



Assured Advice

16th January 2019

DEALING WITH ALLERGENS

This guidance is designed to help improve the way foodservice businesses raise awareness of potential allergens in foods they make and sell. It is intended as the minimum standard which the industry should follow in order to ensure that customers with food allergies are made aware of the risks in relation to certain foods. Businesses are encouraged to expand on these guidelines, where it is feasible to do so.

The guidance has been developed by the British Sandwich and Food to Go Association as good practice and has been shared with officials at the Food Standards Agency and the Department of Food, Environment and Rural Affairs.

It is recommended that food businesses should follow these guidelines in advance of a wider Government labelling consultation scheduled for 2019.

Who this applies to

This guidance is for businesses that make sandwiches and food to go products either on their own premises or in central preparation units but sold via their own outlets by their own employees. Such products may be made to order in front of the customer, sold from a display cabinet unwrapped, or sold packaged from grab-and-go cabinets.

Products are not generally required to be individually labelled but must be displayed with the name of the item and a description.

The guidelines do not apply to packaged products which are made centrally and sold through retail premises operated by third party retailers or caterers. Such products are required by law to carry full ingredient labelling.

It is generally accepted by food business operators that such foodservice operators cannot reasonably be expected to provide full labelling due to the way such businesses operate and the risks of misleading consumers if information is incorrect.

How to Identify Allergens

There are 14 food allergens prescribed under the Food Information Regulations (see appendix list). All ingredients should by law state any food allergens they contain – these are generally printed in bold on the ingredient list.

If this information is not readily available on packs, businesses should ask their supplier to provide this information.

It is important that where substitute products are purchased, these are checked to ensure that the formulations do not differ from those generally used and, if necessary, consumer advice should be amended, and staff equipped with that knowledge

The Guidance

All foodservice (catering) businesses are strongly recommended to adopt the following allergen awareness guidelines as a minimum:

Products packed for direct sale: Where products are wrapped/pre-packed for customers to grab-and-go, packaging should carry a statement along the lines of: “Allergens: Some of our products contain allergens – please ask our staff for details”

This statement should be printed prominently on packs (or pack labels) within the normal field of vision and, ideally, printed as part of the pack.

Labelling in this way helps to ensure that the message reaches all consumers, including those purchasing remotely or via another person.

Made to Order: Where products are made to order or served ready-made (unpacked) from a counter, prominent signage should be used both on menu boards and on the counters stating: “Allergens: Please ask our staff for details”

On-Line Ordering: Where products are ordered on-line, customers should be asked if they (or anyone they are ordering for) have food allergies or intolerances at the start of the ordering process. If they do, they should be referred to either allergen information on-line or provided with a contact number to call for information.

Menus: In establishments where written menus are used, either on boards or in printed format, the same allergen question should be prominently displayed in a way that cannot be overlooked by customers.

Reliance on Staff: Employees should not provide customers with information about allergens verbally but should be provided written information that can be passed to the customer so that they can make their own decisions. Such information should, at a minimum, include the name and description of the product plus a detailed list of allergens the product contains. This information should be provided in such a way that it can easily be immediately updated should ingredients or recipes change.

Cross-contamination: In situations where food preparation areas are so restricted that it is impossible for the business to guarantee that traces of allergens may not transfer from one product to another, it may be necessary to state that the business uses ingredients containing allergens and provide the customer with a list of the allergens used by the business. However, it is not the intention of this guidance to discriminate against allergen sufferers in this way unless it is absolutely unavoidable, and businesses should be able to demonstrate this via a risk assessment.

Deliveries: Where products are sold remotely (on-line or by phone) and delivered to customers, packaging should always contain the same allergen question and refer customers either to a website or telephone number where they can get the appropriate information. Delivery drivers should not be relied upon to provide such information verbally unless they are direct employees of the business and equipped with appropriate written information to show to the customer. Ideally, delivery drivers should be instructed to direct customers to a telephone number or website printed on the delivery box or pack.

Further advice can be obtained from the British Sandwich and Food to Go Association by emailing membership@sandwich.org.uk

Food Allergens Schedule

1. Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridised strains); except for
 - (a) wheat-based glucose syrups including dextrose#
 - (b) wheat-based maltodextrins#
 - (c) glucose syrups based on barley
 - (d) cereals used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages.
2. Crustaceans and products thereof (e.g. prawns, crabs, lobster, crayfish etc.)
3. Eggs and products thereof
4. Fish; except for
 - (a) fish gelatine used as a carrier for vitamin or carotenoid preparations
 - (b) fish gelatine or isinglass used as a fining agent in beer and wine
5. Peanuts and products thereof
6. Soybeans and products thereof, except for:
 - (a) fully refined soya bean oil and fat#
 - (b) natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, natural D-alpha tocopherol succinate from soya bean sources
 - (c) vegetable oils derived from phytosterol esters from soya bean sources
 - (d) plant sterol ester produced from vegetable oil sterols from soya bean sources.

7. Milk and products thereof (including lactose); except for

(a) whey used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages

(b) lactitol

8. Nuts, namely almonds (*Amygdalus communis* L.), hazelnuts (*Corylus avellana*), walnuts (*Juglans regia*), cashews (*Anacardium occidentale*), pecan nuts (*Carya illinoensis* (Wangenh) K.Koch), brazil nuts (*Bertholletia excelsa*), pistachio nuts (*Pistacia vera*), macadamia or Queensland nuts (*Macadamia ternifolia*)

9. Celery and products thereof (includes celeriac, celery spice, celery seeds etc.)

10. Mustard and products thereof

11. Sesame seeds and products thereof

12. Sulphur dioxide and sulphites (at concentrations of more than 10 mg/kg or 10mg/litre expressed as SO²)

13. Lupin and products thereof

14. Molluscs and products thereof (includes mussels, oysters, whelks, scallops etc.)

The exception only applies to products derived from these products in so far as the process they have undergone is not likely to increase the level of allergenicity assessed by the European Food Safety Authority for the relevant product from which they originated.

If you are a member and you follow this advice you are protected from being challenged by enforcement authorities. If you have any problems regarding this, please immediately contact the Association and we will take any issues up on your behalf. To contact the Association email jim@sandwich.org.uk or call Sandra on 01291 636348