



## **Precautionary Allergen Labelling (PAL) & Precautionary Allergen Information:**

**the 'may contain' consultation**

**Report on findings and summary of stakeholder  
responses**

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# Introduction

Between 6<sup>th</sup> December 2021 and 14<sup>th</sup> March 2022, the Food Standards Agency (FSA) undertook a consultation with stakeholders across England, Wales, and Northern Ireland, to gather views on the use of precautionary allergen information and labels, often written as “may contain” on food packaging. In this report, the term PAL is used to describe both precautionary allergen labels and information.

Current labelling legislation requires that food products should indicate the presence of any of the 14 main allergens used as an ingredient or processing aid. However, in cases where there is a risk of unintentional allergen cross-contact (for example where multiple foods are prepared in the same kitchen), and the food business has established the risk cannot be sufficiently controlled, it is best practice for a precautionary allergen statement to be used to communicate this risk to both the consumer and other businesses in the supply chain.

This information can be communicated in several ways:

- Precautionary allergen labels are found on prepacked foods including chocolate bars, biscuits, and other products that are sold in supermarkets, as well as those provided prepacked for direct sale (PPDS), which is food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected.
- Precautionary allergen information concerns non-prepacked foods, which include loose foods such as meals made to order in a restaurant, or vegetables and fruit sold individually on a market stall. Such information can appear on menus and signs, and also includes verbal information.

Recent FSA studies have found that consumers with food hypersensitivities – people who live with food allergies, intolerances, or coeliac disease - appreciate precautionary allergen information or labelling when it clearly tells them about an unavoidable risk of allergen cross-contact.

But consumers can also be confused by the range of precautionary statements, given the wording can differ between products, and it may not be clear precisely what the risk is.

The studies found that many food businesses are using these labels to try to protect consumers but are confused about when and how they need to do so. There is evidence that businesses need clarity on the measures they need to take to control the risk of allergen cross-contact, which then informs their labelling decision.

To help develop future guidance on the use of precautionary allergen information and labels, the consultation canvassed the views of food businesses, local authority food teams, healthcare professionals, allergy charities, consumers and other interested parties through an online survey and a series of online workshops.

## Methods

The consultation comprised a series of closed and open answer survey questions and was hosted on the Survey Monkey platform. The consultation questions focused on four themes:

1. Information provision to consumers
2. Compliance
3. Advice and training
4. Standards for risk analysis

A copy of the consultation document is provided in appendix 1.

Quantitative analysis of the consultation questions was undertaken with overall totals provided for preferred options. Percentage figures have been rounded to the nearest whole number for most questions, so not all numbers will add up to 100%.

For the open questions, a qualitative thematic analysis was conducted. Thematic analysis is a simple and flexible form of qualitative analysis that is commonly used in social research.<sup>1</sup> This approach was chosen as it provides a way of summarising

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<sup>1</sup> Braun, V. and Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, 3 (2). pp. 77-101.

patterns in a large body of data, highlights similarities and differences across the data set, and can generate unanticipated insights.

The thematic analysis comprised six steps:

- Step 1: The qualitative data is read in detail to become familiar with the text.
- Step 2: Initial codes are manually ascribed to the data, organising it into meaningful groups relevant to the consultation questions.
- Step 3: Codes that are conceptually related to one another are grouped together and identified as themes.
- Step 4: The themes are reviewed to determine whether they are internally coherent (for example, all data within them are conceptually linked) and distinct from each other.
- Step 5: The themes are then named, with the aim of capturing the essence of the data they comprise. This stage also involves the identification of subthemes, which help to provide structure to the analysis. The relationship between the codes, subthemes and themes is then captured in a thematic map and coding book.
- Step 6: The results provide a narrative summary of the relationship between codes, subthemes and themes, including the use of quotes to illustrate the essence of each theme.

## **Other written responses**

In addition to those responding to the online survey, 23 written responses were provided from business organisations, local authorities, health authorities and consumer organisations. These were analysed across the four consultation themes, using the same coding frame developed for the survey, with quotations used to illustrate key findings.

## **Stakeholder workshops**

Thirteen stakeholder workshops were held between 25 January and 17 March 2022. Workshops lasted 2.5 hours and were conducted online over the Zoom platform. After an introduction to the consultation in a plenary session, discussions were held in small break out groups of 4-5 participants. The discussions considered stakeholder views on

precautionary allergen statements in general, before exploring each of the four consultation themes in turn.

Each small group discussion was led by a moderator, with the conversation structured through a topic guide, tailored to different stakeholder audiences.

Workshops were held under Chatham House rules: namely that information disclosed during the meeting may be reported by those present, but the source of that information may not be explicitly or implicitly identified.

Workshops were video and audio recorded. Workshops were analysed via structured pro-forma to enable comparison, with thematic issues grouped in response to the consultation. Anonymised quotations were also used to illustrate key findings.

## Who responded to the consultation

A total of 2,459 consultation responses were received. The majority of responses came via the online consultation, with additional responses sent by email. A full list of respondents is contained within Annex 2. Of the overall responses:

- 84% responded as members of the public (1,882 respondents)
- 11% responded as businesses, trade body or related organisations (257)
- 2% responded as Local Authority Food Officers (44)
- 2% responded as a scientist or academic (34)
- 1% responded as a scientist, academic or clinical professional (29)

### Public respondents

The majority (97%) of the members of the public who responded to the consultation reported having had a food hypersensitivity or cared for someone with a food hypersensitivity. Nearly half (48%) had a food hypersensitivity in relation to peanuts, 43% to tree nuts, 37% cereals (including gluten), 26% milk, 23% egg, 15% sesame, 9% soybeans, 7% crustaceans, 6% fish, 5% molluscs, 4% sulphur dioxide and sulphites, 4% lupin and 2% celery.

The majority (85%) of public respondents were female and 12% were male. In terms of age, 28% were aged under 35, 54% were aged 35 to 54, and 16% over 55.

With regards to ethnicity, 90% described themselves as White, with 3% Asian/Asian British, 2% mixed of multiple ethnic groups, 1% described themselves as Black, African, Caribbean or Black British, and 1% said they belonged to another ethnic group. The majority (98%) reported English to be their main language.

Most (86%) lived in England, with 5% in Wales and 2% in Northern Ireland. This included all regions of England, ranging from 4% in the North East to 26% in the South East.

## **Businesses and other organisations with an interest in precautionary allergen statements**

Respondents from businesses, trade bodies and other organisations with an interest in the use and governance of precautionary allergen statements comprised:<sup>2</sup>

- 30% Manufacturers (104 respondents)
- 19% Caterers (67)
- 14% Local Authority Food Officers (44)
- 10% Retailers (34)
- 7% Health Organisations (24)
- 6% Trade Bodies (20)
- 5% Wholesalers (19)
- 5% Institutions - for example, schools, hospitals, care homes, nurseries (18)
- 5% Scientists, academics, or clinical professionals (16)
- 2% Transportation (7)

Of the food businesses responding, half (51%) supplied prepacked food, 46% PPDS and 43% non-prepacked or loose.<sup>3</sup> Over half (54%) stated that they apply PAL.

In terms of business size, nearly half (47%) were large, 15% were medium sized and 38% were small businesses or partnerships. The businesses and organisations that

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<sup>2</sup> A full list of organisations who responded to the consultation survey is provided in appendix 2.

<sup>3</sup> Percentages add up to more than 100, as businesses typically sold more than one type of food.

responded covered Wales, Northern Ireland, and all regions of England – ranging from 41% covering Northern Ireland to 48% covering South West England.

## Stakeholder workshops

A total of 13 stakeholder workshops were conducted, involving 125 participants across the following groups, covering England, Wales and Northern Ireland (see table 1).

**Table 1: Stakeholders involved in the workshops**

Stakeholder group <sup>4</sup>	Number of Workshops	Number of Participants
Catering	2	13
Institutions	1	7
Retail	3	23
Manufacturing	3	32
Consumer advocacy groups	1	11
Scientists, academics, and clinicians	1	15
Local Authority Food Officers	2	24

## Headlines from the consultation

The overall findings from the consultation survey are summarised in figure 1.

**Figure 1. Headlines from the PAL consultation survey**

<sup>4</sup> Trade bodies were included across catering, institutions, retail, and manufacturing sectors.



**Clear support for standardised PAL statements for prepacked foods**

A clear majority of all groups supported standardising the following elements of PAL:

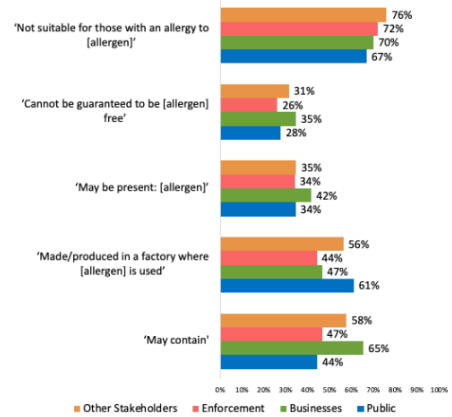
- PAL format for all prepacked foods (97%)
- Highlighted text (96%)
- Font size (90%)
- Location (89%)
- Font style (83%)
- Providing further information on why PAL is used (82%)



Support standardising PAL formats for prepacked foods

**'Not suitable for' is the preferred PAL statement wording**

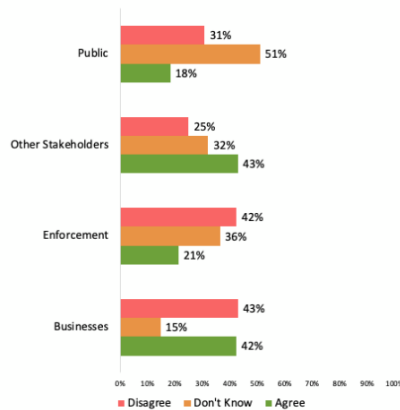
'Not suitable for...' was the most favoured wording for PAL statements across all groups.



**Current advice and guidance for businesses on PAL is inadequate**

Overall, only 25% thought that advice and guidance currently available to businesses was adequate to enable them to apply PAL appropriately.

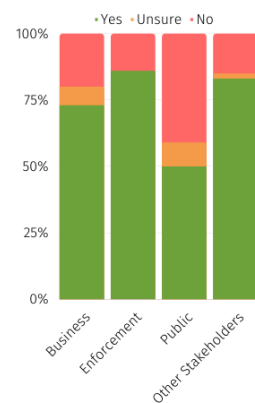
However, this was higher (although still a minority) amongst businesses (42%) and other stakeholders (43%).



**Only apply PAL when risk is unavoidable**

The majority of all groups stated PAL should only be applied following the application of a risk assessment.

