direct sale' are defined in Regulation 2 of the Food Labelling Regulations 1996 (as amended). Below we have provided an interpretation of the definitions based on this legislation. Full information on the definitions can be found at:  
<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/foodlab elregsguid>
- 2.2 **'Pre-packed'** foods are foods, which have been put into packaging before sale, normally at a site separate from that where the product is sold to the customer, where there is no opportunity for direct communication between producer and customer. For example, most pre-packed foods sold in supermarkets will fall under this definition, such as tinned food, ready made meals or frozen food products. Foods sold in this way are covered by legislative requirements on allergen labelling and are outside the scope of this guidance. For further information, please see the Agency's guidance notes on the Allergen and Miscellaneous Labelling Provisions: <http://www.food.gov.uk/foodindustry/guidancenotes>.
- 2.3 Foods sold **'pre-packed for direct sale'** generally means those foods that have been packed on the same premises as they are being sold. In these situations, it is thought that the customer would be able to speak to the person who made/packed the foods to ask about ingredients and so these foods do not generally have to be labelled with ingredients by law. Foods which could fall under this category are meat pies made on site, and sandwiches made and sold pre-packed or not pre-packed from the premises in which they were made.

<sup>1</sup> This is being updated by a Directive which will require businesses to be compliant with a new list of exempt derived ingredients by 31 May 2009.

- 2.4 Although non pre-packed foods is not defined in legislation, a useful working definition is foods which are sold loose, for instance, non-wrapped. In a retail environment this would apply to any foods which are sold loose from a delicatessen counter (for example, cold meats, cheeses, quiches, pies and dips), fresh pizza, fish, salad bars, bread sold in bakery shops etc. In a catering environment this would apply to foods which are sold not pre-packed for example, from a canteen or meals served in a restaurant or from a takeaway.

### **3. What are the Statutory Labelling Requirements for Foods Sold Pre-packed for Direct Sale and Non Pre-packed?**

#### **Food Labelling Regulations 1996 (as amended)**

- 3.1 Regulation 23 of the Food Labelling Regulations 1996 (as amended) deals with foods sold pre-packed for direct sale or not pre-packed. Foods sold in this way are exempt from some of the general labelling requirements, including the indication of allergenic ingredients.
- 3.2 Regulation 27 of the Food Labelling Regulations 1996 (as amended) deals with foods sold pre-packed for direct sale or not pre-packed at a catering establishment (see below paragraph for definition of a 'catering establishment' under the regulations). Foods sold in this way are exempt from some of the general labelling requirements, including the indication of allergenic ingredients.
- 3.3 For further information, please see the Agency's guidance on the Food Labelling Regulations 1996 (as amended):  
<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/foodlabelregsguid>

### **4. What are the Requirements Under the General Food Law Regulations 2004 (as amended) and the Food Safety Act 1990 (as amended)?**

#### **The General Food Law Regulations 2004 (as amended)**

- 4.1 The General Food Regulations 2004 (as amended) make it an offence to contravene or fail to comply with certain requirements under EC Regulation 178/2002, in particular that:
- Food placed on the market should not be unsafe, (being either injurious to health or unfit for human consumption). In determining whether a food is injurious to health, regard shall be had, amongst other things, to the particular health sensitivities of a specific category of consumers where that food is intended for that category of consumers;

- Labelling, advertising and presentation of food, including its shape, appearance and packaging, the packaging materials used, the manner in which they are arranged and the setting in which they are displayed, and the information which is made available about them through whatever medium, shall not mislead customers.
- 4.2 The statement about the considerations when deciding if the food is injurious to health is talking about when a product is aimed at customers with a specific health conditions such as an allergy e.g. free from foods. However, it would also apply where someone has requested a meal without a specific food ingredient, for example nuts, and the business has agreed to provide this.

#### Food Safety Act 1990 (as amended)

- 4.3 The Food Safety Act 1990 (as amended) makes it an offence for anyone to:
- sell, or possess for sale, food which is falsely described, advertised or presented;
  - sell, or possess for sale, food which is not of the nature, substance or quality demanded; and
  - sell to the purchaser's prejudice any food which is not of the nature, substance or quality demanded by the purchaser.
- 4.4 For further information on the Food Safety Act 1990 (as amended) and the General Food Law Regulations 2004 (as amended), please refer to the Agency guidance notes at:  
<http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/generalfoodlaw>.

