

# FSA 22-06-07 Food Hypersensitivity (FHS) – Update on Workstreams and Recommended Next Steps: main report

This paper updates the Board on the work carried out as part of the Food Hypersensitivity (FHS) Programme and the proposed approach for the next phase.

Report by Rebecca Sudworth, Director of Policy

## 1. Summary

1.1 This paper updates the Board on the work carried out as part of the Food Hypersensitivity (FHS) Programme and the proposed approach for the next phase.

1.2 The Board is asked to:

**Consider** the progress of FHS work to date and note plans for the transition to phase two

**Endorse** our proposed focus on three priorities for phase two:

a) improving Precautionary Allergen Labelling (PAL) through a more standardised approach, more support for food businesses to apply PAL when necessary and improving allergen cross-contact risk management.

b) a new workstream to improve allergen management and information to consumers in the 'non-prepacked' sector – i.e., food prepared on request in businesses such as restaurants and takeaways.

c) continued focus on improving our understanding of the causes and impacts of FHS reactions.

**Note** the options considered but not identified to take forward as priorities at this time, how we propose to meet the objectives for the workstreams in alternative ways and any further work required:

a) A food allergy safety rating scheme for food businesses, similar to the FHRS scheme.

b) Changes to the current legislative requirements on allergen information for non-prepacked food (but see recommendation on civil sanctions at 4.30).

c) A central reporting tool for consumers to report 'near miss' reactions directly to the FSA.

## 2. Introduction

2.1 The FHS Programme was established in autumn 2019 to deliver the objectives of the FHS Strategy, which aims to improve the quality of life for people with FHS. At the heart of our

approach is working with businesses and consumers to bring about a culture change in how allergies and intolerances are managed. Both businesses and consumers have a responsibility to understand and manage risk, supported by the legislative framework, the best science and evidence and the right guidance and support.

2.2 In phase one of the Programme, we prioritised work on the implementation of the new labelling requirements for [prepacked for direct sale \(PPDS\)](#) food which were introduced from 1 October 2021 across the UK. We also tested a central reporting tool for consumers to report 'near miss' reactions, investigated options for a food allergy safety rating scheme for businesses, and conducted research and scoping work on two further potential workstreams – improving PAL and improving allergen management and information for people with FHS in the non-prepacked sector.

2.3 In June 2021 we updated the Board on progress. We have completed work to implement the new labelling requirements for PPDS food. A formal evaluation of PPDS implementation will take place from October 2022 and we will update the Board in 2023 on the findings and any lessons learned that could inform future allergen labelling policy. The results of early survey work with food businesses and local authorities are outlined at Annex A, together with a brief report on other workstreams not discussed in detail in this paper.

2.4 In 2021 we established an expert panel to support our engagement with external organisations involved in work on FHS, and to provide feedback and comment on the FSA's approach to the FHS Programme. The panel has met four times and we are grateful for the input we have received, which has informed our approach. Membership of the panel is outlined at Annex B.

2.5 Since 2010, the FSA has played a leading role in understanding the causes and impact of food hypersensitivity, and the mechanisms through which risk may be avoided or managed. Working with partners in the health services, academia and in government we will continue to explore how we can improve our understanding, targeting our efforts on building an evidence base that will inform future policy. The annexes to this paper summarise the research and scoping work that has informed our recommendations about the approach for phase two of the FHS Programme, including findings from research currently being prepared for publication.

### **3. Precautionary Allergen Labelling (PAL)**

3.1 Feedback from businesses and consumers suggests that PAL is confusing and can be applied inconsistently. We have carried out research to explore stakeholder views on the application and interpretation of precautionary allergen labelling and information including the '[May contain](#)' [consultation](#), which ran from December 2021 to March 2022, and social science research with businesses and consumers (see Annex C for a summary of the findings).