This included 86% of enforcement respondents, 73% of businesses and 83% of other stakeholders



**Support for the FSA guiding standards on PAL**

There was strong agreement across all groups with the FSA legal interpretation that there could be a breach of Food Information for Consumers Regulations if:

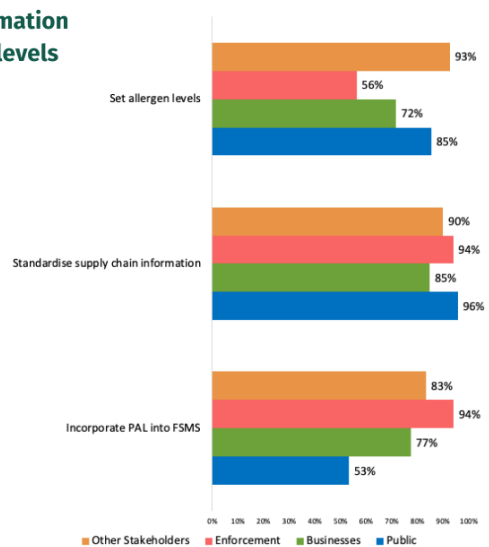
- a PAL does not specify the allergen (96%)
- a PAL and 'Free-from' are both used on a label (95%)
- a PAL is applied without assessing unavoidable risk of cross-contamination (93%)



**Standardise supply chain information and set standards for allergen levels to guide use of PAL**

There was majority support across all groups for:

- Standardising information regarding the risk of allergen cross-contamination within supply chains
- Setting standard allergen levels for prepacked foods to guide the application of PAL



Headline findings include:

- There is strong support for standardising the wording and execution on precautionary allergen labels for pre-packed foods.
- ‘Not suitable for those with an allergy to [allergen]’ was the preferred statement.
- A PAL statement should only be applied following a risk assessment.
- The current guidance for business on the use of PAL is viewed as inadequate.
- There is support for the FSA voluntary standards on PAL use, namely:
  - It should specify the allergen(s)
  - It should not be used with a free-from label for the same allergen
  - It should only be used where there is an unavoidable risk of allergen cross-contact
- There is support for standardising information regarding the risk of allergen cross-contact within supply chains and setting allergen thresholds.

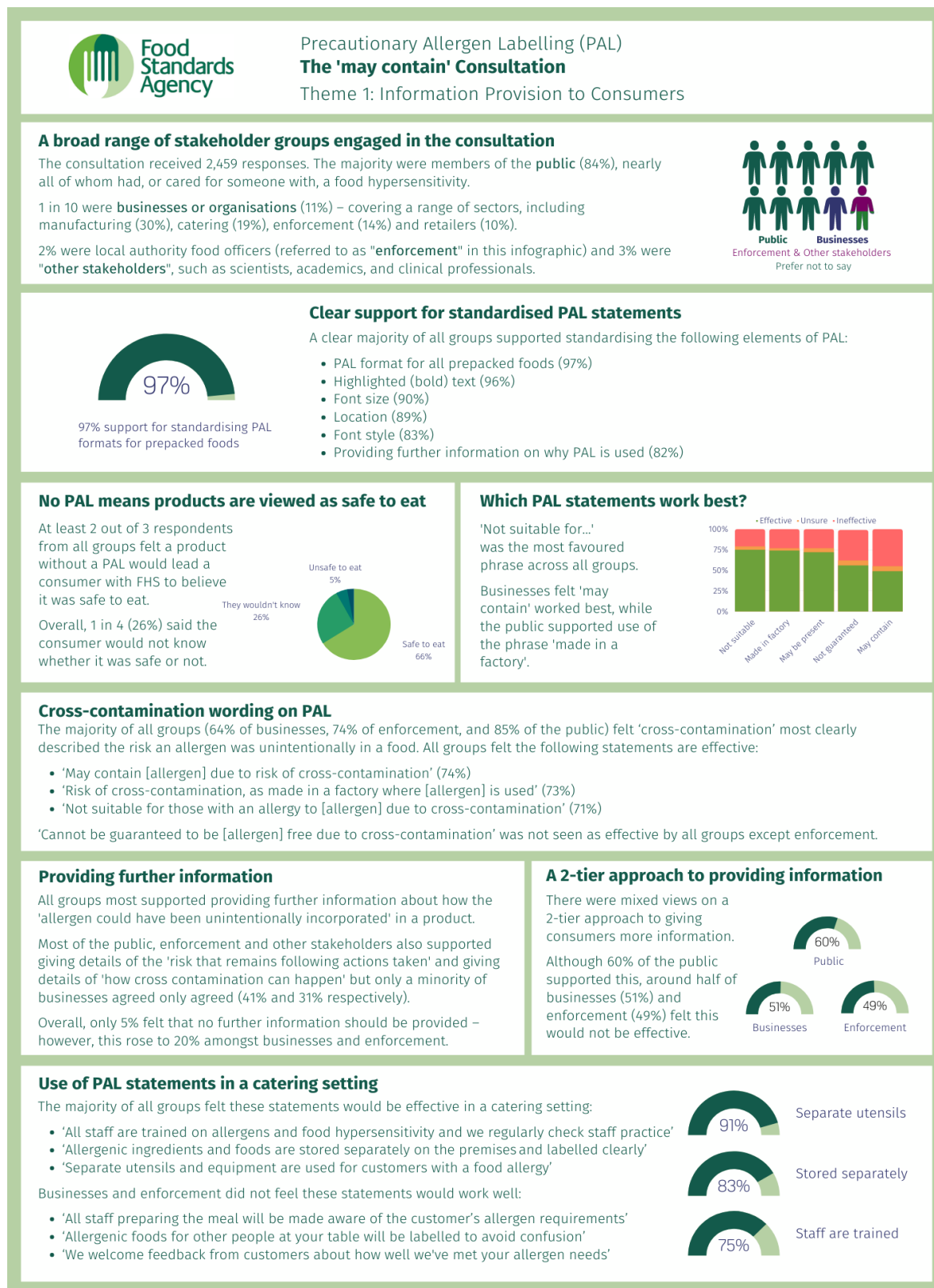
Detailed findings from each theme from the consultation survey and workshops are now explored.

## Consultation and workshop findings

### Theme 1. Provision of Information to Consumers

In this theme, the consultation explored preferences with respect to the wording and format of precautionary allergen labelling, the potential for the provision of additional information on the risk of allergen cross-contact, for example via an app or website, and the standardisation of precautionary allergen information. Headline findings are illustrated in figure 2.

**Figure 2. Headline consultation survey findings: information provision to consumers**



## PAL Statement Wording

Respondents to the consultation were asked how effective different PAL statements are at explaining that allergens may unintentionally be present in a food product, due to cross-contact risk that cannot be sufficiently controlled.

The majority of respondents felt these PAL statements **were effective**:

- 'Not suitable for those with an allergy to [allergen]' (68% effective)
- 'Made/produced in a factory where [allergen] is used' (59% effective)

Over half of respondents felt these PAL statements were **not effective**:

- 'May be present: [allergen]' (57% not effective)
- 'Cannot be guaranteed to be [allergen] free' (65% not effective)

There were mixed views on the 'May contain [allergen]' statement - 47% effective v 49% not effective.

Most consultation respondents (82%) felt the phrase 'cross-contamination' rather than 'cross-contact' most clearly described the risk that an allergen may be unintentionally incorporated into another food.

Open ended responses to the consultation also highlighted a preference for concise and clear label information to communicate cross-contact risk, and the need for precise wording that identified specific allergens:

"We favour short, simple statements as we feel these do the best job in communicating risk; too much information may unintentionally lead to a lack of clarity."

Food business, consultation response.

"Specific nuts should be stated not just grouped into 'nuts' ... 'may contain nuts' is being used as a catch all and subsequently significantly reducing the amount of

foods which can be consumed by allergy sufferers who know the specific nut they are allergic to.”

Consumer, consultation response.

## Further label information on allergen cross-contact

A series of example statements (based on existing statements but with additional wording to provide a very succinct explanation of why there is a risk) were shown to respondents. More than half felt each statement would be effective at explaining the risk of cross-contact as part of a PAL.

The preferred statements were:

- ‘May contain [allergen] due to risk of cross-contamination’ (74%)
- ‘Risk of cross-contamination, as made/produced in a factory where [allergen] is used’ (73%)
- ‘Not suitable for those with an allergy to [allergen] due to cross-contamination’ (71%)

There were mixed views on ‘cannot be guaranteed to be [allergen] free due to cross-contamination’ with 44% saying it would not be effective and 50% saying it would work.

Stakeholders feeding back in the workshops were also supportive of the principle providing standardised PAL statements to consumers, with consumer advocacy groups particularly strong in their view that this would give allergen sufferers more confidence to make informed decisions on the safety of the food they consume. However, views on the best statement wording were mixed.

Overall, simplicity was key and there was strong view that overcomplicating the label risks confusing consumers.

While acknowledging its limitations, ‘may contain’ was perceived to be sufficient for the majority of manufacturers and retailers involved in the workshops – not least as it was commonly used within the industry. The additions of suffixes such as “due to risk of cross contamination” were seen as too long, unintuitive, and adding limited value, particularly if employed on every pack. There were only limited instances where “due to risk of cross

contamination” was seen as helpful, by providing more information to consumers on the nature of the risk. This view was more common for consumer advocacy groups and a minority of Local Authority Food Officers.

Ultimately, businesses believed that consumers just wanted to know whether a product is safe for them to consume or not. Given this, the phrase “not suitable for” was seen to be a much clearer statement for consumers with serious food hypersensitivities – with particular support from retail, manufacturing and certain institutions and consumer advocacy groups, as well as Local Authority Food Officers.

“These warnings should only be used when they absolutely need to be, when there is a risk to a consumer. Having stronger wording, such as ‘not suitable for’, shouldn’t be an issue.”

Manufacturer, stakeholder workshops.

“PAL needs to help people clearly make the decision: can I or can’t I consume. ‘Not suitable for’ is better, even if it means denying some consumers a choice”

Local Authority Food Officer, stakeholder workshops.

Importantly, stakeholders across groups felt the use of this statement needed to be linked to a risk assessment so as not to unnecessarily limit the food choices of consumers.

## **Precautionary allergen labels on pre-packed foods**

The consultation also explored the potential to standardise different elements of a precautionary allergen label on pre-packed foods. Across all respondent groups, there was strong support for using highlighted text, standardising font size and standardising the label location. Views on standardising font style were more mixed, though still supported by a majority (see table 2).

**Table 2: Support for standardising different elements of a precautionary allergen label**

Consultation respondents	Font size	Font style	Highlighted text	PAL location
Public	91%	86%	98%	90%
Food businesses & trade bodies	82%	68%	88%	81%
Local Authority Food Officers	95%	58%	98%	93%
Scientists, academics, clinicians	86%	79%	93%	86%
<b>Total support</b>	<b>90%</b>	<b>83%</b>	<b>96%</b>	<b>89%</b>

In the stakeholder workshops, emboldening text was also preferred by manufacturers and retailers to changes in font style as it was easier for consumers to read – though there were some concerns emboldened text would be confused with allergens in the ingredients list.

Font size (specifically an x-height of 1.2mm) was supported, as it was in line with other food labelling requirements. Similarly, standard location of label on the product was supported in the workshops.

While larger businesses felt they could manage any change to label over a period of 18-24 months, there were concerns flagged about the costs for SMEs of additional food label changes, given recent challenges adopting allergen ingredient label changes for PPDS products.

“To change our labels again when there are other regulatory things coming in is hard. Ultimately someone pays for a label change. It’s not a free gift and gets

caught up in the cost of a product. We don't want to pass on unnecessary charges to our customers.”

Retailer, stakeholder workshops.

## **Precautionary allergen information checklist for non-prepacked and loose foods**

In addition to standardised PAL labelling on pre-prepacked foods, the idea of the standardised checklists was also explored for food businesses selling non-pre-packed foods, such as those in the catering and hospitality sectors.

In the consultation survey, the majority of respondents from all groups felt the following statements would be effective at communicating that allergen cross-contact is being managed effectively in a catering setting:

- ‘Separate utensils and equipment (for example, spatulas, trays, cutting boards) are used for customers with a food allergy’ (91% overall)
- ‘Allergenic ingredients and foods are stored separately on the premises and labelled clearly’ (83% overall)
- ‘All staff are trained on allergens and food hypersensitivity and we regularly check in on staff practice’ (75% overall)

The majority of respondents who were members of the public and those who were scientists, academics or clinical professionals, and approximately half of businesses, trade bodies and Local Authority Food Officers stated the following statements would be effective at communicating effective management of allergen cross-contamination in a catering setting:

- ‘All staff involved with preparing the meal of a customer will be made aware of the customer’s allergen requirements’ (67% overall)
- ‘Allergenic foods for other people at your table will be labelled to avoid confusion’ (77% overall)
- ‘We welcome feedback from customers about how well we’ve met your allergen needs. Please contact [XXX]’ (62% overall)

The least supported statement was ‘Where possible, foods are prepared in order of least allergenic to most allergenic to manage cross-contamination’ with overall only 44%



saying this would be effective, falling to 30% of food businesses and 25% of Local Authority Food Officers.

