

Appendix D - Understanding international provision of allergen information

The three topic guides used within the fieldwork of this project for interviews. This includes Food businesses, Academics and consumers, and Enforcement officers and Policy makers

Food businesses

RSM UK Consulting LLP (RSM) has been commissioned by the Food Standards Agency (FSA)(UK) to understand the views of stakeholders of the international provision of allergen information picture in the non-prepacked sector.

This evaluation involves a rapid evidence assessment to develop an understanding of the international provision of allergen information picture in the non-prepacked sector. As you may know, the non-prepacked food sector includes cafes, restaurants, food trucks, takeaways, and also food that is sold loose in supermarkets and grocery stores. The outcomes of the evaluation have the potential to inform future policy and regulation decisions as well as guide the development of further research.

My name is [Name of interviewer], and I am a researcher from the RSM research team. Thank you for agreeing to participate in this interview.

Our primary purpose for the interview today is to gather different perspectives on a variety of legislation approaches and practices in terms of providing allergen information to customers/consumers and to understand what works from your perspective, what needs to be improved and why.

This discussion should take about 30-45 minutes but may be a little shorter or longer depending on your responses. Participation is completely voluntary, and you can choose not to answer a question or to stop the discussion at any time. The findings from this discussion will be used to ensure the robustness of our search protocol. We would like to audio record our discussion today for the purposes of note-taking. These recordings and notes will only be used for discussion for internal purposes and will not be provided to anyone outside the research team. Are you happy for us to start recording?

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Current role, organisation and country

1. Please can you describe your current role, organisation that you work for and the country you are based in?

Approaches of providing food allergen information (ask all stakeholders)

2. Which approaches of providing food allergen information do you have experience with, within your country or region?

Prompt: Written notice, verbal notification of allergens

3. Have these changed over time, and if so how, are you aware of any factors that led to the change?

4. Are you aware of any evidence (for example for research or evaluations) that relates to the legislation/ guidance? If yes, can you share what is the underlying evidence?

What works well/not-so well & Enablers/barriers

5. Out of the approaches you have mentioned that are currently used in your country, which approaches work well from your perspective and could you elaborate on why this is the case?

6. Similarly, which approach do not work so well from your perspective, and could you elaborate on your reasons?

7. Are there any factors beyond the legislation/ guidance that enable, or become a barrier, to the success of these approaches?

8. Are there any other steps that could be taken, either in terms of doing things differently and in addition to the current legislation or guidance, that could support consumers with food hypersensitivities/allergies?

Compliance

9. Can you explain the processes around compliance?

a. What do you as a business have to do to demonstrate compliance with the legislation?

b. Is this process effective? What are its strengths and weaknesses?

10. In your opinion, is it difficult to achieve compliance with the legislation?

a. If yes, what are the barriers you face?

b. If no, what are the factors that support compliance for you?

11. Are there any consequences you have to face as a business if you do not comply with the legislation?

a. If yes, what are the consequences?

12. Do you think these consequences are sufficient to ensure compliance?

13. Are there other factors that you think could improve compliance rates?

14. What have been your main lessons learnt in terms of ensuring compliance?

Good practice

15. Are there any examples of good practice in terms of providing allergen information in non-prepacked foods that you are aware of? This could be examples from within your country or internationally.

c. If yes, what do you like about the approach? And why do you think it is effective?

16. Do you have any recommendations for what FSA in the UK should do to improve the legislation and compliance, and as a result improve consumer safety?

Evidence gaps (priority for countries with little/no relevant literature)

17. We have not been able to find much evidence in the English language on the current legislation or enforcement, or indeed published literature on what works well or not in your country
- Do you think there is a gap in evidence related to food allergy in the non-prepacked sector?
 - If yes, what do you think that might be the case?
 - If no, where might we be able to access the evidence, in terms of government websites or academic articles etc.?

Unintended consequences

18. Have there been any unintended consequences of the legislation or guidance in your country on how to provide information for allergens in non-prepacked foods?

Any other comments

19. Do you have any other comments or feedback on the legislation or guidance in your country or good practice approaches that you are aware of to provide information about allergens in the non-prepacked food sector?

Thanks and close

Academics and consumers/patient advocacy groups

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4. Are you aware of any evidence (for example for research or evaluations) related to the legislation or guidance? If yes, can you share what is the underlying evidence?