3.2 The research has highlighted the need to keep consumers safe without unnecessarily limiting their food choices, whilst ensuring solutions are workable for food businesses. We will work with businesses to ensure PAL is:

- communicated more clearly and consistently, in an understandable and meaningful way
- based on proportionate and standardised processes for assessing, managing, and communicating the risk of allergen cross-contamination by food businesses.

### **Proposed activities**

## 1. Working towards a standardised system for applying precautionary allergen label to prepacked food products

Food business want a standardised approach, with clear requirements that provide certainty and a level playing field, giving confidence that their risk assessments protect consumers.

Consumers want PAL statements on food products be trustworthy, meaningful and to enable them to understand the risk that that is being conveyed.

Examples of activities being considered are:

- **setting of allergen threshold standards:** we will review emerging evidence to establish whether best practice or legal allergen thresholds could be set for some or all of the 14 regulated allergens, for the purpose of establishing a level of allergen cross-contamination above which a PAL should be applied.
- **an update of technical guidance** to provide a best practice format and wording for PAL statements.

## 2. Supporting small and medium-sized enterprises (SMEs) to do the right thing

Generally, the smaller the business, the greater the challenge in applying PAL. This is due to a lack of understanding of responsibilities – with risk assessment/management decisions often shaped by wider food hygiene practice and heuristics (rules of thumb/ 'how things are done around here').

Examples of activities being considered are:

- **expanding Safer Food Better Business (SFBB) guides to incorporate PAL:** SFBB is our most popular business information page (with at least 368,500 hits in 2021) that details food safety regulations and management procedures for SMEs. Our research has shown there is support for this combined approach (rather than creating separate PAL guidance) to provide a one-stop shop source of information for SMEs. We will also consider how to update relevant content in the Safe Catering guides for businesses in Northern Ireland.
- **producing sector-based decision tree guides for local authorities:** to make it easier for local authorities to ask informed questions and steer food businesses into compliance.

## 3. Improving allergen cross-contact risk management and communication in the non-prepacked sector

The non-prepacked food sector faces particular challenges due to the nature of the environment food is prepared in, for example, confined spaces, with all (or almost all) allergens present in the food production space, without input from a trained allergen specialist.

Examples of activities being considered are:

- **advice on conversations with people with FHS:** information to guide staff serving non-prepacked food through the questions they should ask customers with FHS; information they should provide on allergen cross-contact; and risk management steps they could take to further control or remove this risk.
- **working with the non-prepacked sector to develop specific training.**

## 4. Allergen information and management in the non-prepacked food sector

4.1 Our policy aims for the non-prepacked food sector are:

- people with FHS have access to reliable allergen information enabling them to make informed choices when buying non-prepacked food and have confidence that the food they choose will be safe.
- food businesses have the skills and knowledge to provide accurate allergen information and manage allergens effectively.

4.2 We have examined different approaches for achieving this aim including the potential of a food allergy safety scheme; improving the provision of allergen information to consumers; and improving training for businesses.

4.3 For people with FHS, confidence that the non-prepacked food they are purchasing will be safe is dependent on two things: the information they receive from the food business about the allergens in the food; and how the food is prepared. Safety is dependent on the accuracy of the information provided by the food business, and the steps taken to manage the allergen cross-contact risks associated with the individual's FHS requirements. Consumers have different requirements depending on the severity of their FHS.

4.4 The non-prepacked food sector encompasses over 100,000 diverse food businesses from restaurants, takeaways and mobile food vans to delicatessens, caterers and hotels with diverse operating models. This makes it difficult to adopt a single solution or approach to allergen information and management, and to apply this effectively across the whole sector. Our research indicates that people with FHS and food businesses would like greater consistency in approaches to the provision of allergen information and the application of allergen management processes.

### **Assessing the potential of a food allergy safety scheme (FASS)**

4.5 The FSA Board asked for the possibility of a FASS to be examined, potentially similar to the Food Hygiene Rating Scheme (FHRS), that would provide an 'at a glance' allergen rating via a sticker on the door to enable people with FHS to make decisions on where to eat. The policy model underpinning this approach is information-based regulation.