## APPENDIX II: Examples of issues that may arise in different types of businesses providing foods that are non pre-packed

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## Section 1: Sandwich Bars

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the menus or tickets, consider including any major allergen in the name of each dish**
  - For example, "Coronation chicken sandwich with **almonds**".
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, when preparing a gluten free sandwich with gluten free bread have breadcrumbs (**gluten** or **wheat**) or seeds transferred from other foods?

Food for thought	Notes
<p><b>BREAD OR TORTILLA WRAP</b> What ingredients were used?</p>	<ul style="list-style-type: none"> <li>● All breads usually contain <b>wheat</b> flour/<b>gluten</b>.</li> <li>● For example, is the bread topped with <b>sesame</b> oil or <b>sesame</b> seeds?</li> <li>● Does the bread contain <b>soya</b> or <b>lupin</b> flour along with <b>wheat</b> flour (<b>gluten</b>)?</li> </ul>
<p><b>BUTTER OR SPREAD</b> Has a spread been used in the sandwich? Do you know the ingredients of the spread?</p>	<ul style="list-style-type: none"> <li>● For example <b>milk</b> or <b>soya</b>.</li> </ul>
<p><b>FILLING</b> Do you know the ingredients of the sandwich filling?</p>	<ul style="list-style-type: none"> <li>● For example does the coronation chicken filling contain <b>nuts</b> or <b>peanuts</b>?</li> <li>● Are there other allergenic foods such as <b>prawns</b>, <b>fish</b> or <b>egg</b>?</li> <li>● Do any fillings use mayonnaise as a base, in which case <b>egg</b> or <b>milk</b> may be among the ingredients?</li> </ul>

## Section 2: Restaurant (Carvery)

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider these points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the menu, consider including any major allergen in the name of each dish**
  - For example, "Roast turkey with a **nut** stuffing and **battered** vegetables".
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example, **nut** cutlets, scampi or **battered/breaded** fish).
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this, possibly by putting a notice by the food.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, when staff are serving nut stuffing with the meat, ensure they use separate implements. Or consider serving customers with an allergy with food straight from the kitchen that has not been in contact with the food they are allergic to.
  - Note that if customers can serve themselves to parts of the meal (e.g. vegetables) then there is a risk of cross-contamination.

Food for thought	Notes
<p><b>MEAT</b></p> <p>How was it cooked?                      Was anything added during preparation or cooking that contains a major allergenic food?                      If a marinade was used, does it contain any allergenic ingredients?</p>	<ul style="list-style-type: none"> <li>● For example, <b>nut</b> stuffing that also contains <b>breadcrumbs (gluten)</b>, a marinade or garnish.</li> <li>● Was Worcester sauce used? (can contain <b>fish, nuts</b> and <b>barley malt</b>).</li> <li>● For example, <b>soy</b> sauce or <b>mustard</b> (both contain <b>gluten</b>).</li> </ul>
<p><b>ROAST POTATOES</b></p> <p>How were they prepared?                      Do they have a coating?</p>	<ul style="list-style-type: none"> <li>● For example, are they coated in <b>nut</b> oil or <b>butter</b>?</li> <li>● Were they cooked in butter (which contains <b>milk</b>)?</li> <li>● Were they cooked in <b>nut</b> oil or <b>butter</b>?</li> </ul>
<p><b>VEGETABLES</b></p> <p>What were they cooked in?                       Was anything added?</p>	<ul style="list-style-type: none"> <li>● For example, were they cooked in <b>nut</b> oil or <b>butter</b>?</li> <li>● For example, <b>butter</b> glaze, breadcrumbs, croutons or sauces thickened with <b>wheat</b> flour (<b>gluten</b>).</li> </ul>
<p><b>GRAVY AND SAUCES</b></p> <p>What ingredients were used?</p>	<ul style="list-style-type: none"> <li>● Were they thickened with <b>wheat</b> flour (<b>gluten</b>)?</li> <li>● Did you use stock cubes or gravy granules? Check the ingredients.</li> </ul>
<p><b>STUFFING</b></p> <p>What ingredients were used?</p>	<ul style="list-style-type: none"> <li>● For example, does it contain breadcrumbs (<b>wheat/gluten</b>)?</li> <li>● Does it contain <b>nuts</b>?</li> </ul>
<p><b>SALADS</b></p> <p>Consider what oils and dressings are used?</p>	<ul style="list-style-type: none"> <li>● Check the ingredients for allergenic foods such as <b>nuts, sesame, egg, milk</b> and <b>mustard</b>.</li> </ul>
<p><b>DESSERTS</b></p> <p>Do any desserts contain nuts or other allergenic foods?                       Are there cross-contamination risks?</p>	<ul style="list-style-type: none"> <li>● For example, are <b>nut</b> desserts on the sweet trolley in close proximity to other desserts?</li> <li>● Can you prevent cross-contamination (e.g. using a glass cover and separate serving utensils)?</li> <li>● If not, ensure the allergic customer is aware of the risk.</li> </ul>