For all statements the public were more likely to say they would be effective than businesses. This was most markedly seen with 'Allergenic foods at your table will be labelled to avoid confusion' – with 82% of the public supporting this compared to 45% of businesses.

Detail on the differing levels of support across each option is summarised in table 3.

**Table 3: Support for standardising precautionary allergen information**

Type of Consumer	All staff involved with preparing customer meals will be made aware of the customer's allergen requirement	All staff are trained on allergens and food hyper-sensitivity, and we regularly check in on staff practice	Allergenic ingredients and foods are stored separately on the premises and labelled clearly	Separate utensils and equipment (for example, spatulas, trays, cutting boards) are used for customers with a food allergy	Allergenic foods for other people at your table will be labelled to avoid confusion	Where possible, foods are prepared in order of least allergenic to manage cross-contact	We welcome feedback from customers about how well we've met your allergen needs. Please contact [XXX]
Public	70%	76%	86%	94%	82%	47%	65%
Food businesses and trade bodies	49%	69%	61%	68%	45%	30%	42%
Local Authority	50%	63%	53%	70%	45%	25%	48%

Type of Consumer	All staff involved with preparing customer meals will be made aware of the customer's allergen requirement	All staff are trained on allergens and food hyper-sensitivity, and we regularly check in on staff practice	Allergenic ingredients and foods are stored separately on the premises and labelled clearly	Separate utensils and equipment (for example, spatulas, trays, cutting boards) are used for customers with a food allergy	Allergenic foods for other people at your table will be labelled to avoid confusion	Where possible, foods are prepared in order of least allergenic to manage cross-contact	We welcome feedback from customers about how well we've met your allergen needs. Please contact [XXX]
Food Officers							
Scientists, academics, clinicians	65%	79%	77%	65%	67%	40%	63%
<b>Total support</b>	<b>67%</b>	<b>75%</b>	<b>83%</b>	<b>91%</b>	<b>77%</b>	<b>44%</b>	<b>62%</b>

In the stakeholder workshops, catering businesses were sceptical over the usefulness of a checklist providing information on different steps to manage allergen cross-contact given the diversity of the sector. Institutions were to some extent more positive and noted that organisations such as Caterlink already provide support in this area. Nonetheless, developing a common set of information standards to work across the sector was viewed as very challenging.

Specifically, other than training, common practices were limited across the wide range of catering and institution food businesses engaged in the workshops, with only a few checklist points relevant in any given establishment. This diversity – in menus, range of equipment, size of kitchen, food preparation practices, customers served and so on – meant that it was very hard to develop a set of protocols that could be commonly adopted in foodservice, relative to other sectors.

“We do lots of different types of styles of catering... [the checklist] is too broad brush. It may work in a part of our business, but not in all our business. It would also not work for a fast-food chain. This approach is more for a manufacturing environment”

Caterer, stakeholder workshops.

More generally, the ability to meaningfully control allergen cross-contact was not seen as compatible with how such kitchens operate. Having different utensils for each allergen was impractical, the physical space in the kitchen may limit the scope for full allergen separation, and airborne allergens such as flour were seen as particularly hard to manage.

Rather, the importance of encouraging conversations between food businesses and consumers to manage allergen risks was underscored by caterers in the workshops and also cited by businesses in the open answers to the consultation.

“We would like to see greater focus on encouraging and developing meaningful conversations between the FBO and customers about the allergen cross-contact risk... The conversation between the FBO and the customer acts as the alert to the kitchen to introduce additional controls and levels of care to prevent allergen cross-contact because of a specific allergen request. An over reliance on printed precautionary allergen labelling may result in customers being less likely to inform

the FBO of their specific allergen requirement, [leading to] less control in the kitchen, and increasing risk.”

Caterer, consultation response.

In written responses to the consultation, a consumer advocacy group also highlighted their support for standard questions to encourage conversations between food businesses and consumers.

“[We welcome] a standard form of words for catering operations [to initiate a conversation], supported by the FSA and acceptable to both consumers and businesses indicating that allergens are managed within the business and additional controls can be put in place at the request of a consumer.”

Dr Hazel Gowland, Allergy Action, consultation response.

Notwithstanding this, certain caterers in the workshops were concerned about relying on staff to communicate with customers effectively (both in terms of language barriers and competency to communicate the right information) and would prefer to rely on written statements.

Academic and clinical stakeholders were more supportive of the principle of standardised information in catering establishments. However, they also raised concerns over how practical and realistic it would be to ask catering businesses (particularly SMEs) to adopt the checklist. For example, separation would likely be defined differently across business and using separate equipment for each allergen was unrealistic. While cleaning was noted as vital to manage cross-contact risks, this was challenging to validate with testing in a busy kitchen environment.

Views on standard catering checklists were also mixed for Local Authority Food Officers. While as seen as “a good example of what a business should do”, there were several barriers to adoption. Overall, checklists were seen as a relatively ineffective way to drive kitchen practice, relative to the “food safety culture in a business”, which in turn was hard to shape with voluntary guidance. Rather, allergens should be seen as a food safety issue and integrated into formal risk analysis procedures such as HACCP. Language issues and the temporary/seasonal nature of the workforce were also cited as concerns in adopting a checklist.

## Providing additional information to consumers on pre-packed foods

The idea of providing further information to consumers on the risk analysis undertaken by businesses was also explored. Such information was not intended to be provided on a food label or sign, but rather to be accessible via a website, QR code or booklet. An example of this information is given in Table 4.

**Table 4. An example of additional information to consumers**

<b>Risk analysis information</b>	<b>Risk explained</b>
Allergen that could have been unintentionally incorporated within this food	Milk
How could this cross-contamination happen	Milk chocolate can contaminate dark chocolate when the lines are changed in the chocolate factory
Actions taken by the company to reduce this risk	None – the food business has carried out a risk assessment and concluded the risk cannot be reduced
Findings of the company's risk assessment	There is an unavoidable risk that milk could unintentionally be present in the product and cause a reaction in consumers who are allergic to milk

The idea had mixed support in the consultation - stronger amongst the public and scientists, academics and clinicians, with views split amongst food businesses and Local Authority Food Officers (see table 5).

**Table 5: Support for providing further information on risk analysis**

Consultation respondents	Providing further Information
Public	87%
Scientists, academics, clinicians	79%
Food businesses and trade bodies	54%
Local Authority Food Officers	51%

Support differed significantly by category of information:

- The allergen that could have been unintentionally incorporated within this food (81%) – 85% of the public wanted this, which was much higher than support from businesses (58%) and Local Authority Food Officers (65%)
- How this cross-contamination could happen (68%) – this was largely driven by the public (with 71% wanting this), whereas businesses (31%) and Local Authority Food Officers (53%) were less likely to support this.
- Actions taken by the company to reduce this risk (56%) – although 62% of the public supported this, only a minority of businesses (24%) and Local Authority Food officers (35%) backed this idea.
- The risk that remains following any actions taken (68%) – 72% of the public and 73% of clinicians felt this should be provided, however 41% of businesses and 55% of Local Authority Food Officers agreed.

Only 5% stated that no further information should be provided – however, this rose to 20% amongst businesses and Local Authority Food Officers.

Providing additional information to consumers on risk analysis was also explored in the stakeholder workshops. The idea was not supported by the vast majority of businesses and represented a red line for certain retailers. It only had limited support from academics, clinicians, and Local Authority Food Officers – with the latter group also

voicing concerns about the ability of SMEs to comply, and issues in supporting compliance.

Whilst understanding why consumers might wish to know more detail, there were a range of practical issues identified and (with exception of consumer advocacy groups), stakeholders also challenged the idea such information would help consumers make better food choices.

Issues included:

- Very hard to execute across the wide variety of food products being made or sold.
- Routinely updating the information, given changes to the ingredients, menu or within supply chains, which would present logistical difficulties, and may lead to differences between label and website information.
- The same product can be made in different factories and present a different risk.
- SMEs would not have the information easily to hand across their supply chain.
- The example ultimately does not give enough detail on the nature of the risk, and whether the product is safe or not to consume.
- Consumers are unlikely to actually read the level of detailed information.
- It places too much onus on the customer to make a risk assessment, whereas they just need to know whether the product is likely to be safe.
- There may be issues around the accessibility of QR codes for consumers.

Illustrative quotes are as follows:

“There should only ever be one source of truth and that is the label. There will come a time when somebody forgets to update something or website somewhere.”

Manufacturer, stakeholder workshops.

“Most consumers will not be interested in this and I’m struggling to see how it helps those with allergies. It doesn’t help someone work out the risk to them and places a lot of burden on manufacturers”.

Academics and clinicians, stakeholder workshops.



“SMEs can’t get PAL labelling right, how on earth are they going to get this done. The big businesses will probably run with it because they have this information readily available”.

Local Authority Food Officer, stakeholder workshops

There are so many problems with this, I don’t know how to unpack it! We do not provide all this information for microbiology, why are we doing this here”.

Manufacturer, stakeholder workshops.

In a written response to the consultation, McDonalds highlighted the complexity of having a standardised approach to additional information within their business, given different operational practices. Rather a bespoke approach was preferred.

“Additional warning statements play the important role of allowing businesses like McDonald’s to inform customers of overarching risks inherent in a busy kitchen operation, which cannot be further controlled... However, it is important to note that these are specific to each operation and therefore cannot be standardised across industry and still convey the same message”.

McDonalds, consultation response.

Only consumer advocacy groups were positive-about the provision of additional information in the stakeholder workshops. As well as inform consumers, such information was seen to build trust in PAL, as it encouraged businesses to be transparent about their management of risk. However, advocacy groups were sceptical as to whether businesses would be willing to provide this level of information, and consequently doubts were expressed as to whether the idea would work in practice. Nonetheless, there was a strong view that businesses should be required to provide such information should a consumer request it.

“Consumers should have the right to be shown this level of information if they ask, currently this is not the case, they are not given this information. A food business should be able to talk about the thresholds of risk”.

Consumer advocacy group, stakeholder workshop

Whilst not raised in this context, should a 'right to know' form part of any future guidance, UK Hospitality highlighted the following, regarding the frequency of allergen requests for their members within their written responses to the consultation:

“The number of specific allergen requests received by members of UKH varies greatly from several allergy requests each day to an allergy request once every 3 months. Food Business Operators maintain a base level of allergen controls and then ratchet them up when a specific allergen request is received.”

UK Hospitality, consultation response.

More generally, the frequency of allergen requests was not explored.

## **A 2-tier approach for precautionary allergen labelling**

Linked to the idea of providing additional information, a potential 2-tier approach for precautionary allergen labelling was also explored in the consultation. This involved different applications of label wording depending on whether a business was willing to provide additional information on risk analysis. Example label text was as follows:

- TIER 1: Not suitable for (where no further information has been provided by a food business)
- TIER 2: Possible allergen cross-contamination / cross-contact (where further information has been provided by a food business)

There were mixed views around the 2-tier approach in the consultation responses. Around two in three public respondents and scientists, academics and clinical professionals supported the idea. However, fewer than half of businesses and local authority Food Officers supported the idea (see table 5).