4.6 We provided updates to the Board on our initial scoping work in December 2020 and June 2021. Following those updates we examined different potential options, including the feasibility of linking with FHRS, and tested them with consumers and businesses. A summary of the work undertaken to assess different options for a FASS is outlined at Annex D.

4.7 The evidence shows that information-based regulation model is unlikely to be effective for allergens. This is because of the nature of the risk (information-based regulation is less effective for managing higher risks) and because people with FHS are advised to seek specific information about a food business based on their personal requirements before making choices about what and where to eat. The low demand from consumers and businesses for such a scheme has been demonstrated through the market with different schemes failing to fully launch or expand.

4.8 A sticker on the door similar to, or as part of, the FHRS sticker may increase the overall confidence of people with FHS in a food business. However, it will not give the level of detailed information that they need to enable them to effectively assess allergen risks for their own hypersensitivity. People with FHS have indicated they would still need to carry out their own personal checks on a business before deciding whether to eat there. Local authorities also express concern about providing consumers with a verdict on allergens based on a 'moment in time' assessment.

4.9 Given the uncertain benefits to consumers or food businesses and the increased input required from local authorities, we consider it would be disproportionately costly to set up a scheme. There would also need to be a fundamental restructuring of how environmental health and trading standards functions work in local authorities to align their respective work to support

an allergen rating scheme. We recommend that this option is not taken forward at this time.

## **The provision of allergen information to consumers in the non-prepacked sector, including consideration of changes to current legislative requirements**

4.10 Ensuring that consumers have clear and accurate information that will enable them to understand and manage risk is a fundamental pillar of our FHS strategy and remains a priority for the FSA. We have looked at existing evidence and commissioned new research to understand consumer and food business views on how allergen information is provided in the non-prepacked food sector, and to understand their respective needs and preferences.

4.11 Our recent research includes an assessment of proposals put forward by the Owen's Law campaign focusing on provision of allergen information (see Annex E). More information about the Owen's Law campaign and the FSA's role when deaths from food-related anaphylaxis occur is at Annex G. The FSA strongly supports the campaign objective to improve the provision of information to consumers when eating out, including better training for food business staff. We are grateful to the Carey family for raising awareness of the importance of accurate allergen information when eating out, and have considered their proposals carefully, including the case for changes in the law.

4.12 The legal requirements that apply to the provision of allergen information for non-prepacked food (introduced in 2014) specify that information on the presence of the 14 regulated allergens must be provided to the consumer, and this can be in writing or verbally. Existing legislation is clear that this information must be signposted to the consumer and must be accurate. Most European countries follow a similar approach.

4.13 Our ongoing research on the provision of allergen information suggests that in the last five years, there has been a positive shift in food businesses' attitudes to catering for people with FHS, and people's experience of purchasing and eating non-prepacked food has improved significantly. Key findings include:

- 95% of businesses have an allergy policy.
- 95% of businesses use both written and verbal means of communicating information about allergens to customers.

From the range of written and verbal methods of providing information about allergens:

- 20% of businesses display written information on the 14 regulated allergens on menus.
- 30% use an allergen matrix.
- 21% require staff to proactively ask about allergens.

4.14 Our new research shows that both verbal and written allergen information is important for people with FHS and businesses, although for each group there is a different focus. For people with FHS written information is key as they want to be able to make decisions, feel in control, and have a 'normal' experience when eating out. Businesses feel that verbal communication is the most important way of interacting with the consumer (particularly as they need to amend the process in the kitchen to be certain to avoid cross-contact).