### Section 3: Fast Food and Fixed Menu Restaurants

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

#### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for holding ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the menu, consider including any major allergen in the name of each dish**
  - For example, "Beef burger in a **sesame** bun".
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example, **nut** cutlets, **scampi** or **battered/breaded fish**).
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, ensuring the fries are not cooked in oil used for **breaded fish**.

Food for thought	Notes
<p><b>BREAD OR BUN</b></p> <p>Do you know the ingredients of the bun?</p>	<ul style="list-style-type: none"> <li>● For example, is the bread topped with <b>sesame oil</b> or <b>sesame seeds</b>?</li> <li>● Does the bread contain <b>soya</b> or <b>lupin</b> flour along with <b>wheat</b> flour (<b>gluten</b>)?</li> </ul>
<p><b>BURGER</b></p> <p>If it is a meat burger, do you know the ingredients?</p> <p>Do you know how the burger has been cooked?</p> <p>If it is a chicken, or veggie burger or breaded fish, do you know the ingredients?</p>	<ul style="list-style-type: none"> <li>● For example there may be <b>wheat</b> flour or rusk (<b>gluten</b>) in the meat.</li> <li>● Has the burger been cooked in oil that was used previously to cook other products such as <b>nut</b> burgers or <b>breaded fish</b>?</li> <li>● Are they coated with <b>batter</b> or <b>breadcrumbs (wheat/gluten)</b>?</li> <li>● Have <b>eggs</b> been used to bind ingredients?</li> </ul>
<p><b>RELISH</b></p> <p>Do you know the ingredients of the mayonnaise?</p> <p>Do you know the ingredients of the tomato sauce or relish?</p>	<ul style="list-style-type: none"> <li>● For example, are <b>egg</b>, <b>mustard</b> or <b>wheat</b> flour (<b>gluten</b>) used?</li> <li>● Are <b>soya</b> or flour (<b>wheat/gluten</b>) present? Are there other vegetables in the relish such as <b>celery</b>?</li> </ul>
<p><b>SALAD</b></p> <p>Is the salad coated in a dressing and do you know its ingredients?</p>	<ul style="list-style-type: none"> <li>● For example <b>egg</b>, <b>milk</b> or <b>nut oils</b> or <b>mustard (wheat/gluten)</b>.</li> </ul>
<p><b>FRIES</b></p> <p>Are the fries coated?</p> <p>Has the cooking oil been used to cook anything else?</p>	<ul style="list-style-type: none"> <li>● For example, <b>wheat</b> flour (<b>gluten</b>) or <b>milk</b>.</li> <li>● For example, <b>nut</b> burgers, <b>battered/breaded fish</b>, onion rings (<b>lupin</b> flour), or foods coated in <b>breadcrumbs (wheat/gluten)</b> or a <b>batter (egg, milk, wheat/gluten)</b>.</li> </ul>

## Section 4: Bakery (Bake Off)

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
- **When you write the tickets for the shelf, consider including any major allergen in the name of each item.**
  - For example, “Chocolate croissant with hazelnuts”.
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, show them the importance of using dedicated trays for example, keeping almond croissants away from plain croissants.

Food for thought	Notes
<p><b>PASTRY</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, the pastry will probably contain butter (<b>milk</b>) and <b>wheat</b> flour (<b>gluten</b>). It could also contain <b>soya</b> flour.</li> </ul>
<p><b>CROISSANT FILLING</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, does it contain praline (i.e. <b>hazelnuts</b>) or <b>almonds</b>?</li> </ul>
<p><b>CAKES</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, marzipan contains <b>almonds</b>.</li> <li>● Fresh cream (<b>milk</b>).</li> </ul>
<p><b>GLAZE</b> What does it consist of?</p>	<ul style="list-style-type: none"> <li>● For example, is it <b>egg</b> or <b>milk</b>?</li> </ul>

## Section 5: Deli Counter or Shop

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the ticket, consider including any major allergen in the name of each dish**
  - For example, "Chicken satay stick with **peanut** and **sesame** sauce".
- **When serving food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, when serving staff are packaging the items to be purchased use a separate spoon for foods containing an allergen to prevent cross-contamination.