**Table 5: Support for a 2-Tier approach to PAL labelling**

Consultation respondents	Level of support for 2-Tier Approach
Scientists, academics, clinicians	65%
Public	60%
Food businesses and trade bodies	41%
Local Authority Food Officers	41%

The idea received very limited support in workshops, with the system felt to be complex and hard to operationalise for businesses, and confusing for consumers given the system was voluntary. Moreover, the system linked specifically to the willingness of food businesses to provide additional information, rather than an assessment of the actual risk and was felt to undermine an evidence-based approach to labelling.

Rather greater attention was given to the principle of why such a system was felt to be needed by consumers. When considering this, the fundamental issue concerned a need to standardise the “system behind the label”, rather than the label itself.

For manufacturers in particular, PAL’s voluntary status, inconsistent application, lack of threshold standards and risk analysis processes created a lack of trust in the system. It was this lack of systemic trust which was the problem with PAL. Consumers with food hypersensitivities should be able to read a ‘may contain’ label and be reassured that a common series of standards and practices were in place supporting its use. Certain enforcement authorities also reflected this view in the written consultation response.

“This is because we have a voluntary system, as well as overuse where it's not necessary. It's not standardized. Therefore, there is a mistrust of it. If all of that behind the scenes was streamlined and sorted out, the labels would mean something.”

Manufacturer, stakeholder workshops.

“I think the thing which would really help is that it's not voluntary and that it's mandated in regulation in the same way that we do for allergens as deliberate ingredients.”

Manufacturer, stakeholder workshops.

“We need regulatory changes to make such changes meaningful as it forces businesses to take action, empowers consumers to challenge (and gives them more confidence in the statements made) and allows regulators the option to enforce, if and when necessary. Guidance in and on its own is insufficient. Needs to have teeth where necessary

Trading Standards East Midlands, consultation response.

Whilst mandating the use of PAL was not directly explored in the workshops this issue was occasionally mentioned spontaneously. It should be noted that stakeholders representing small businesses, certain large retailers and those involved in catering or foodservice were not in favour of regulating its use.

## Theme 2. Ensuring Compliance

Whilst the use of precautionary allergen labelling is voluntary, it is subject to the requirements that apply to all food information, including that it must be accurate and not misleading. The FSA has issued guiding standards on how precautionary allergen labels or information should be provided to help food business comply with those requirements.

The guiding standards are:

1. A precautionary allergen label should only be applied where an unavoidable risk of the unintended presence of allergens within a food has been identified
2. Precautionary allergen labelling statements should make specific reference to one or more of the 14 allergens regulated by UK food law, that may be unintentionally present in the food
3. Precautionary allergen labelling should not be used in combination with a 'free-from' statement for the same allergen

If precautionary allergen labelling does not meet these standards, it may be non-compliant with the Food Information to Consumers Regulation.

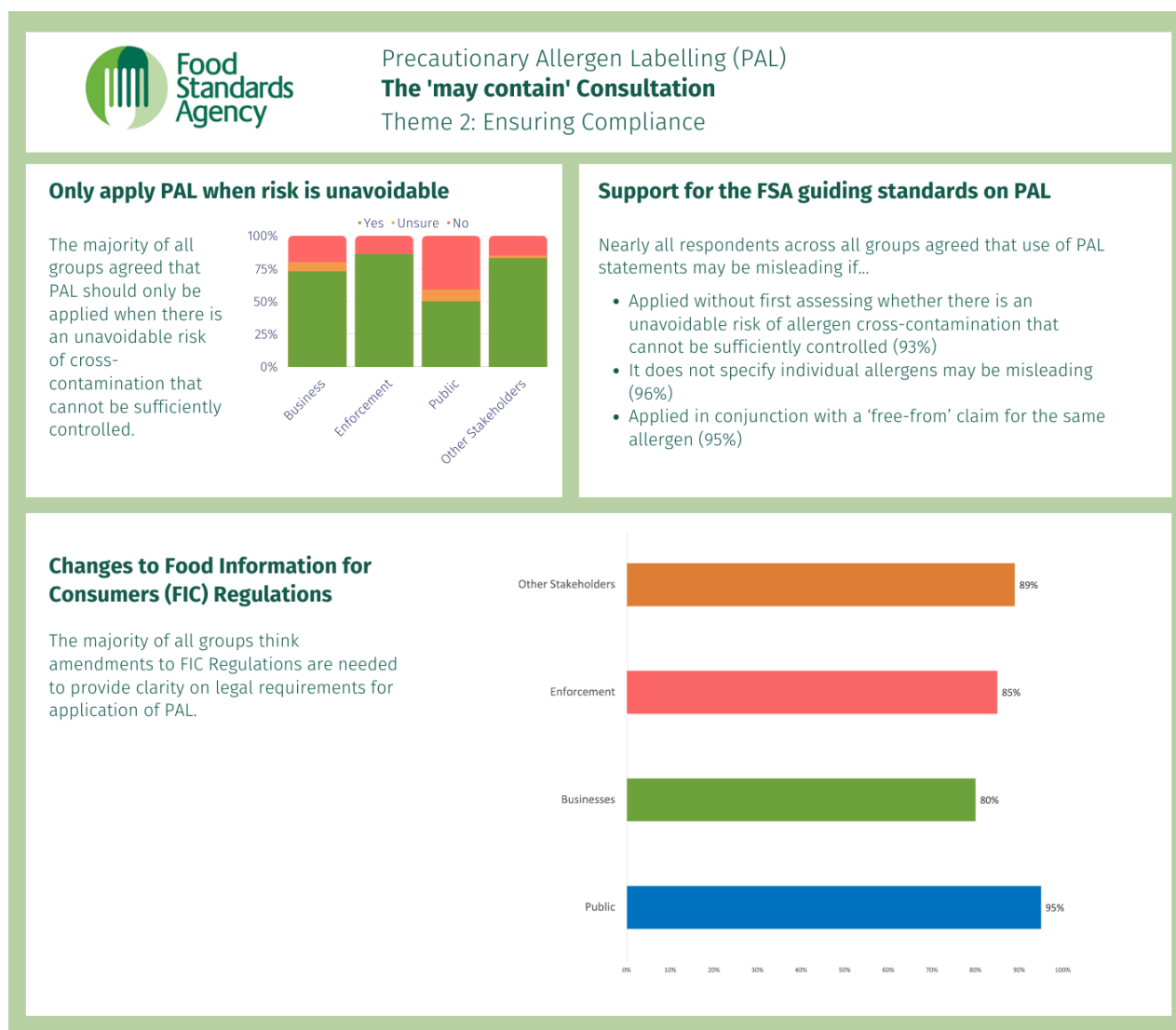
The consultation explored:

- whether PAL should **only** be used where there is an unavoidable risk of cross-contamination that cannot be sufficiently controlled
- whether the use of PAL by food businesses would be misleading if they did not adopt the standards.
- whether amendments to the FIC Regulations are needed to provide clarity on legal requirements for application of precautionary allergen statements.

Additionally, the workshops explored stakeholder views on each guiding standard in depth, exploring wording, how it may be interpreted by businesses and consumers, together with wider implications of the standards. Local Authority Food Officers also considered how these standards supported their ability to assess and control allergen cross-contact risks.

Headline findings are provided in figure 3.

**Figure 3. Headline consultation survey findings: ensuring compliance**



### Applying PAL only when there is unavoidable risk of cross-contamination

Just over half (54%) of all respondents believed a precautionary allergen label or precautionary allergen information should only be applied when there is an unavoidable risk of cross-contamination that cannot be sufficiently controlled, with over a third (38%) disagreeing, saying such statements can serve other purposes (including 41% of the public).<sup>5</sup>

<sup>5</sup> Open ended responses did not provide detail on the 'other purposes' the public felt a PAL can serve.

However, the clear majority of scientists/academics (93%) Local Authority Food Officers (86%) businesses (73%) and clinical professionals (71%) felt precautionary allergen statements should only be applied in these circumstances.

### **Views on the three guiding standards**

Nearly all respondents (from all respondent types) agreed with all 3 of FSA's standards for how PAL should be applied, agreeing that it may be misleading if:

1. PAL is applied without assessing unavoidable risk of cross-contamination (93%)
2. PAL does not specify the allergen (96%)
3. PAL and 'free-from' are both used on a label (95%)

Overall, stakeholders involved in the workshops were also in agreement with the standards.

However, they raised the following issues when exploring the detail of each statement. Where relevant, feedback is also provided from written responses to the consultation.

### **Statement 1: A precautionary allergen label should only be applied where an unavoidable risk of the unintended presence of allergens within a food has been identified**

Most stakeholders, including consumer advocacy groups, expressed concerns over the terms 'unavoidable risk' and 'unintended presence' in this statement. These terms were seen as subjective, open to interpretation across the supply chain, and may result in an overuse of PAL to the detriment of consumer choice. To avoid misinterpretation, it was imperative for the standard to be underpinned by reference doses and common assessment methods. This view was also reflected by a range of industry bodies feeding back in the consultation.

"If it is to be used to define a potential breach of the Food Information to Consumers Regulation, further clarification is required, particularly with respect to

definitions for 'unavoidable risk' and 'sufficiently controlled', and threshold levels should be set."

Provision Trade Federation, consultation response.

"It's a meaningless bit of guidance, because everything's got a risk. We need to specify a safe level, or PAL labelling will be everywhere and not useful for a consumer".

Manufacturer, stakeholder workshops.

"FSA should concentrate on getting all companies to undertake a risk assessment and make sure a common risk assessment approach is used, together with a coherent risk communication through the PAL statement"

British Retail Consortium, consultation response.

When setting standards, and considering the wording for guidance to businesses, a range of materials were cited as instructive including:

- VITAL programme.
- Codex work 'acceptable risk'.
- The Orange Guide (developed by the FSA in 2006 by to establish principles for risk analysis).
- FAO/WHO Expert Consultation on Risk Assessment of Food Allergens.

A common theme across stakeholders concerned the ability of smaller businesses to comply with this standard.

"The statement will be interpreted differently depending on the tools the business has and also the size of business. Each business would have a different ability to control their risk. So, I think the same statement would be interpreted different depending on the business context, and it will be hard for many SMEs to comply"

Clinicians and academics, stakeholder workshops



Only a minority of retailers and those involved in enforcement and compliance felt that the term 'unavoidable risk' was clear and straightforward, and believed it would prevent the overuse of PAL statements.

## **Statement 2: Precautionary allergen labelling statements should make specific reference to one or more of the 14 allergens regulated by UK food law that are unintentionally present in the food**

This standard was supported as it helped provide clear information to consumers and gave an internationally agreed focus for the use of precautionary allergen labelling.

Consumer advocacy groups and manufacturers discussed whether the list of 14 allergens may need to be reconsidered given the prevalence of each in the population, plus the wider range of allergies that consumers suffer from. There were also minor concerns to whether 'tree nuts' should be listed individually on a PAL statement. These points notwithstanding, there was limited appetite to extend the list, beyond a small number of consumer advocacy groups, not least due to potential EU and international trade implications.

Manufacturers, clinicians, academics and consumer groups were concerned about SME's knowledge of and attentiveness to the existing 14 regulated allergens.

While uncommon allergies, lupin flour and celery were highlighted as having low eliciting dose thresholds, so very serious for consumers at risk. Education and awareness raising was seen as fundamental in this context. Institutions also flagged the cultural diversity of the sector as potentially influencing staff's ability to understand guidance and compliance, given the range of SMEs where English was not the main language spoken.