### **What needs to change?**

4.15 The progress highlighted in paragraph 4.13 is encouraging, but our research shows that there is more to do to ensure that allergen information is clear, accurate and easy to use, and that food businesses in the non-prepacked sector have the skills and support to ensure that allergens are effectively managed. Our evidence shows that achieving a step change in the provision of information in the non-prepacked sector will require system-wide focus rather than concentrating

on just one or two steps in the process.

## Views of people with FHS

4.16 People with FHS say that **written information supported by verbal communication** is the most trusted way they access allergen information. There are some instances where they consider verbal communication more important, for example, for those with a severe FHS or when they are in unfamiliar settings.

4.17 People with FHS wish to see **increased standardisation in how allergen information is presented**, although they do not want to see menus overcrowded with information and want food businesses to have flexibility of design to fit in with the business' style. People with FHS do not necessarily wish to see all 14 regulated allergens listed on menus. They prefer information on menus to show them what they can eat rather than what they cannot eat, for example, food being labelled as 'dairy-free' rather than 'contains milk'. This makes it easy to quickly scan a printed or digital menu and find suitable dishes. Where information is not provided on a menu the preference is for alternative written information, which is clearly presented and quick to navigate, and is provided before the decision-making process commences.

4.18 People with FHS also want food businesses to **ask each customer about their allergen requirements**; this is supported by a [small trial](#) we conducted in 2020 that showed that when people with FHS are asked proactively about allergens it increased their trust in the business and food safety, and their customer satisfaction.

## The context of the non-prepacked food sector

4.19 Food businesses are positive about the provision of written allergen information on menus and in an allergy matrix, and proactively asking consumers about allergies. A quarter of businesses do not anticipate any challenges implementing these three measures (although these businesses are more likely to be large businesses), and some businesses only anticipate short-term challenges in adapting to them, however it is clear that many businesses find the provision of written information more challenging and need more support.

4.20 The risk of cross-contact while food is being prepared is an important reason for consumers to not rely on written information alone. A greater focus on written information could mean a consumer is less likely to have a conversation with the business about their FHS needs and how the food preparation process can be adapted to them. The absence of an allergen in a dish as listed on a menu does not necessarily translate to the absence of an allergen in the food served, unless cross-contact risks are understood and managed when the food is being prepared. Some large businesses (see Large Chains research summarised at Annex F) purposefully do not include allergen information on their menus, as they want to encourage a conversation with consumers. They believe this approach works well in providing people with FHS with correct allergen information.

4.21 The specific context that non-prepacked businesses operate in means that **for many businesses written information will quickly become out of date**. These businesses are operating in a continuous service model, and generally in a more fluid and dynamic context than those businesses selling some form of 'prepacked for direct sale' food (although some businesses will sell both non-prepacked and PPDS food). Businesses that make prepacked items in advance of orders will be able to control the ingredients and environment the food is prepared in, to limit cross-contact. The risk is that people will place particular reliance on written information for non-prepacked food when we know there is a higher risk that this may not be accurate. For example, some businesses change their menus very frequently, some will regularly source ingredients from different suppliers (so have a less predictable supply), and many will make last minute ingredient substitutions.

**4.22 The focus in these situations should always be to provide accurate allergen information, whether that is in writing or verbally.** If a business cannot provide accurate written information it is better that this information is provided accurately and verbally, rather than incorrect information being presented to customers on a written menu. (To note, Ireland introduced a legal requirement for allergen information for non-prepacked food to be provided in writing in 2014, and a subsequent audit in 2017 indicated that compliance was low. Of the 68% of businesses that did provide written allergen information, 76% provided inaccurate information.)

### **Policy options for improving the provision of information in the non-prepacked sector**

4.23 We have considered a range of options for improving the provision of information in the non-prepacked sector, focusing on the following aspects:

- ensuring that food business staff have the right training and skills to manage allergens effectively.
- ensuring that information provided is accurate, whether given in writing or verbally.
- greater standardisation of written allergen information, making it easier to interpret and to use.
- encouraging dialogue between food businesses and consumers, particularly asking about allergens at the point of order.
- enabling enforcement officers to support businesses to meet legal obligations, and more effective penalties when the law is broken.