Food for thought	Notes
<p><b>SATAY STICKS</b></p> <p>Was a marinade used? Do you know the ingredients? Do you know the ingredients used in the peanut sauce?  Is the chicken satay stick sprinkled with sesame seeds?</p>	<ul style="list-style-type: none"> <li>● For example, <b>milk</b>, <b>soy</b> sauce or <b>mustard</b> or <b>gluten</b></li> <li>● For example, is <b>peanut</b> the only <b>nut</b> used? Does it contain <b>sesame oil</b>, <b>soy</b> sauce, <b>wheat</b> flour (<b>gluten</b>) or <b>milk</b>?</li> </ul>
<p><b>MEAT</b></p> <p>Are there any extra ingredients?</p>	<ul style="list-style-type: none"> <li>● For example, <b>breaded</b> ham contains <b>wheat</b> flour and <b>gluten</b>.</li> <li>● Ham can be glazed with <b>mustard</b>.</li> <li>● Meat can be stuffed with <b>nuts</b>.</li> <li>● Scotch <b>eggs</b> are covered in <b>breadcrumbs</b> (<b>wheat/gluten</b>)?</li> </ul>
<p><b>CHEESE</b></p>	<ul style="list-style-type: none"> <li>● Cheese contains <b>milk</b>.</li> <li>● Sometimes it can contain <b>nuts</b> (e.g. <b>walnut</b>).</li> <li>● If a cheese does contain <b>nuts</b>, is there a cross-contamination risk (e.g. the cheese cutter).</li> </ul>

## Section 6: Self Service Salad Bar

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - For each shift, make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for holding ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the ticket, consider including any major allergen in the name of each dish**
  - For example, "Waldorf salad with apple, celery and containing walnuts in a mayonnaise dressing".
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent for each salad.
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this. Possibly by putting a notice by the food.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, suggest that they keep salads containing nuts together at one end of the salad bar.

Food for thought	Notes
<p><b>SALAD</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, are <b>celery</b>, <b>nuts</b> or <b>croutons (gluten)</b> used?</li> </ul>
<p><b>MAYONNAISE</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, are <b>egg</b>, <b>milk</b> or <b>mustard</b> or <b>gluten</b> used?</li> </ul>
<p><b>SALAD DRESSING</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● For example, <b>walnut</b> oil, mayonnaise containing <b>egg</b>, <b>mustard</b> powder or <b>soy sauce (gluten)</b>.</li> <li>● Blue cheese dressing which contains cheese (<b>milk</b>).</li> </ul>
<p><b>GARNISH</b> Do you know the ingredients used?</p>	<ul style="list-style-type: none"> <li>● Croutons will contain <b>wheat/gluten</b> and may have been cooked in oil, used to cook other foods or deep-fried.</li> </ul>

## Section 7: Function Catering

By looking after your customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
  - If you are serving a buffet, many of the major allergens are likely to be present.
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - Make sure all staff know who in the team holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the menu for an event, consider including any major allergen in the name of each dish**
  - For example, "Chocolate gateau with hazelnut".
- **Consider having tickets providing information on the allergen content of foods on the buffet table (e.g. "CONTAINS NUTS").**
- **Try to find out which guests have food allergy ahead of the event**
  - For example you could encourage the event organiser to seek this information when sending out invitations? Consider preparing a special meal for the allergic person.
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent for each dish.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example, nut cutlets, scampi or battered/breaded fish).
  - Keep major allergens apart where possible.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, instruct staff to use separate plates of selected foods, prepared in advance for people with a particular allergy. You should ensure that these are clearly labelled and covered to prevent cross-contamination.
  - when waiting staff are serving the food make sure they use a system to ensure the right food goes to the guest who is allergic and that special care is taken if more than one guest present has an allergy.