"The fact that SMEs didn't know about lupin, says there's something wrong with the education of those SMEs, or their lack of ability to go and find the information that they need. Being ignorant to the fact that Lupin is an allergen isn't a defence in law?"  
For me, it comes back to the need for training, awareness, education."

Manufacturer, stakeholder workshops.

"I want to plead the FSA put effort into making sure that small business understand that food allergies are real, and each allergen is serious. And from that foundation,

businesses need to understand how much is too much. And what good, standardised risk analysis and risk communication looks like.”

Clinician and academic, stakeholder workshops.

In addition to SMEs, the practical implications of managing cross-contact and compliance in a catering setting was seen as very challenging to manage - effectively meaning that precautionary allergen information risks becoming ubiquitous in such businesses.

If one of the fourteen [allergens] is in your business, in your open kitchen, open environment, there almost is an unavoidable risk of unintended presence”

Caterer, stakeholder workshops.

“We agree that a precautionary allergen labelling statement should state which allergens may be present. However, on a practical level this could lead to a long list of allergens potentially present.”

Provision Trade Federation, consultation response.

Rather, broad statements covering multiple allergens were preferred by caterers, with greater focus placed on a conversation with a consumer to discuss specific allergen risks.

Related to this, and identified as a gap, enforcement and compliance stakeholders wanted to see guidance on how catering businesses should engage with specific requests for a non-allergenic meal, how controls are managed, and how to judge whether the risk is acceptable.

### **Statement 3: Precautionary allergen labelling should not be used in combination with a ‘free-from’ statement for the same allergen**

While all stakeholders agreed with this statement, it prompted two areas of discussion.

The first related to safety thresholds. On the one hand, while gluten-free products had thresholds, there were differing impacts of reference doses for consumers with a wheat

allergy versus those with coeliac disease. On the other, other than sulphites, threshold levels still needed to be established to guide the use of 'free from' for many other allergens.

The second related to how information for food hypersensitive consumers may be influenced by other product labelling. For example, vegan products also had potential risks of dairy and egg cross-contact, and could be combined with a PAL. Given 'vegan' may be used as a proxy by food hypersensitive consumers, a concern was raised over whether vegan labels should also be covered by this standard.

“One area that needs consideration is 'vegan' or 'dairy free' claims on labelling which also have 'may contain' statements.”

Provision Trade Federation, consultation response.

“I would like 'vegan' added alongside free-from. It provides a lot of confusion to consumers, who would see milk and egg free as interchangeable with vegan labelling. It would be assumed as being safe for those with that allergy.”

Local Authority Food Officer, stakeholder workshops.

In their written response, the Food and Drinks Federation also noted they had provided some clarifying information for both the businesses and consumers on this issue (Allergen-Free and Vegan Claims Guidance - 2020).

Overall, when developing standards, a range of stakeholders felt the FSA need to take a more systemic look at the food labelling ecosystem, of which PAL is a part.

## **Amendments to Food Information to Consumers (FIC) Regulations**

The vast majority (93%) of consultation respondents agreed that amendments to FIC Regulations are needed to provide clarity on legal requirements for the application of PAL. This was the same across all respondent types, with 80% of businesses, 88% of scientists and academics, 85% of Local Authority Food Officers and 90% of clinical professionals agreeing with this. In its written response, the Food and Drink Federation also noted that “legislative change that isn't a barrier to trade would work”.

However, there was disagreement as to whether this was needed by a retail industry body, who stated that that clearer guidance, rather than regulatory change, should be sufficient.

“We do not believe a change in the law is necessary. Lack of clarity can be addressed through robust and clear guidance.”

British Retail Consortium, consultation response.

Overall, any changes to regulations should be mindful of implications to EU-NI/GB trade and avoid unnecessary regulatory divergence which could potentially impact exports. It was also seen as important by stakeholders that the global regulatory landscape is taken into consideration, with steps taken towards international harmonisation.

### Theme 3. Advice and training

This pillar of the consultation is focused on the provision of advice and training to food businesses regarding precautionary allergen labelling.

Currently, there are sources of advice on the FSA website (food.gov.uk) to help support businesses in applying precautionary allergen labelling and how to provide precautionary allergen information to consumers. These include:

- Food allergy and intolerance online training
- Technical Guidance on food allergen labelling and information requirements

Additionally, the FSA has produced guidance aimed at smaller businesses, covering a four-step process for risk analysis and an 8-point checklist on precautionary allergen labelling. These are summarised in the table 6 below.

#### Table 6. FSA guidance for small businesses on risk analysis and a checklist on precautionary allergen labelling

##### 4-point process on risk analysis

1. Risk assessment – What is the risk?
2. Risk management – Can the risk be managed? What actions could reduce the risk?
3. Risk communication – How should the risk be communicated?
4. Risk review – Has the risk changed? How frequently will you review your system?

##### 8-point checklist on precautionary allergen labelling

1. Identify potential sources of allergens
2. Identify points of allergen cross-contamination
3. Remove or substitute allergens
4. Separate allergens
5. Clean points of allergen cross-contamination
6. When to apply PAL

## 7. How to apply PAL

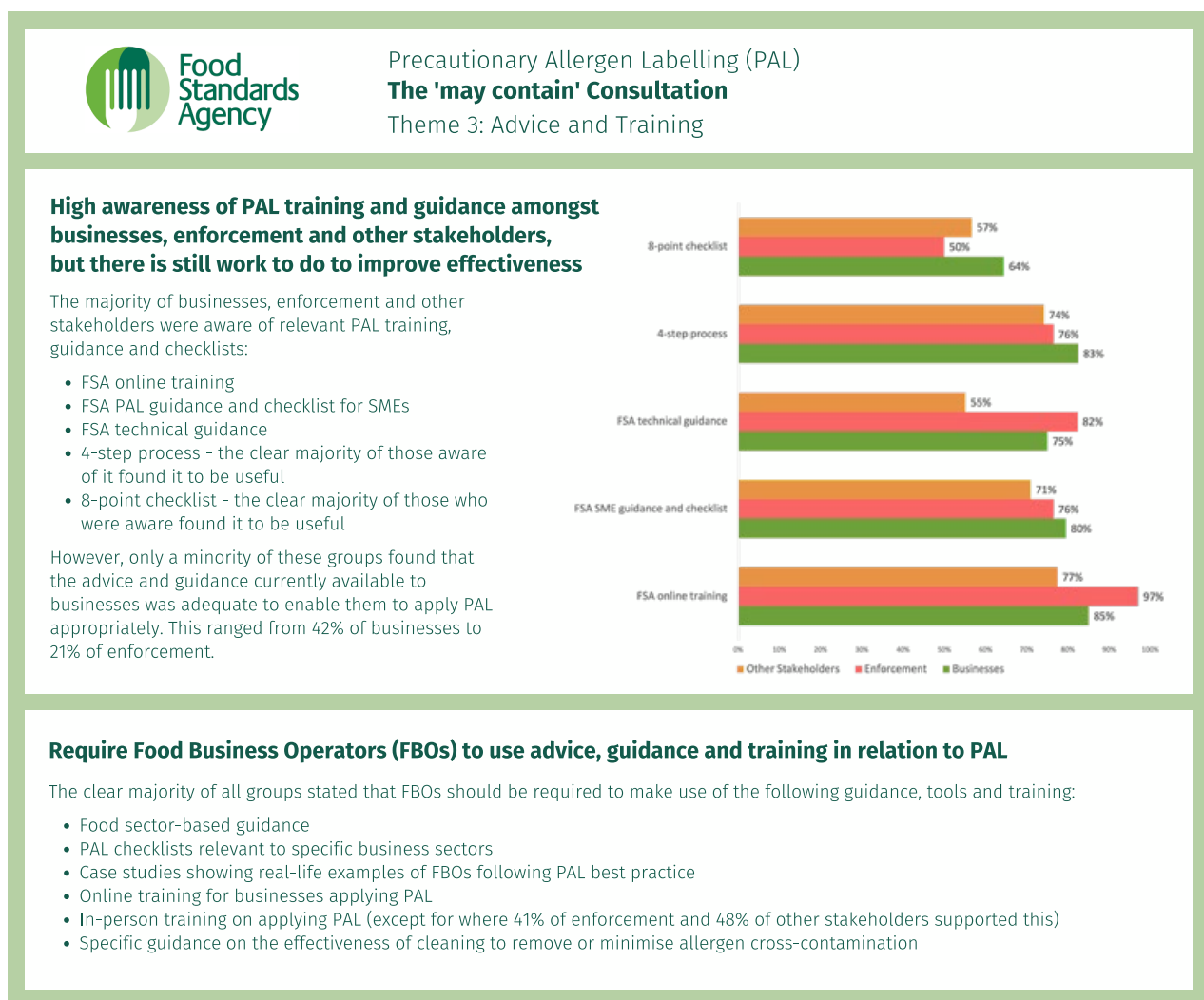
## 8. Review

The consultation sought to understand levels of awareness and use of the array of FSA training and advice, together with its adequacy, and whether further support is needed.

In the stakeholder workshops, training provided in general for food businesses on allergens and precautionary allergen labelling was explored: including in-house training; that provided by other organisations; and that provided by the FSA. The 4-point process for risk analysis and the 8-point checklist, shown in table 6 above, were also explored in depth.

Headline findings are summarised in figure 4.

**Figure 4: Headline consultation survey findings: advice and training**



## Training on allergens and PAL in general

Overall, only 1 in 4 (25%) of consultation respondents felt advice and guidance currently available to businesses is adequate to enable them to apply PAL appropriately - this was lowest amongst members of the public (18%) and local authority Food Officers (21%), with 44% of businesses also stating guidance was not adequate.

In the open-ended responses, the perceived overuse of PAL labelling was identified by members of the public as indicative of problems with the current training support.

In terms of specific training and advice resources provided by the FSA, as might be expected, awareness was high amongst Local Authority Food Officers and businesses, and much lower amongst the public.

Specifically:

- 97% of Local Authority Food Officers and 85% of businesses are aware of FSA food allergy and intolerance online training compared to only 33% of the public
- FSA technical guidance (82% of Local Authority Food Officers and 75% of businesses v 18% of the public).
- FSA PAL guidance for SME food businesses with accompanying checklist (80% of businesses v 30% of the public).

When exploring training in the stakeholder workshops, all businesses mentioned that they undertook training specifically on allergens management and labelling, though a focus on PAL statements specifically was less common.

Training provision was from a variety of sources, with the most common being provided in-house for larger businesses and provided by trade organisations and membership bodies for smaller businesses.

Providers included:

- Specialist organisations such as Reading Scientific Services Ltd (RSSL), Campden BRI, Highfield, Jacqui's Allergen and Catering Specialist (JACS Ltd).
- Trade bodies such as British Retail Consortium, and the Association of Convenience Stores.
- Consumer advocacy and support groups, such as Coeliac UK's gluten-free accreditation scheme, Allergy UK, and safefood.

- Expert programmes or associations, such as VITAL, Codex and FoodDrinkEurope
- Advice from Environmental Health Officers and the local authority.

FSA online training was directly used by a range of stakeholders. While viewed as “accessible and useful”, it lacked the detail to be of operational use to larger businesses.

There was a view that FSA training provision could be better tailored by business size and sector, and greater collaboration between the FSA and trade bodies in developing guidance was encouraged.

It was common, particularly in catering and institutions, for training to be subsumed within broader food hygiene courses and accreditations. Commonly this included food hygiene level 2/3 training and courses provided by Royal Society of Public Health.

For manufacturers, training was also geared towards food hygiene in general, and typically focused on risk assessment and HACCP processes, into which allergen management was provided as a module.