4.24 Our proposals for work to be taken forward in phase two of the FHS Programme are set out at paragraph 4.30 below.

It is already a legal requirement that businesses must provide accurate information about the fourteen allergens, either verbally or in writing for non-prepacked food. We have considered the case for changes to the law to mandate that allergen information must be given in specific formats, and to strengthen the responsibilities of food businesses in the non-prepacked sector. In particular, we have carefully considered the proposals from the Owen Carey campaign to mandate the provision of allergen information on menus through symbols or words for the 14 regulated allergens, and to make it the law that staff must ask the customer about allergens.

4.25 Given the findings from our recent research summarised above, we do not recommend making it a legal requirement to have allergens denoted by symbols or words on menus.

However, we agree that where businesses can provide allergen information on menus safely they should be given more support to do so. The FSA will do more to provide best practice examples and encourage a standardised approach. In particular, we will explore standardised written messaging that explains how people with FHS can get information (for example, 'ask the staff' signage'), and we will consider strengthening the legal requirements about how this messaging should be displayed.

4.26 Given the increasing numbers of non-prepacked food businesses selling food online, and the increasing importance of online food aggregators, we will ensure our training and guidance includes good practice on selling food online. We will also work with online aggregators to further develop their allergen policies (see 4.30).

4.27 We agree that proactively asking consumers about allergies is best practice, and consumers and businesses are both positive about this approach. Narrowly targeted legislation to mandate this is unlikely to be effective because it is very difficult to legislate for and enforce an interaction between individuals, particularly as any investigation would take place some time after the event and the context for the interaction would vary widely between different business models. In many non-prepacked contexts, ordering may be done online (while the consumer is within the food premises) with no, or minimal interaction with serving staff, and it is important that approaches to protect consumers are future-proofed and cover the full range of non-prepacked settings. In

addition to our work on 'ask the staff' messaging, we will work with the non-prepacked sector and with local authorities to develop a structured package of training for staff to ensure they have the skills and knowledge to communicate effectively for customers. This will include tailored content for front-of-house staff. We will also explore staff training on allergen management and whether, in future, allergen training for staff in certain roles should be made compulsory.

4.28 We will work with local authorities as we take forward the plans outlined below, including considering the introduction of civil sanctions and penalties to give enforcement officers a greater range of tools to take swifter and more effective action when breaches of food safety requirements relating to allergens occur.

### **The need for training in the non-prepacked sector**

4.29 We have given training a high priority in our proposals because this supports the whole-system approach that will ensure all staff members in non-prepacked establishments understand the importance of good allergen management and are aware of their legal responsibilities. Our [2020 research](#) found that only 49% of non-prepacked food businesses had received formal training on food allergens, clearly demonstrating that there is more to do to ensure that businesses have access to and take up high quality training. Our new research indicates that training is particularly needed in the current challenging context, as the sector recovers from the impact of the Covid pandemic. Businesses want to learn about 'best in class' models and both businesses and people with FHS wish to see increased standardisation in approaches. Our proposals for a tailored, structured series of training packages will ensure that training is focused on the end-to-end process of food preparation from the moment of ordering to the point of service and practices in the kitchen after the meal is over.

4.30 Our detailed proposals for improving the provision of allergen information in the non-prepacked sector are set out below. There is a high degree of consensus from people with FHS and from businesses about what needs to change. Although we do not propose changes to the law at this time, we do not rule this out in future, and we will ensure that we evaluate and learn lessons from the next phase, together with the evaluation from the implementation of the PPDS changes.