Food for thought	Notes
<p><b>BUFFET FOOD</b> What ingredients are used?</p> <ul style="list-style-type: none"> <li>● Spring rolls</li> <li>● Sausages</li> <li>● Satay sticks</li> <li>● Prawns in batter</li> </ul>	<ul style="list-style-type: none"> <li>● Are these vegetable spring rolls or <b>seafood</b> spring rolls? Is <b>soy</b> sauce or <b>fish</b> sauce used for flavouring?</li> <li>● Are likely to contain rusk (<b>wheat /gluten</b>) and <b>egg</b>.</li> <li>● Have you made it clear that <b>peanut</b> sauce is part of this dish? (You could provide a ticket saying “<b>CONTAINS PEANUT</b>”).</li> <li>● Are there other ingredients, such as <b>sesame</b>? You could provide a ticket saying “<b>CONTAINS PRAWNS AND GLUTEN</b>”.</li> </ul>
<p><b>FULL MEAL</b> What ingredients are used?</p> <ul style="list-style-type: none"> <li>● Soup</li> <li>● Main course</li> <li>● Desserts</li> </ul>	<ul style="list-style-type: none"> <li>● For example has <b>wheat</b> flour (<b>gluten</b>), <b>cornflour</b> or <b>pearl barley</b> been used as a thickener?</li> <li>● Croutons contain <b>gluten</b>.</li> <li>● Are you clear about the ingredients of any sauces, marinades or gravies?</li> <li>● Does the packaging of any chocolate used have an advisory statement that it may contain <b>nuts</b> or <b>gluten</b>?</li> </ul>
<p><b>DESSERT</b> What ingredients are used?</p>	<ul style="list-style-type: none"> <li>● Have <b>nuts</b> been used as a garnish?</li> </ul>

## Section 8: Institutional Catering e.g. Schools

By looking after your charges well you are enhancing your reputation. To help pupils with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
  - **Milk, egg and peanut** allergy are particularly common among children.
- **Have a system for finding out which children have food allergies**
  - Consider what is the best way to identify the children with allergies for school catering staff.
  - Check with parents of allergic children regularly to ensure your record of their child's allergies is up-to-date.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in as well as foods you prepare from a recipe.
  - Ensure this is kept up-to-date.
- **When you write the menu, consider including any major allergen in the name of each dish**
  - For example, "Lasagne with a cheese sauce (**milk**)".
- **When preparing food for an allergic child, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with detergent.
  - Keep major allergens apart where possible.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example fish fingers or vegetarian sausages).
  - Consider any additional information provided on pre-packed items such as 'may contain' labels.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, when serving food make sure the meals for children with an allergy are kept separate from meals containing the allergenic foods they are avoiding.

Food for thought	Notes
<p>Does the standard recipe contain any ingredients which the child needs to avoid?</p> <p>If it does then there are the following options:</p> <ul style="list-style-type: none"> <li>● keep the allergic child's meal totally separate and leave out the allergen they need to avoid.</li> </ul>	<ul style="list-style-type: none"> <li>● For example use <b>soya</b> milk instead of cow's <b>milk</b> (so long as none of the children are also allergic to <b>soya</b>).</li> </ul>
<p>How do you ensure the child with an allergy gets the meal you have prepared specially for them?</p>	<ul style="list-style-type: none"> <li>● This may involve using coloured coded bowls possibly covered with cling film or a lid.</li> <li>● Ensure the special meal is clearly labelled i.e. <b>nut</b> free chocolate dessert.</li> </ul>
<p>What should you do if you run out of a key ingredient?</p>	<ul style="list-style-type: none"> <li>● Consider keeping a list of equivalent products from the local supermarket and information on whether this contains the allergens.</li> <li>● If using an alternative product you need to make sure that all staff know it is an alternative product, and whether it contains an allergen a child is avoiding.</li> </ul>

## Section 9: Childcare and Child Minders

By looking after your charges well you are enhancing your reputation. To help charges with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
  - Milk, egg and peanut allergy are particularly common among children.
- **Have a system for finding out which children have food allergies**
  - Consider what is the best way to identify the children with allergies for catering staff.
  - Check with parents of allergic children regularly to ensure your record of their child's allergies is up-to-date.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Remember to check the foods you buy in, as well foods you prepare from a recipe for allergenic food ingredients.
  - Ensure this is kept up-to-date.
- **When you prepare menus, consider including any major allergen in the name of each dish**
  - For example "Fish fingers (milk, egg and gluten) and boiled potatoes and peas".
- **When preparing food for an allergic child, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example fish fingers or vegetarian sausages).
  - Keep major allergens apart where possible.
  - Consider any additional information provided on pre-packed items such as 'may contain' labels.
- **Think about the issues of allergen cross-contamination**
  - For example, when staff are serving make sure the meals for children with an allergy are kept separate from meals containing the allergen they are avoiding.