Typically, allergen training focused on those directly involved in food production and undertaken as part of staff induction, with periodic refreshers undertaken every 12-24 months. Larger retailers and manufacturing businesses would also train people involved indirectly in food production (e.g., product development), and also invest in training across their supply chain.

Beyond resources (time, money), challenges with training included:

- Changing regulations, and the need to retrain people
- Seasonal and temporary nature of labour, particularly for catering establishments
- Language barriers

A lack of detail on quantitative risk analysis for PAL and specialist support for SMEs were cited as particular training gaps.

## **Guidance for small businesses on risk analysis and a checklist on precautionary allergen labelling**

When considering the risk analysis guidance and 8-point checklist for small businesses:



- 83% of business responding to the consultation stated they were aware of the 4-step process for risk analysis, with the majority (84%) of these saying it is useful in helping food businesses manage allergen cross-contamination.
- 64% of businesses said that they were aware of the 8-point checklist on PAL with the majority of these (84%) saying it is useful in helping food businesses manage allergen cross-contamination.
- Half (52%) of businesses and 48% of local authority Food Officers were also aware of other sources of information relating to PAL.

Awareness of the guidance and checklist was reported as much lower in the stakeholder workshops with typically a couple of individuals per sector aware (and marginally higher for manufacturers). This in part may be because larger businesses were generally represented at these workshops, and the guidance was written for SMEs.

When reviewing the 4-point risk analysis process and 8-point checklist, the guidance was believed to be a good starting point with the following strengths:

- Straightforward, concise, and clear, making it easy for SMEs to understand.
- Followed established and well recognised risk analysis processes.
- Good as an introduction to the area, for newer or simple food businesses.
- Complemented work already undertaken in their business.
- Potentially a way of communicating to consumers the expectations of a business when complying with good practice.

Perceived weakness with the guidance included:

- It was too high level and basic, and lacked the detail needed for effective risk analysis and management (though it was noted that greater information underpinned each principle, which they had not reviewed).
- It didn't explicitly define risks across different allergens, or highlight the risks from different particulate sizes, with implications for risk management.
- Supply chain risks were not adequately covered in the guidance or checklist.

- The guidance needed to be integrated into existing processes (e.g., HACCP) and guidance (e.g., Safer Food, Better Business), rather than being a separate document.
- There was a need for clear standards and common methods for risk analysis (rather than just overarching principles), as different approaches yield inconsistencies across the supply chain.
- There was a focus on visual inspection in the current guidance (rather than swabbing validation), meaning risks may not be managed adequately (though it was recognised as costly for food businesses to introduce routine swabbing).
- “Risk analysis” and “cross contamination” were seen as poorly understood by SMEs, and there was concern that language in the more detailed guidance may be too technical for such businesses, or not meet their needs.
- The practical implications of certain steps in the checklist were seen as hard to adopt, such as the ability to separate allergens during use, remove or substitute an allergen, or clean equipment between the preparation of different products and dishes. While this was a particularly significant for catering businesses, manufacturers also stated they would struggle to comply given their range of product lines, and constraints of the production process.
- Guidance needed to be tailored to sectors and use clear examples of how to assess and manage risk.
- While helpful, checklists were not viewed as effective drivers of behaviour and in themselves did not build consumer trust, without compliance and enforcement.

“On the surface, the checklist looks straightforward. But how that is supported with advice to businesses on how they actually comply? It needs meaningful examples, so businesses know what needs to be done”

Local Authority Food Officer, stakeholder workshops.

“[The checklist] seems more geared for manufactures than catering. Kitchens are not perfect, linear environments. We can’t clean equipment between each meal or keep things completely separate. All kitchens have a different workflow, and one-size fits all guidance won’t work”.

Caterer, stakeholder workshops.

“The luxury of having different factories or different lines to produce goods just doesn't exist”

Manufacturer, stakeholder workshops.

“Most suppliers would be using HACCP so why would you point them down another route with another tool.”

Retailer, stakeholder workshops.

“Businesses should have to prove that they have followed each step. This is what would increase trust”.

Consumer advocacy group, stakeholder workshops.

These themes were mirrored by the feedback by business respondents to the consultation. There were several additional issues raised including the need for guidance and training to be:

- tailored to schools and nurseries
- mandated for all people working with food
- audited, to ensure it is being adopted
- inclusive of the experiences of food hypersensitive consumers.
- consistent, including when rolled out across local authorities and compliance officers.

In terms of how the FSA could better support the delivery of advice and training, getting the initial communications right to raise awareness of the issues and potential changes was seen as very important. This would need to be sector specific, account for the distinctive needs of SMEs and cover a range of community languages.

Given the guidance is voluntary, getting the balance right between encouraging change, whilst not being a significant burden on business, was essential. Thinking about how guidance on PAL relates to recent changes on allergen ingredient labelling on pre-packed for direct sale (PPDS) foods is needed, so as not to create confusion with SMEs.

Stakeholders would ideally like to see the FSA offering online content, face-to-face support and a helpdesk. But given resource constraints, it was perceived by stakeholders that the FSA would need to focus advice provision online.

However, Leicester council noted in their response to the consultation that, to be effective, one-to-one training may be required for smaller food businesses.

“Our experience is that most small independent businesses will have a preformed view on whether they will agree to a consumer request to make an allergen free meal and this guidance is unlikely to change their viewpoint. Most micro businesses respond far better to one-on-one training”

Leicester Council, consultation response.

Local Authority Food Officers in the stakeholder workshops highlighted the lack of resources to provide advice and support compliance. The range of demands on officers' time, and the scope of what a single inspection can cover, would also inhibit the roll out of guidance. In certain authorities, a lack of “feet on the ground” was also a significant barrier, compounded by issues with recruitment and retention of officers.

The FSA also needed to support consumer education and provide realistic expectations for managing cross-contact in different food business settings, and corresponding limits to consumers choice.

These themes were mirrored in the consultation responses. There was a strong view from business that guidance needs to be clear, sector specific and have separate provision for SMEs and micro businesses. There was also seen to be a need-for access to training on the FSA website to be simplified, with a portal on a single web page (rather than multiple pages spread across multiple sites).

Overall, it was recognised that the FSA cannot do this alone, and it was important to join up with trade bodies and consumer advocacy groups to get the message out, develop sector specific guidance practice and build trust.

## Theme 4. Standards for risk analysis of allergen cross-contact

Allergen cross-contact occurs when an allergenic food, or ingredient, is unintentionally incorporated into another food that is not intended to contain that allergenic food.

In the context of precautionary allergen statements:

- **Allergen** means an otherwise harmless substance capable of triggering a response that starts in the immune system and results in an allergic reaction in certain individuals. In the case of foods, it is (almost always) a protein which is found in food capable of triggering a response in individuals sensitised to it.
- **Allergen cross-contact** occurs when an allergenic food, or ingredient, is unintentionally incorporated into another food that is not intended to contain that allergenic food.
- **Risk analysis** refers to the overall process of assessing, managing, communicating, and reviewing allergen cross-contact risks.
- **Risk assessment** refers to the systematic process of identifying and assessing potential allergen cross-contact risks.

**Risk management** refers to the process of taking actions to control allergen cross-contact risks. Currently, definitive standards for the risk analysis of allergen cross-contact within food supply chains are lacking. Recent research for the FSA found that smaller food businesses take very different approaches (both to one another and to larger businesses) to assess and control risk before applying precautionary allergen statements. This is likely to result in the inconsistent application of PAL across sectors and within the supply chain.

In this section of the consultation, respondents were asked whether approaches and information to document risk analysis should be standardised.<sup>6</sup> Respondents were also asked whether the assessment of allergen cross-contact risks should be integrated into a

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<sup>6</sup> This theme was the most technical of the consultation. Whilst explanations of various terms were provided in the consultation documents, there is likely to be very different levels of knowledge across public versus other groups of what risk analysis are currently conducted by different food businesses and potential changes to such practices would involve.

Food Safety Management System (FSMS) - a systematic approach to controlling food safety hazards to ensure that food is safe to eat.

Headline findings are shown overleaf in figure 5.

**Figure 5: Headline consultation survey findings: standards for risk analysis**



Precautionary Allergen Labelling (PAL)  
**The 'may contain' Consultation**

Theme 4: Standards for Risk Analysis of Allergen Cross-Contamination

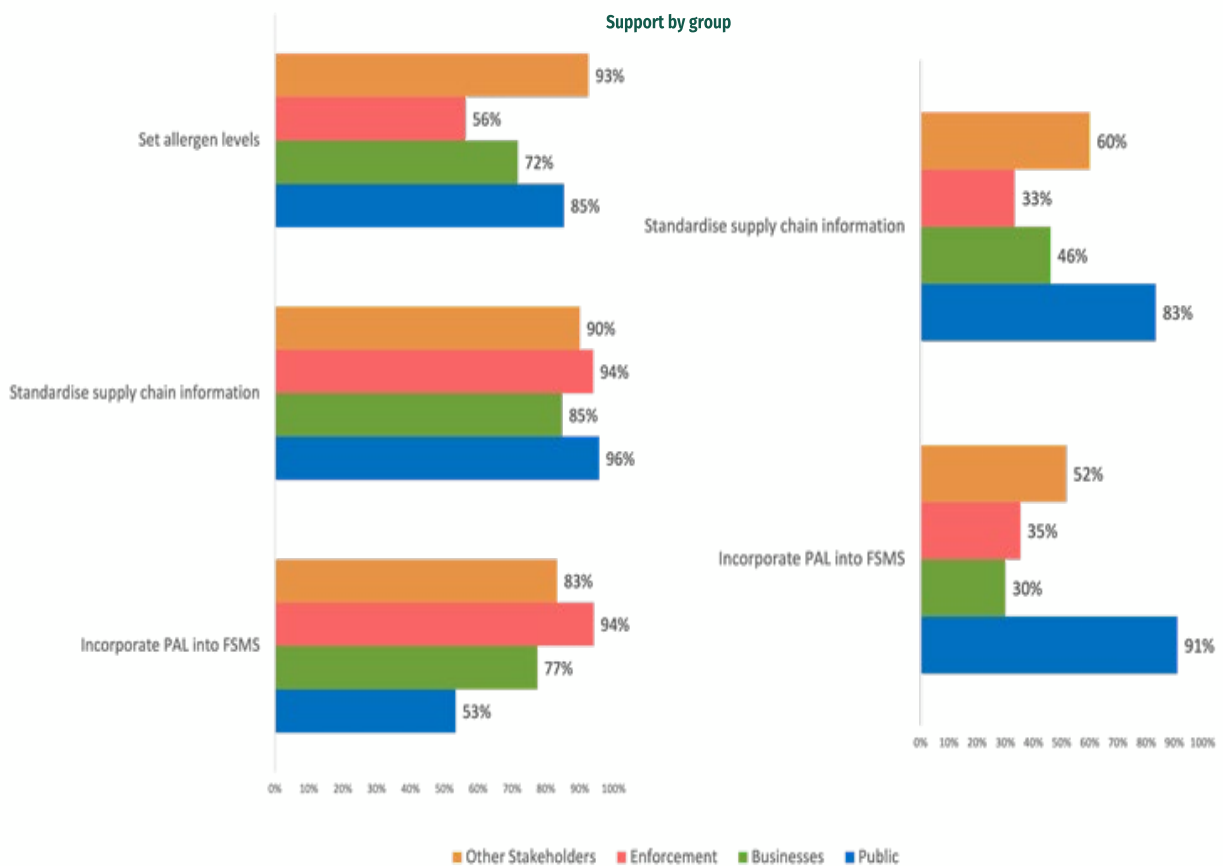
**Incorporate PAL into Food Safety Management Systems (FSMS), standardise supply chain information and set standards for allergen levels to guide use of PAL**

There was majority support across all groups for:

- Incorporating PAL as part of a FSMS
- Standardising information regarding the risk of allergen cross-contamination within supply chains
- Setting standard allergen levels for prepacked foods to guide the application of PAL

There were mixed views on the following proposals - with a lack of support from businesses and enforcement, but with the public being more in favour:

- Requiring business to make risk-assessment management process public (only 30% of businesses and 35% of enforcement support this)
- A new accreditation scheme to ensure standards for risk analysis (only 46% of businesses and 33% of enforcement support this)



All groups supported standardising the allergen information provided with food products and within supply chains, the establishment of thresholds (allergen levels) to guide application, and the incorporation of PAL into a FSMS.