### **Proposed activities to deliver change in the non-prepacked sector**

#### **1. A comprehensive review of the allergen content on the food.gov website to make it clearer and easier for food businesses to understand**

- ahead of the development of new training and guidance we will make changes to the existing allergen content on the FSA website.
- [Research](#) shows that 18% of food business operators turn to the FSA helpline for information about food safety guidelines and regulations.
- There is an opportunity to make it easier for businesses to access the information they need through greater clarity on the website, which will likely to reduce the calls directed to the helpline. We aim to complete this work by December 2022.

#### **2. Continuing to encourage essential safety conversations about allergen requirements through improving the consistency and messaging of the 'ask a member of staff' signage**

- There is a legal requirement, if allergen information is not provided upfront in writing, for food businesses to clearly indicate how allergen information can be obtained for non-prepacked food. Food businesses use different methods to convey this including notices on menus and signs or posters advising consumers to ask staff.



- A standardised message tested well with consumers and food businesses in our research. Consumers would like the messages to be clearer and more consistent so that they feel more confident to discuss their allergen requirements with staff. For adults, feeling comfortable asking staff for information when eating out [correlates with better quality of life](#).
- We will also provide guidance on how this signage is best formatted and placed within the food business, so the information is as clear as possible, and is prominent so consumers can see it.
- As part of this further work, we will consider strengthening the legal requirements about this messaging.

### **3. A structured, online training programme for staff in different roles within food businesses, with progressively more specialised content for senior staff.**

- Only [half of food businesses](#) have received formal training on food allergens. Providing training that focuses on behaviour change as well as knowledge will help to make it easy for food businesses to consistently meet the needs of people with FHS.
- Level 1 would be aimed at all food business staff with a particular emphasis on front-of-house staff and those who have interactions with customers to: ensure that they understand allergens and their importance; develop effective interpersonal and communication skills; understand the legal landscape; and know how to respond in an allergen emergency.
- Level 2 would provide additional, detailed good practice processes and how to manage problems (such as supply chain issues). This level would be aimed at junior management staff and chefs.
- Level 3 would focus on leading and developing allergen management within the business and would be aimed at head chefs and more senior managers.
- The training would include certification on completion of each stage of the training to ensure full understanding of the material.
- We aim to complete the development of this training programme by December 2025.

### **4. Sector specific guidance for food businesses on allergen management and information good practice as part of wider FSA work to update and enhance Safer Food Better Business (SFBB) and Safe Catering resources**

- Our SFBB guidance is a resource that is trusted and widely used by food businesses, alongside the Safe Catering guidance tailored to businesses in Northern Ireland. We will work to produce sector specific guidance on both hygiene and allergens, that will enable different kinds of businesses to obtain good practice advice that is tailored to them for example, school caterer, restaurant, or mobile food van.

### **5. Strengthening enforcement capability through exploration of how civil sanctions, such as fixed-penalty notices, could be used**

- Current criminal prosecutions relating to allergen information and management are hard to mount because they are resource intensive and financial penalties are relatively small. The burden of proof is also greater than in the civil courts. A civil sanction would assist local authorities in their enforcement role in respect of consumer information regulations.
- For food businesses such sanctions would provide a strong financial incentive for compliance and elevate the importance of allergens. [Research](#) shows that food businesses become more engaged with allergens when they hear about consumers experiencing allergic reactions and prosecutions taking place against other businesses.
- The feasibility of this option requires further exploration, and we recommend carrying out this work and reporting back to the FSA Board later this year for a decision on how to

proceed.

#### **6. Work with the FSA's Achieving Business Compliance (ABC) programme to further develop allergen management policies amongst the online aggregators**

- Recent research we have conducted (through the [Small and Micro Business tracker](#)) indicates an increased online presence amongst food businesses selling non-prepacked food:

60% have a website and 23% take food or drink orders via their website.

71% have a social media presence and 14% take order via social media.

20% of food businesses use third party platforms to sell food and drink.