Food for thought	Notes
<p>Does the standard recipe contain any ingredients which the child needs to avoid?</p> <p>If it does then there are the following options:</p> <ul style="list-style-type: none"> <li>● Do not include the allergenic food in the dish for everyone (may not be practical).</li> <li>● Use a substitute for everyone</li> <li>● keep the allergic child's meal totally separate and leave out the allergen they need to avoid.</li> </ul>	<ul style="list-style-type: none"> <li>● For example, use <b>soya</b> milk instead of cow's <b>milk</b> (so long as none of the children are also allergic to <b>soya</b>).</li> </ul>
<p>How do you ensure the child with an allergy gets the meal you have prepared specially for them?</p>	<ul style="list-style-type: none"> <li>● This may involve using coloured coded bowls possibly covered with cling film or a lid.</li> <li>● Ensure the special meal is clearly labelled i.e. <b>milk</b> free breakfast cereal.</li> </ul>
<p>What should you do if you run out of a key ingredient?</p>	<ul style="list-style-type: none"> <li>● Consider keeping a list of equivalent products from the local supermarket and information on whether this contains the allergens.</li> <li>● If using an alternative product you need to make sure the all staff know it is an alternative product and whether it contains an allergen a child is avoiding.</li> </ul>

## Section 10: Different Cuisine Techniques

It is recognised that there are many different cuisine techniques used when cooking foods. It is therefore important that in addition to looking at the composition of foods, you carefully look at the techniques you use to produce them. By looking after you customers well you are enhancing your reputation. To help customers with food allergies, you may want to consider the following points:

### The most important points

- **Know the ingredients of the foods you are serving**
  - Have any of the major allergenic foods been used (see Annex III)?
- **Instruct your staff how to reply to questions**
  - Devise a system for passing on accurate information about ingredients to the allergic customer.
  - Make sure all staff know who holds up-to-date ingredient information.
- **Set up a system for accessing ingredient information**
  - For example, a computer file or paper records in a folder.
  - Don't forget the foods you buy in, as well as foods you prepare from a recipe.
- **When you write the menu, consider including any major allergen in the name of each dish**
  - For example, "Chicken stir fry with **cashew nuts**, peppers and onions".
- **When preparing food for an allergic customer, consider the risk of allergen cross-contamination**
  - Make sure the work preparation surface is clean.
  - Use utensils and equipment that are free of the allergen and have been cleaned with hot water and detergent.
  - If you are cooking in oil, consider what food was previously cooked in the same oil (for example onion bhajis which are coated with **flour**).
  - Be aware that wiping or rinsing woks is unlikely to remove the presence of an allergen and separate cooking pots may be required.
  - In self service areas ensure that when serving foods, different utensils are used for the allergenic foods and the non-allergenic foods.
  - Keep allergenic ingredients in sealed containers.
  - Don't store allergenic ingredients over open packs of other ingredients.
  - If cross-contamination is impossible to eliminate, it is important to make the customer aware of this.
- **Inform your staff about the issues of allergen cross-contamination**
  - For example, when kitchen staff are reheating foods ensuring that the pan has been thoroughly cleaned after using nut oils.

Food for thought	Notes
Do you cook your foods in oil?	<ul style="list-style-type: none"> <li>● For example, <b>sesame</b>, <b>walnut</b>, or <b>peanut</b> oil?</li> </ul>
Has the oil been used to cook other allergenic food?	<ul style="list-style-type: none"> <li>● For example, <b>prawns</b>, could cause a reaction in someone who is allergic to <b>shellfish</b>.</li> <li>● For example, if the oil was used to cook <b>battered/breaded</b> food, the oil would be contaminated with <b>gluten</b>.</li> </ul>
Has the grill, frying pan or wok been thoroughly cleaned with detergent?	<ul style="list-style-type: none"> <li>● This is because very small particles of an allergen can cause a reaction in a sensitive person.</li> </ul>
Do you use peanut oil?	<ul style="list-style-type: none"> <li>● Remember to consider the oil, if a <b>nut</b> allergic customer asks about the ingredients of a food.</li> </ul>
Do you use a common stockpot? What ingredients were used?	<ul style="list-style-type: none"> <li>● For example, <b>flour (gluten)</b> or <b>celery</b>.</li> <li>● For example, has the water previously been used to cook pasta (<b>wheat/gluten</b>)?</li> </ul>
Do you make sauces/gravy? What are the ingredients used?  Has the water used in the sauce been used to cook other foods?	<ul style="list-style-type: none"> <li>● For example, <b>peanut flour</b> or <b>wheat flour</b> used to thicken the sauce.</li> <li>● For example, has the water previously been used to cook pasta (<b>wheat/gluten</b>)?</li> <li>● Do the stock cubes contain <b>wheat/gluten</b>, <b>celery</b> or <b>mustard</b>?</li> </ul>
Do you use toppings or decorate the foods you sell?  What ingredients are used?	<ul style="list-style-type: none"> <li>● For example, cream (<b>milk</b>) could be used in a topping or <b>nuts</b> could be used to decorate a cheesecake.</li> <li>● Croutons served in soup will contain <b>wheat/gluten</b> and may have been cooked in oil or deep-fried.</li> </ul>
Do you use salad dressings? Do you know the ingredients used?	<ul style="list-style-type: none"> <li>● For example, <b>walnut</b> oil, mayonnaise containing <b>egg</b>, <b>mustard</b> powder or <b>soy</b> sauce (<b>gluten</b>) etc.</li> </ul>

