

# Introduction - SME allergen provision in the non-prepacked sector

Food hypersensitivity (FHS) is a strategic priority for the Food Standards Agency (FSA). In the UK, an estimated two million people are living with a diagnosed food allergy, and 600,000 with Coeliac Disease. It is a significant public health issue that impacts on the quality of life and mental health of those affected.

The FSA aims to ensure that FHS is managed by food businesses, to ensure that the needs of consumers are met and to reduce the risk of harm to consumers with food hypersensitivities. As part of a wide range of work in this area, the FSA is considering potential options to help people with food hypersensitivities make safe, informed decisions when purchasing non-prepacked food such as unwrapped foods or meals.

Currently, businesses selling non-prepacked foods are required to provide information about any of the 14 mandatory allergens set out in Retained EU Legislation (1169/2011) which are present in the food. Allergen information for non-prepacked food can be communicated through a variety of means, such as on a menu, chalkboard or information pack. Where caterers choose not to provide this information upfront in a written format (for example allergen information on the menu), the food business must provide clear written signposting to direct the customer to where this information can be found, such as asking members of staff.

In 2022, the FSA commissioned Britain Thinks to explore [allergen provision in the out of home food sector](#), with a focus on non-prepacked foods. The work identified that while consumers prefer written information, so they can make decisions on their own and have a normal eating out experience, FBOs prefer conversations so that they can understand individual needs and avoid cross-contact when food is being prepared. Responding to various options for standardising how FBOs communicate allergen information to customers, the research also found that a sizable minority of food businesses felt the measures proposed would be unfeasible to adopt with smaller businesses more likely to say this. These measures included:

1. Displaying each of the 14 allergens in dishes on the main menu (32% said would be unfeasible)
2. Food servers being legally required to ask customers about allergies (27% said would be unfeasible)
3. Full ingredients list for each dish to be provided in an allergen matrix (21% said would be unfeasible)

However, as an artefact of sampling, certain FBOs were less well represented in the survey research (including micro business, cafes, takeaways, and mobile food businesses). These businesses are likely to have a range of service models, and this could have an impact on the feasibility of changing the requirements for how allergen information is provided to consumers. For example, cafes or mobile food operators may offer counter service without a menu (rather than table service provided by waiting staff).

The focus of this research was to understand in more detail how micro and small businesses (hereafter SMEs) in the non-prepacked sector provide allergen information to consumers, and the impact of some of the potential options for changes to the provision of allergen information requirements for SMEs across a variety of service models. As part of this process, the FSA were also interested in gathering the views of specialist trade associations.

The core method involved online interviews with 30 owners of SME FBOs across England, Wales and Northern Ireland. Questions were tailored for FBOs operating under different service models, and employing different communication practices for providing customers with allergen information. These interviews also examined business' perspectives on various options which could be considered by the FSA for standardising the communication of allergen information to customers. The topic guide used in the research can be found in the appendices.

To enrich and contextualise the findings of the interviews, the research also involved:

- Short (2-3 hour) ethnographic deep dives with 10 additional FBOs, to bring to life the allergen management and communication behaviours of different food businesses. The deep dives used participant observation to explore how customers are served. During the deep dives, researchers also recorded the physical layout and culture of the business by taking photographs, and made notes suggesting these environmental factors may influence behaviour. These FBOs were also interviewed on site, following the same topic guide as the online depth interviews.
- online interviews with representatives of 6 trade bodies working with small- and micro-food businesses, to gain a sector wide perspective on the risk management and communication behaviours of FBOs working in the non-prepacked sector. Additionally, trade bodies' views on options for standardising allergen risk communication practices were explored.

The research used the COM-B behavioural model to systematically classify influences on how businesses provide allergen information to customers. It also used the COM-B behavioural model to identify the barriers and enablers for businesses to manage cross-contact risks and to provide accurate allergen information to customers. COM-B identifies three factors that need to be present for any behaviour to occur: capability, opportunity and motivation. [\(footnote 1\)](#) In the context of this research, it includes factors such as knowledge about legal duties, the physical space to display allergen information, beliefs about allergen risks, habits around communication, and what is considered normal in the sector.

Finally, the APEASE framework was applied to analyse interviewees' perspectives on the proposed options. [\(footnote 2\)](#) This framework specifies a set of criteria to apply when making judgements about possible interventions to change behaviour. The criteria are Acceptability, Practicability, Effectiveness, Affordability, Side-effects, and Equity.

This report presents the results of this analysis, together with a discussion of the implications of the findings for the FSA. The next section provides an overview of the research objectives, methods and sample.

1. Public Health England 2020. 'Achieving behaviour change: A guide for national government'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/93332](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/93332)
2. Ibid.