However, there was disagreement about whether this information should be made open to the public and if there was a need to develop an accreditation scheme – notably in terms of public views (who were supportive) compared to food businesses and those involved in enforcement and compliance (who were not supportive).

Consultation findings were as follows:

- Standardising information regarding the risk of allergen cross-contact within supply chains (93% support).
- Set a standard for allergen levels to guide PAL application for prepacked foods (81%).
- Businesses to make their allergen risk assessment and management processes available to the public (72%).
- PAL should be incorporated as part of an FSMS (62%).
- A new accreditation scheme would be a good way to ensure standards for allergen risk analysis (71%).

The clear majority of all respondent types supported both standardising information within supply chains and setting a standard for allergen levels to guide application for prepacked foods.

However, while 91% public supported a requirement for businesses to make their allergen risk assessment and management processes available to the public, only a minority of businesses (30%) and Local Authority Food Officers (35%) supported this action.

Fewer than half (46%) of businesses and only a third (33%) of Local Authority Food Officers supported a new accreditation scheme, whereas 83% of the public felt this was a good idea.

Businesses (77%), Local Authority Food Officers (94%) and scientists/academics (100%) were much more likely to support PAL being integrated as part of an FSMS than the public (53%).



Several of these issues were discussed in the stakeholder workshops as well as highlighted in the open-ended responses to the consultation. These are now explored.

## Standardising information and risk analysis principles

Providing standardised information on the risk analysis of allergen cross-contact, though viewed as hard to achieve, was seen by stakeholders as the foundation for effective PAL application.

“We believe [standardised information across the supply chain] is very important”

Pret, consultation response.

Ideally, food businesses would be able to know:

- Qualitative information concerning what practices had been undertaken to identify and manage cross-contact risks: for example, secure transport, separate storage, clear labelling, distinct production lines, cleaning and so on.
- Quantitative information concerning testing. Testing comprised two aspects:
  - product tests, to establish the amount of an allergen unintentionally present in a final product (and whether it exceeds a safe threshold level)
  - swabbing and cleaning validation tests, to evaluate the amount of an allergen residing on a food contact surface (for example, machinery) after cleaning as part of the production or preparation process.

It is this combination of information that enables a business to understand whether steps to identify and managing allergen cross-contact is effective (both within their business and across the supply chain); and consequently, whether a PAL should be used.

While testing was seen as a fundamental part of this process, alone it was not sufficient and ultimately its use was to validate the effectiveness of allergen management practice.

“A structured risk assessment enables manufacturers to put a clear and consistent message on packs, which is then backed up by legislation or guidelines or whatever it is that we decide is the best way forward”

Manufacturer, consultation response.

“A good system would resemble something that had qualitative statements validated by quantitative testing. While quant is an important weapon in your armoury, it’s about how a factory is actually managed.”.

Retailer, stakeholder workshops

“Testing doesn't make the product safe. It's about the risk assessment and using testing to validate your cleaning”

Retailer, stakeholder workshops.

While supporting the principle of standardisation, practically implementing steps to create consistency across supply chains was seen as very challenging. The extent to which food businesses either collected or could be expected to collect such information varied considerably, and was driven by:

- Size of business: with concerns that SMEs lacked resources and expertise to conduct effective risk analysis.
- Sector: with concerns that it was impractical for catering businesses (or others working in open food production and processing environment) to assess and manage cross-contact risks effectively.

“The same standards and expectations for testing cannot be applied across the board as there is a huge cost to this. It's impractical to expect catering businesses to test products for allergens”.

Catering, stakeholder workshops

Even for manufacturers, and retailers producing prepacked foods, testing and cleaning validation was seen as expensive and difficult to adopt routinely – and there was a significant need for “reliable, accurate, affordable, and rapid” testing procedures across the industry.

Effective testing was also challenging given how risks present themselves. Depending on the size of the particle and the nature of the cross-contact risk, allergens can have more a uniform or random distribution throughout a product, and have different associated hazards.

There were numerous examples given of cross-contact risks that presented themselves randomly, from how sulphites in beer can occasionally be produced during the manufacturing process, to how particulates may transfer between product lines. These are not well suited to identification by testing:

“Testing only works when the contamination is homogenous. They would not work when the cross-contact is pieces of hazelnut”.

Manufacturer, consultation response.

In their written consultation responses, Allergy Action and Pret also cited that guidance was needed on cleaning validation testing, which was a significant issue for the catering sector.

“One major knowledge gap is the need to understand how to remove allergens effectively, particularly in catering settings. In 2008, the Anaphylaxis Campaign worked with RSSL on a short study looking at washing up, dishwashing and surface cleaning of everyday catering equipment deliberately contaminated by reference material milk, peanut and hazelnut. This study was never formally published or disseminated. Caterers would be reassured to know more about how to remove allergens effectively. Further studies are urgently required, taking into account different food matrices – powders, grains, fats etc as well as temperature, cleaning methods. This would enhance consistency and confidence for businesses and consumers at risk.”

Dr Hazel Gowland, Allergy Action, consultation response.

“[For the industry as a whole] cleaning guidance is needed, particularly on the difference between validation and verification and how to ensure the clean has removed the allergens.”

Pret, consultation response

Additionally, the global nature of supply chains, and complexity of the food production system, was also seen as a barrier to creating a one size, fits all approach.

“It is really challenging because of our global supply chain. Some countries don't recognize certain allergens, and others don't understand their seriousness and importance.”

Manufacturer, stakeholder workshops.

“We do not believe that the Government should take a standardised approach to all information regarding the risk of allergen cross-contamination within supply chains. Consideration needs to be given to the size and structure of supply chains. For instance, while this might be easier for manufacturing sites, our business has large and complex supply chains, each element of which carries very different

risks that make the standardisation less practical. For example, the risk within our supplier sites differs significantly from the third-party couriers who operate at the end of our supply chain”.

McDonalds, consultation response.

Overall, and despite all the caveats noted above, greater standardisation of allergen information, risk analysis and testing methodologies was welcomed by stakeholders. While undoubtably challenging, more consistency across the sector would be a significant step forward to support the more effective use of PAL. In terms of format, while common digital templates were seen as helpful, the system should be flexible and accommodate other formats as required. The need to tailor information requirements by sector and business size was also underscored in written responses to the consultation.

“Information would be more effectively shared through appropriate guidance and training for businesses, that is clear, concise, and tailored to their business sector... [It should] include practical case studies and flow charts.”

Federation of Small Businesses, consultation response.

## **Establishing thresholds**

A threshold dose for a food allergen refers to the limit below which no allergic reaction is triggered. Thresholds for the allergic population can be established based on data from individuals participating in oral food challenges.

Establishing standard thresholds constitutes a critical first step to assessing the risk from allergen cross-contact and ensures a certain percentage of the food hypersensitive population is protected.

Stakeholders, together with those feeding back through the consultation, supported the idea that PAL should be tied to a reference dose for each allergen. Establishing thresholds was perceived to help build consumer confidence, as the application of PAL would be linked to a quantified risk of harm – addressing the ambiguity of a ‘may contain’ label. Depending on the threshold level, it could also reduce the overuse of PAL and increase consumer choice.

For example, regular testing of allergen levels creates greater certainty, which may reduce PAL use by businesses that currently do not test. Additionally, for businesses that

do currently test, thresholds would ensure greater consistency across the sector and would reduce the use of PAL, should thresholds be set above those within the Voluntary Incidental Trace Allergen Labelling (VITAL) risk assessment process – an international standard with conservative reference doses.

Stakeholders across a range of sectors viewed setting thresholds as complex due to effects from food processing, variations in allergenicity, and different sensitivities across the population.

“Thresholds would provide businesses with clarity on when to apply PAL, and also give consumers confidence that labels were being applied on the basis of levels underpinned by evidence that will be consistent across products. However, it is important these standard levels account for processing effects, for example the effect of baking/heat degradation, as well as any differences in allergenicity for the same allergen (for example soya milk versus soya flour).”

Food business, consultation response.

“I don't think we have the evidence currently to say for all 14 allergens that we know what those thresholds are absolutely. To give a legislator confidence that, when they set that level, they are not going to harm a proportion of the population with allergies.”

Manufacturer, stakeholder workshops.

“Setting standards for allergen levels of precautionary allergen labelling for prepacked foods, would not be straightforward. For example, whilst food factories may have the facilities to test for the amount of an allergen present, other food businesses are unlikely to be able to test for this or have the resources to. Testing for allergens is also not always an exact science either, for example a test may say that an allergen is present but not at what level”

Local Authority Food Officer, consultation response.

Despite these concerns, it was noted that large manufacturing and retail businesses routinely work to standards and establishing common reference doses was better than allowing flexible thresholds (albeit informed by international guidelines) across the sector.

There was consensus that thresholds need to be set by the FSA and internationally harmonised. Learning from other countries, for instance the from the roll out of the VITAL standard for the food industry in Australia and New Zealand, was cited by a range of stakeholders as instructive. Ideally, thresholds would be set for all 14 allergens – though this was acknowledged to be challenging in practice.

The unintended consequences of setting thresholds were also raised by a certain number of consumer advocacy groups, institutions, and caterers. Specifically, thresholds may give a “false sense of security” and expose FHS consumers to unnecessary risks, not least given the variable nature of allergy tolerance amongst individuals. The liability for businesses was also a concern in this context.

“I don’t think anybody wants to have a reaction. Reactions can vary in severity. Once we get into thresholds and consumers asking themselves ‘is this something I can tolerate or something I cannot tolerate’ I feel we are getting into very dangerous ground. You can’t open up choice if there is a risk”.

Consumer advocacy group, stakeholder workshops.

“In practice there are different tolerance levels for consumers for any given allergen amount, giving rise to issues of liability we need to consider. What if a company is below the threshold, and no PAL is used, but someone has adverse or even fatal reaction?”

Institution, stakeholder workshops.

“Thresholds will not reduce PAL unless we set a high limit [exposing people to risk]. These would also be very expensive to conduct for the catering industry. Thresholds will vary for allergenic individuals so not sure setting a limit will assist”

Caterer, consultation response.

If thresholds are established, it was suggested by consumer advocacy groups that risk assessment become mandatory and that PAL statements communicating the risk should focus on avoidance (for example, not suitable for), rather than choice (for example, may contain). Currently the voluntary nature of PAL undermines the system, as the absence of a label was likely to be associated with a safe product.

A trade body also noted that the FAO/WHO recommended providing a symbol to indicate whether a risk assessment has been completed.

## **Incorporating PAL into a food safety management system**

A food safety management system (FSMS) is a systematic approach to controlling food safety hazards to ensure that food is safe to eat. It includes communication across the supply chain, and approaches to determine the critical control points or steps in the process to address a food safety hazard. As part of a FSMS, Hazard Analysis and Critical Control Point (HACCP) plans are used by food businesses and focus on microbiological, chemical and physical food safety risks. Cross-contact risks from allergens are less commonly considered as part of HACCP.