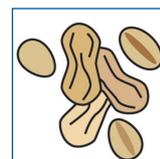
## APPENDIX III: List of allergenic foods

### Allergenic foods that can cause a problem

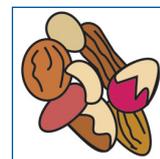
Some of the foods people may be allergic to and some of the products in which they may be found are listed below. This information is reproduced from the booklet, aimed at small businesses, which is associated with this guidance. The booklet, Food allergy: What you need to know, can be downloaded from the Agency website: <http://www.food.gov.uk>. It is also available to order from Food Standards Agency Publications, tel: 0845 606 0667.

The following are some of the foods people may be allergic to and some of the places where they may be found:

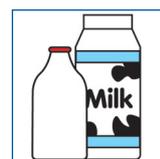
**Peanuts** In sauces, cakes, desserts, groundnut oil, peanut flour.



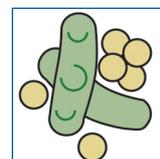
**Nuts** In sauces, desserts, crackers, bread, ice cream, marzipan, ground almonds, nut oils.



**Milk** In yoghurt, cream, cheese, butter, milk powders, foods glazed with milk.

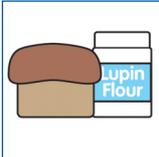
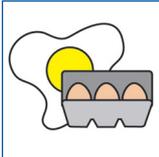
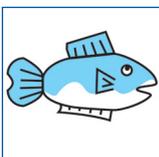
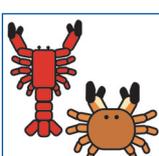
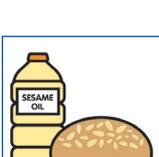
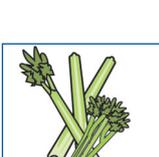


**Soya** As tofu or beancurd, soya flour and textured soya protein, in some ice cream, sauces, desserts, meat products, vegetarian products.



**Mustard** Including liquid mustard, mustard powder and mustard seeds, in salad dressings, marinades, soups, sauces, curries, meat products.



<b>Lupin</b>	lupin seeds and flour in some types of bread and pastries	
<b>Eggs</b>	in cakes, mousses, sauces, pasta, quiche, some meat products, mayonnaise, foods brushed with egg	
<b>Fish</b>	in some salad dressings, pizzas, relishes, fish sauce and some soy and Worcestershire sauces	
<b>Shellfish</b>	such as prawns, mussels, scampi, crab, oyster sauce, shrimp paste	
<b>Gluten</b>	in cereals such as wheat, rye and barley and foods containing flour, such as bread, pasta, cakes, pastry, meat products, sauces, soups, batter, stock cubes, breadcrumbs, foods dusted with flour	
<b>Sesame seeds</b>	in bread, breadsticks, tahini, houmous, sesame oil	
<b>Celery</b>	including celery stalks, leaves and seeds and celeriac, in salads, soups, celery salt, some meat products	
<b>Sulphur dioxide</b>	in meat products, fruit juice drinks, dried fruit and vegetables, wine, beer	

## APPENDIX IV: Contacts for further information about this guidance

The address for all correspondence relating to the issues set out in this advice is:

In England:                      Labelling Standards and Allergy Division  
  Food Standards Agency  
  Aviation House  
  125 Kingsway  
  London  
  WC2B 6NH  
  Tel: 0207 276 8000  
  Fax: 0207 276 8513