Prompt: Only applies to certain food products i.e. Meat, Only applies to certain Food businesses i.e. Restaurants and not street food vendors

What works well/not-so well & Enablers/barriers

5. Out of the approaches you have mentioned that are currently used in your country, which approaches work well from your perspective and could you elaborate on why this is the case?

6. Similarly, which approach do not work so well from your perspective, and could you elaborate on your reasons?

7. Are there any factors beyond the legislation guidance that enable, or become a barrier, to the success of these approaches?

Good practice

8. Are there any examples of good practice in terms of providing allergen information in non-prepacked foods that you are aware of? This could be examples from within your country or internationally.

a. If yes, what do you like about the approach? And why do you think it is effective?

9. From your perspective, what works well in terms of how allergen information is provided?

- a. Orally
- b. Written

10. Do you have any recommendations for what FSA in the UK should do to improve the legislation and compliance, and as a result improve consumer safety?

Evidence gaps (priority for countries with little/no relevant literature)

11. We have not been able to find much evidence on the current legislation or enforcement, or indeed published literature on what works well or not in your country?

a. Do you think there is a gap in evidence related to food allergy in the non-prepacked sector?

b. If yes, what do you think that might be the case?

c. If no, where might we be able to access the evidence, in terms of government websites or academic articles etc.?

Unintended consequences

12. Have there been any unintended consequences of the legislation or guidance in your country on how to provide information for allergens in non-prepacked foods?

Data on deaths/incidents

13. Are you aware of any central monitoring of food allergy-related deaths or incidents in your country or other countries? If yes, where might we be able to find the data?

Any other comments

14. Do you have any other comments or feedback on the legislation in your country or good practice approaches that you are aware of to provide information about allergens in the non-prepacked food sector?

Thanks and close

Policy makers and enforcement officers

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4. Are you aware of any evidence (for example for research or evaluations) that relate to the legislation or guidance? If yes, can you share what is the underlying evidence?

Enforcement process and capacity

5. Can you share how the legislation related to these information provision approaches is enforced in your country?
 - a. What is the enforcement process?
Prompt: does it vary for written and oral information provision? And how?
 - b. How do you validate/verify the accuracy of the information provided by businesses? And how frequently do these checks take place?
 - c. Who is involved (for example enforcement officers, supervisors, auditors) and what powers do they have?
 - d. How many enforcement officers are involved per number of businesses? (even approximate estimates if not actual values would be useful)
 - e. What kind of training and qualifications are required?
 - f. How effective is the process? Are there areas for improvement?

Compliance

6. What are the sanctions, fines, penalties or other consequences for businesses that do not comply with the legislation?
 - g. Follow up: Do you think these are sufficient to prompt compliance? Why? /why not?
7. Does your country monitor compliance rates?
 - h. If yes, are these data available and if so, where might we be able to find them?
 - i. If not, why not?
8. Are there specific types of non-prepacked food businesses that have the greatest frequency of incidents in your opinion? Why might this be the case?
Prompt: Sizes of FBO's (small, medium or large)

What works well/not so well & Enablers/barriers

9. What challenges have you/others faced, if any, when introducing or enforcing relevant legislation? Were you able to overcome these challenges and, if so, how?
10. Are there any factors that act as enablers in terms of enforcement?
11. What have been your main lessons learnt in trying to create or enforce legislation?

Good practice

12. Are there any examples of good practice in terms of providing allergen information in non-prepacked foods that you are aware of? This could be examples from within your country or internationally.
 - a. If yes, what do you like about the approach? And why do you think it is effective?

13. At present the UK, follows EU regulations on the provision of non-prepacked allergen advice, do you have any recommendations for what FSA in the UK should do to improve the legislation and compliance, and as a result improve consumer safety?

Prompt: For example, food sold loose, food packed for direct sale or supply to the final consumer, or mass catered food.

Evidence gaps (priority for countries with little/no relevant literature)

14. We have not been able to find much evidence in English on the current legislation or enforcement, or indeed published literature on what works well or not in your country?

a. Do you think there is a gap in evidence related to food allergy in the non-prepacked sector?

b. If yes, what do you think that might be the case?

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Thanks and close