

# Allergen labelling for food manufacturers

How to label allergens and avoid allergen-cross contamination when producing pre-packed food. If you produce pre-packed food, you need to follow allergen labelling requirements set out in <u>Food</u> Information for Consumers Regulation (FIC).

Pre-packed food is any food put into packaging before being placed on sale. Food is pre-packed when it:

- is either fully or partly enclosed by the packaging
- cannot be altered without opening or changing the packaging
- is ready for sale

# 14 allergens

If your product contains any of the main 14 allergens as an ingredient or processing aid, it must be included on the label.

The 14 main allergens are:

- celery
- cereals containing gluten including wheat (such as spelt and Khorasan), rye, barley and oats
- crustaceans such as prawns, crabs and lobsters
- eggs
- fish
- lupin
- milk
- molluscs such as mussels and oysters
- mustard
- tree nuts including almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts
- peanuts
- sesame seeds
- soybeans
- sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million)

# Allergen labelling

Pre-packed food must have an ingredients list. Allergenic ingredients must be emphasised in some way every time they appear in the ingredients list. For example, you can list them in bold, contrasting colours or by underlining them.

## An example of how to list allergens on your product

Ingredients: Water, Carrots, Onions, Red Lentils (4.5%) Potatoes, Cauliflower, Leeks, Peas, Cornflour, **Wheat** flour, Salt, **Cream**, Yeast Extract, Concentrated Tomato Paste, Garlic, Whey (**Milk**), Sugar, **Celery** Seed, Sunflower Oil, Herbs and Spice, White Pepper, Parsley

Allergenic ingredients must be declared with a clear reference to the allergen to ensure clear and uniform understanding.

Examples of ingredients that need to be clearly referenced to the allergen are:

- tofu (soya)
- tahini paste (sesame)
- whey (milk)

Allergen advice statements can also be used on the product label to explain how allergen information is presented on a label, for example:

- 'Allergen Advice: for allergens, see ingredients in bold'
- 'Allergen Advice: for allergens including cereals that contain gluten see ingredients in red'

For alcoholic drinks with no ingredients list, allergens must be indicated by the word 'contains' followed by the name of the allergen.

**Tip:** Use our <u>allergen and ingredients food labelling tool</u> to find out more about the different requirements for food labelling and what your business needs to do.

## Precautionary allergen labelling

If there is a risk of a food product being affected by allergen cross-contamination, the label should include one of the following statements:

- may contain X
- not suitable for someone with X allergy

Precautionary allergen labelling should only be used after a thorough risk assessment. It should only be used if the risk of allergen cross-contamination is real and cannot be removed.

#### Free-from labelled foods

Free from food are special ranges of foods made without allergens. If a label states that your product is 'free-from milk' or, 'peanut free', it has to be based on specific and rigorous controls. These controls need to ensure that the final product is completely free of the particular allergen. This includes checking that all ingredients and packing materials do not contain this allergen and that cross-contamination from other foods made on site is prevented.

There is one exception to this rule which is gluten. Gluten-free labelled products can contain a maximum 20mg/kg of gluten.

#### Language on the label

The language on the labelling should be easily understood by the people of the country where the food is marketed. For food products sold in the UK, the information must be in English.

## Multi-packs

Where products are sold in multi-packs, allergens must be displayed on the outer packaging.

If you provide allergen information on the packaging of individual products, then it has to be consistent with the outer packaging.

You can find a detailed explanation of the requirements for pre-packed and non-prepacked foods in our technical guidance.

**Important** 

## References to EU legislation in FSA guidance

Directly applicable EU legislation no longer applies in GB. EU legislation retained when the UK exited the EU became assimilated law on 1 January 2024, published on <a href="legislation.gov.uk">legislation.gov.uk</a>. References to any legislation in FSA guidance with 'EU' or 'EC' in the title (e.g. Regulation (EC) 178/2002) should now be regarded as assimilated law where applicable to GB. References to 'Retained EU Law' or 'REUL' should now be regarded as references to assimilated law.

For businesses moving goods from Great Britain to Northern Ireland, information on the Windsor Framework is available on GOV.UK.

The Windsor Framework was adopted by the UK and EU on 24 March 2023. The Framework provides a unique set of arrangements to support the flow of agrifood retail products from Great Britain (GB) to Northern Ireland (NI), allowing GB standards for public health in relation to food, marketing and organics to apply for pre-packed retail goods moved via the NI Retail Movement Scheme (NIRMS).

# **Avoiding allergen cross-contamination**

Cross-contamination happens when traces of allergens get into products accidently during the manufacturing, handling, transport or storage of foods. The risk of cross-contamination can be avoided or reduced with careful management.

#### Staff awareness

All staff involved in handling ingredients, equipment, utensils, packaging and final food products should be aware of the possibilities of cross-contamination with allergens. They should aim to minimise the possibilities of allergen cross-contamination.

#### Design

Ideally, you would have separate production facilities for specific products. If not, try scheduling the foods you are producing by preparing foods in order of least allergenic to most allergenic to manage cross-contamination.

#### **Storage**

Raw ingredients containing food allergens should be stored away from other ingredients. Keep them in sealed plastic bins that are clearly marked or colour-coded.

#### Cleaning

Very small amounts of some allergens can cause severe allergic reactions in sensitive people. It is so important to clean thoroughly in a way that reduces the risk of cross-contamination.

Some methods of cleaning may not be adequate for removing some allergens. Dismantling equipment and cleaning each individual part with water (if appropriate) by hand is a good way to make sure that 'hard-to-clean' areas are free from allergen contamination. Develop and follow suitable cleaning regimes.

## **Packaging**

Allergy related product withdrawals or recalls are often caused by incorrect packaging or labelling. Ensure that the correct labels are applied to products and any outer packaging.

Packaging should be removed and destroyed at the end of a production run. This includes any that may be within the wrapping machine.

## Developing new products or changing existing products

If the newly developed or changed product contains one or more of the 14 allergens, it could lead to cross-contamination of other products produced in the same premises. In this case, you will need to assess the risk and decide whether precautionary allergen labelling is appropriate for both the new and existing products.

When recipes are updated and allergenic ingredients change, we recommend labelling the changed products with a new recipe sticker to highlight to customers the change.