In Wales:                         Dietary Health and Consumer Choice  
  Food Standards Agency Wales  
  11th Floor, Southgate House  
  Wood Street  
  Cardiff  
  CF10 1EW  
  Tel: 029 2067 8911  
  Fax: 029 2067 8918/8919  
  E-mail: [wales@foodstandards.gsi.gov.uk](mailto:wales@foodstandards.gsi.gov.uk)

In Scotland:                     Food Standards Agency Scotland  
  St Magnus House  
  6th Floor  
  25 Guild Street  
  Aberdeen  
  AB11 6NJ  
  Tel: 01224 285 165  
  Fax: 01224 285 168

In Northern Ireland:         Food Standards Agency Northern Ireland  
  10 A-C Clarendon Road  
  Belfast  
  BT1 3BG  
  Tel: 028 9041 7714  
  Fax: 028 9041 7726

## APPENDIX V: Other Sources of Information

Information and advice on the legislation and Agency policy is available at the resources below:

More detailed background information on Food Allergy & Intolerance definitions is available at:

<http://www.eatwell.gov.uk/healthissues/foodintolerance/>

Copies of the guidance on allergen management and consumer information is available at:

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/allergyguidance>

A summary document is also available at:

<http://www.food.gov.uk/safereating/allergyintol/>

Agency guidance on nutritional standards in institutional catering available at:

<http://www.food.gov.uk/news/newsarchive/2007/oct/publicinstguide>

### Hygiene guidance for caterers

Food Standards Agency – Safer Food Better Business

<http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/sfbb>

Food Standards Agency Scotland

CookSafe – Food Safety Assurance System

<http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/cookretailsotland/>

Food Standards Agency Northern Ireland

Safe Catering – Your Guide to HACCP

<http://www.food.gov.uk/northernireland/safetyhygieneni/safecateringni/>

Guidance notes on The General Food Law

<http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/generalfoodlaw>

**For general information on allergy and intolerance:**

Anaphylaxis Campaign  
PO Box 275  
Farnborough  
Hampshire  
GU14 6SX  
Tel: 01252 542029  
<http://www.anaphylaxis.org.uk>  
<http://www.cateringforallergy.org>

Coeliac UK  
Suites A-D  
Octagon Court  
High Wycombe  
Bucks  
HP11 2HS  
Tel: 01494 437278  
Fax: 01494 474349  
Helpline: 0870 444 8804  
<http://www.coeliac.org.uk>

Allergy UK  
3 White Oak Square  
London Road  
Swanley  
Kent  
BR8 7AG  
Tel: 01322 619898  
Fax: 01322 663480  
<http://www.allergyuk.org/>

**For technical support in the area, the following resources may be of interest:**

**Enforcement Resources**

LACoRS  
Local Government House  
Smith Square  
London  
SW1P 3HZ  
Tel: 020 7665 3888  
Fax: 020 7665 3887  
<http://www.lacors.gov.uk>

Chartered Institute of Environmental Health  
Chadwick Court  
15 Hatfields  
London  
SE1 8DJ  
Tel: 020 7928 6006  
Fax: 020 7827 5862  
<http://www.cieh.org>

CIEH Wales  
Pembroke House  
Tŷ Coch Lane  
Llantarnum Park Way  
Cwmbrân  
Wales  
NP44 3AU  
Tel: 01633 865533  
Fax: 01633 485193

CIEH Northern Ireland  
123 York Street  
Belfast  
Northern Ireland  
BT15 1AB  
Tel: 028 9024 3884  
Fax: 028 9023 3328

### **Technical Resources**

Reading Scientific Services Ltd  
The Lord Zuckerman Research Centre  
Whiteknights Campus  
Pepper Lane  
Reading  
RG6 6LA  
Tel: 0118 986 8541  
Fax: 0118 986 8982  
<http://www.rssl.com>

Leatherhead Food International  
Randalls Road  
Leatherhead  
Surrey  
KT22 7RY  
Tel: 01372 376761  
Fax: 01372 386228  
<http://www.leatherheadfood.com>

Campden & Chorleywood Food Research Association  
Chipping Campden  
Gloucestershire  
GL55 6LD  
Tel: 01386 842000  
Fax: 01386 842100  
<http://www.campden.co.uk>

Allergy Training  
Hygiene Audit Systems  
23a Albion Road  
St Albans  
AL1 5EB  
Tel: 01727 866779  
<http://www.allergytraining.com>



