

Considerations - SME allergen provision in the non-prepacked sector

The research sought to understand how SMEs serving non-prepacked food currently provide allergen information to customers (including any written or digital materials) and the reasons for this approach. The findings of this aspect of the study suggest several considerations for policymakers considering how allergy information can be provided by FBOs. These include:

1. SMEs currently communicate allergen information in different ways.

2. SMEs justify their approaches to providing allergen information using an array of possibly misplaced, and sometimes contrasting, beliefs. Ensuring that businesses beliefs related to allergen information provision are evidence-based may help ensure that businesses do not practice behaviours based on inaccurate assumptions.

3. SMEs choice and expression of allergen information provision behaviours is shaped by factors outside of their immediate control or which are intrinsic to their business. For example, the research found evidence that service model, business size, service environment and the types of food served by a business can all shape how allergen information is communicated. This suggests that it is unlikely a one-size-fits-all approach to allergen information provision is possible, as it ignores the inherent diversity of food businesses in the sector.

The research also set out to identify challenges that SMEs face providing accurate allergen information to customers, as well as challenges around managing allergen cross-contact. The findings suggest that taking a systems thinking approach may be useful when considering how FBOs can manage cross-contact risks and communicate allergen information. The following points are around the system that food businesses operate in and should be taken into consideration:

4. Recent shocks may have made it difficult for SMEs to manage cross-contact risks and provide accurate allergen information to customers. These shocks may have impacted the capabilities of businesses to perform these functions by contributing experienced, tenured professionals leaving the food service industry, and by deepening supply chain insecurities. Efforts to support the sector need to be sensitive to the continuing influence of global and domestic events on the behaviours of SMEs.

5. There is a perception that the use of agency staff is increasing within the sector. This raised concerns among one trade body representative that these staff may be less capable of managing cross-contact risks and providing accurate allergen information. This is due to concerns about the extent to which these staff may be trained and motivated to ensure the safety of FHS customers.

6. There are concerns about the degree of standardisation in the education provided to and by businesses to ensure their staff can manage cross-contact risks and provide accurate allergen information. Gaining more clarity on what education is provided, by and to whom, could provide an important step towards understanding whether more standardisation is

required.

7. Kitchen and service area space is an unavoidable factor defining what is feasible for SMEs to do when managing cross-contact risks. Policies in this area need to remain cognisant of this fact, to avoid requiring businesses to follow guidance that is inherently impractical for them to put into practice.

8. Suppliers play a fundamental role in enabling SMEs to manage cross-contact risks and provide accurate allergen information to customers. Engaging the wider supply chain may therefore help find ways to make it easier for SMEs to perform these roles effectively.

9. Technological solutions may reduce barriers to SMEs providing accurate allergen information. Investing in new innovations and finding ways to increase SMEs awareness of and access to such solutions may help improve the provision of allergen information for the sector as a whole.

Finally, this research examined the challenges and benefits of a range of different options for providing allergen information to consumers. Feedback from businesses and trade body representatives support the following considerations for policymakers:

10. There is currently no clear winner in terms of the options provided. No option drew unanimous support from all businesses and trade bodies, and all received at least some negative feedback in terms of their acceptability, practicality, effectiveness, affordability, potential for unintended consequences, and equity.

11. There was somewhat stronger consensus around the unacceptability of including a full, written list of ingredients on menus. This option was negatively received by most businesses except those serving a small number of dishes with limited ingredients. It was generally considered impractical, as well as potentially ineffective by some. It may also disadvantage certain types of businesses, such as SMEs who are protective of their recipes.