- We will ensure that our training and guidance includes good practice information when selling food and drink online. We will also link with the FSA's ABC programme Online Assurance Workstream. This work is being developed with the big-three aggregators (Just Eat, Deliveroo and Uber Eats) to explore the concept of a Voluntary Food Safety Charter that is scalable for smaller aggregators and is robustly governed.
- In addition, the ABC programme is exploring the FSA's position as a convenor and collaborator, thinking about how to best work with all different types of online businesses involved in the facilitation of food sales. This will help to identify where we can add assurance to priority areas of risk including FHS.

#### **7. Evaluation**

As part of our work we will develop robust evaluation plans to assess the effectiveness and impact of our activities using the FSA's survey work including [The Food Industry's Provision of Information](#) research as a baseline. (This research was carried out in 2020 and indicates how the provision of allergen information has improved since the 2014 legislation was introduced.)

## **5. Improving our understanding of the causes and impacts of FHS reactions**

5.1 As part of phase one of our FHS work we have been looking at how we can improve our understanding of the extent and nature of FHS reactions, particularly when people with FHS are buying food outside of the home.

5.2 We carried out Proof of Concept (PoC) testing of a food allergic reaction reporting mechanism (FARRM) which would enable consumers to self-report allergic reactions. The PoC was live on food.gov for 4 months from November 2021 and consisted of a web form to collect data from consumers to which there were links on several partner websites and social media platforms (see Annex H for a summary of the work):

- the PoC highlighted potential issues with the FARRM tool relating to data validity, and consumer and stakeholder expectations for data sharing. There were also wider considerations as to how consumer awareness and motivation to use the tool could be sustained over the long term.
- the work concluded that alternative methods of collecting data on the nature and number of FHS reactions and near misses should be explored and the FHS policy team are considering the viability of a establishing a regular FHS survey to capture the required information.

5.3 The FSA is supporting work on the UK Anaphylaxis Registry which launched on 7 October 2021. The registry serves as a platform for health care professionals to record details of anaphylaxis incidents. The study team are working on collating data from the registry to provide a better picture of the type of reactions occurring, their frequency and their geographic spread.??

5.4 Work? continues?on?the?Patterns and Prevalence of Adult Food Allergy?(PAFA) research project?which?aims to provide improve our understanding of food allergy in adulthood by determining its prevalence in the adult population.

5.5 We are carrying out work to estimate the financial costs and non-financial burden of FHS using field surveys and WTP methodology including measures of quality of life for FHS consumers. These estimates will be used to populate?a?Cost of Illness model related to food allergies, food intolerance and coeliac disease.

## 6. Recommendations

6.1 The Board is invited to:

**Consider** the progress of FHS work to date and note plans for the transition to phase two;

**Endorse** our proposed focus on three priorities for phase two:

- a) Improving Precautionary Allergen Labelling (PAL) through a more standardised approach, more support for food businesses to apply PAL when necessary, and improving allergen cross-contact risk management
- b) A new workstream to improve allergen management and information to consumers in the 'non-prepacked' sector – for example, food prepared on request in businesses such as restaurants and takeaways.
- c) Continued focus on improving our understanding of the causes and impacts of FHS reactions.

**Note** the options considered but not identified to take forward as priorities at this time, how we propose to meet the objectives for the workstreams in alternative ways and any further work required:

- a) a food allergy safety rating scheme for food businesses, similar to the FHRS scheme
- b) changes to the current legislative requirements on allergen information for non-prepacked food
- c) a central reporting tool for consumers to report 'near miss' reactions directly to the FSA.

## Annexes

- [Annex A – Summary of progress on other FHS workstreams](#)
- [Annex B – FHS Programme External Expert Panel Membership](#)
- [Annex C – Summary of PAL research and consultation findings](#)
- [Annex D – FASS research](#)
- [Annex E – Provision of information in the non-prepacked sector research](#)
- [Annex F – Allergen management in large chains research](#)
- [Annex G – Owen's Law campaign and the FSA response](#)
- [Annex H – Improving our understanding of the extent of FHS reactions](#)