Stakeholders generally supported the principle of integrating PAL as part of a FSMS.

It was positively received by academics, most retailers and institutions, and certain manufacturing and catering stakeholders. It was seen as a simple and sensible way of embedding good practice into an existing system, and particularly to support smaller businesses better adopt common standards. These views were also echoed in the consultation, including from public respondents.

“This is what we expect our supply chain to do anyway”.

Retailer, stakeholder workshops.

“Keep it as simple as possible. If there are already mechanisms in use, don’t complicate it”.

Institution, stakeholder workshops.

“Allergen risk management is an integral part of food safety management and should be integrated into a unit FSMS or HACCP management plan rather than having it separate. The industry must change the mindset, and view allergen management as standard food safety.”

Academics and clinicians, stakeholder workshops.

“Allergen risk management cannot be effective if separated from overall food safety risk management. They must be integrated into overall food safety management systems and embedded into food safety culture”

Public, consultation response

However, despite the broad support, there were several caveats when integrating PAL into a FSMS raised in both the stakeholder workshops and consultation open responses:

- the potential breadth of critical control points becoming unworkable.
- the complexity of managing cross-contact risks in an open kitchen.
- whether any integration may affect the food hygiene rating of a business.

The idea also has received a mixed reception from those involved in enforcement and compliance. Concerns were expressed over how a single system would work across sectors, the level of support SMEs would need to help integrate PAL into a FSMS, the complexity of assessing risks, and the associated resources needed for an inspection. There was also ambiguity surrounding where responsibility sat for this process, between environmental health (who focus on food safety inspections) and trading standards (who focus on food labelling).

“This is already cross over with FSMS because allergens are part of HACCP hazard management and codex is part of SFBB allergy controls. But the issue is the difference between intentional ingredients and unintentional cross-contact and how far you can apply via HACCP in a PAL context. In a catering setting, to what extent can cross-contact be controlled for? And can you then comply with the obligation to serve safe food for a person presenting a risk of allergens?”

Enforcement and compliance, stakeholder workshops.

## Accreditation schemes

As with the consultation findings, there was limited support for an accreditation scheme across food businesses and Local Authority Food Officers involved in the workshops. There were a range of barriers to accreditation including:



- the growing plethora of ratings and accreditations in the food industry, each with associated costs
- how an allergen accreditation would fit with the 5-star food hygiene rating system and the potential to send confusing messages to consumers
- the requirement for further audits
- the turnover of staff (particularly in catering businesses), meaning any accreditation would quickly become out of date
- the limited resources to implement this within local authorities

“If you're introducing yet another accreditation scheme, it's yet another burden, another cost for the food industry... we've already got many systems already there checking what we do”

Manufacturer, stakeholder workshops.

“We need to be careful here. I can imagine a scenario where a business gets a 5-star rating for PAL by virtue of a limited menu but has a poor food hygiene and safety rating”.

Caterer, stakeholder workshops.

“We have nowhere near the capacity to be able to do this. Unrealistic expectation considering the backlog on stop agreements. We can't even do the bare minimum for allergens”.

Local Authority Food Officer, stakeholder workshops.

It was suggested by a Local Authority Food Officer that an award, based on all staff completing FSA accredited training on allergies might be better system, and would give consumers greater confidence when having conversations about PAL.

## Outcomes

This consultation has enabled us to get a fuller picture of issues with how precautionary allergen labelling and information is provided and how that impacts upon consumer choice, safety, and trust, as well as what could be the best approaches for us to take with

stakeholders – including food business, trade, bodies, local authorities, allergy charities, and scientists – to address them.

There was consensus that precautionary allergen labelling and information should be communicated more clearly and consistently in an understandable and meaningful way and be based on proportionate and standardised processes for assessing, managing, and communicating the risk of allergen cross-contamination.

Food business size and sector were considered two key factors we should take into account when deciding upon any approach to support practices that meet and go beyond compliance, with an emphasis placed on the need for collaboration with trade bodies, as well as wider stakeholders.

There was agreement with our legal interpretations of the Food Information to Consumers Regulation in relation to the provision of precautionary allergen labels and information, but most stakeholders were also open to regulatory change, provided both trade within the UK and internationally was not impeded.

There was consensus that allergen thresholds need to be set to support the standardisation of risk analysis of allergen cross-contact for prepacked foods and that a PAL with standardised wording should be provided when set thresholds for allergens are exceeded.

There was significant support for improving and standardising allergen information within supply chains, so that all food businesses receive the precautionary allergen information they need, alongside the ingredients they source, to help enable any communication of allergen cross-contact risk to their customers to be as accurate as possible.

The catering sector was identified as facing particular challenges, with a need for a focus upon conversations staff have with customers to enable a safe meal to be prepared for them, as well as allergen cleaning guidance, so operators have confidence in this control measure.

## Next Steps

Working with stakeholders, we will use the information provided through this consultation and our social science research to develop a range of options which will enable food businesses to understand their responsibilities and the steps that they need to follow

prior to providing precautionary allergen labels and information, as well as giving consumers confidence that the information they are provided with is meaningful and can be trusted to keep them safe.

We have set out our early thinking in the Food Hypersensitivity update to be discussed at the June [FSA Board meeting](#).

# Appendix 1: Consultation Document

## Precautionary Allergen Labelling (PAL): The 'may contain' Consultation

Consultation on the provision of precautionary allergen labelling and precautionary allergen information, such as 'may contain' on many types of food sold in England, Northern Ireland, and Wales.

### Background information

We advise that you read the background information supplied by the Food Standards Agency on this webpage before completing the consultation. [Precautionary allergen labelling \(PAL\) 'may contain' consultation.](#)

### Respond online

You can respond to the consultation online: [PAL consultation online.](#)

**1. Please confirm that you have seen the background information to this consultation on the Food Standards Agency website. This is important because it provides the details you will need to know in order to respond to the questions in this consultation.**

Yes, I have seen the background information

No, I have not seen the background information

## Theme 1: Information Provision to Consumers

A recent study by the Food Standards Agency (FSA) found that many consumers were confused by precautionary allergen labelling statements on prepacked foods, for example, chocolate bars, biscuits and other products that are sold in supermarkets. This is because the wording of precautionary allergen labelling statements can differ between products, and consumers are unsure as to what they mean. Also, some precautionary allergen labelling statements can be hard to read due to the font size or style applied by the manufacturer.

Images 1 and 2 are examples of precautionary allergen labelling statements on products

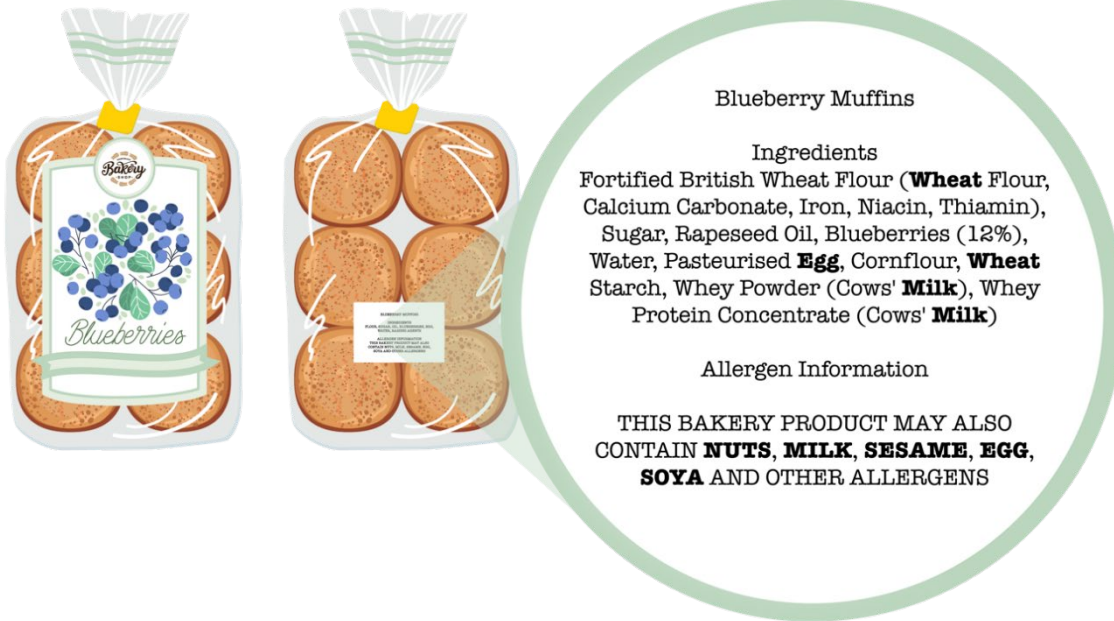


Image 1



Image 2

For non-prepacked foods - for example takeaway or meals served in a canteen - precautionary allergen information can be communicated verbally, or on a menu. But

there is a lack of agreement as to best practice and sometimes the risk of allergen cross-contamination may not be communicated at all.

The FSA is also aware that food businesses lack clarity on how to provide precautionary allergen labelling or precautionary allergen information, because no standards have been set.

## **Standardising precautionary allergen labelling on prepacked foods**

The FSA is considering whether there would be a benefit in developing standards on precautionary allergen labelling on prepacked foods and providing new guidance on wording, font, style, and location of a precautionary allergen labelling statement.

**2. Should precautionary allergen labelling statements follow a standardised format, so that the format and wording is consistent across all prepacked foods?**

Yes

No

Not sure

Here are a selection of the type of precautionary allergen labelling statements used by food businesses to explain that there is risk of allergens being unintentionally present in a food product, due to cross-contact that cannot be sufficiently controlled.

Images 3 and 4 are examples of precautionary allergen labelling statements



Image 3



Image 4

3. How effective is the statement ‘May contain [allergen]’ at explaining this risk?

Very effective

Somewhat effective

- Unsure
- Slightly effective
- Not effective at all

**4. How effective is the statement ‘Made/produced in a factory where [allergen] is used’ at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**5. How effective is the statement ‘May be present: [allergen]’ at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**5. How effective is the statement ‘Cannot be guaranteed to be [allergen] free’ at explaining this risk?**

- Very effective
- Somewhat effective



- Unsure
- Slightly effective
- Not effective at all

**7. How effective is the statement 'Not suitable for those with an allergy to [allergen]' at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**8. To better communicate the risk that an allergen may be unintentionally incorporated into another food the terms 'cross-contamination' or 'cross-contact' could be used. Which phrase most clearly describes this risk?**

- Cross-contamination
- Cross-contact
- Neither
- Unsure
- Other (please specify)

The FSA is considering exploring new guidance around whether precautionary allergen labelling statements should also include phrases such as 'cross-contamination' or 'cross-contact'.

By adding these new statements to the range of precautionary allergen labelling statements that are already in use - how effective would the following statements be at explaining this risk?

**9. How effective is the statement 'May contain [allergen] due to risk of cross-contamination' at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**10. How effective is the statement 'Risk of cross-contamination, as made/produced in a factory where [allergen] is used' at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**11. How effective is the statement 'May be present due to cross-contamination: [allergen]' at explaining this risk?**

- Very effective
- Somewhat effective

- Unsure
- Slightly effective
- Not effective at all

**12. How effective is the statement 'Cannot be guaranteed to be [allergen] free due to cross-contamination' at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**13. How effective is the statement 'Not suitable for those with an allergy to [allergen] due to cross-contamination' at explaining this risk?**

- Very effective
- Somewhat effective
- Unsure
- Slightly effective
- Not effective at all

**14. If a product does not have a precautionary allergen labelling statement how do you think a consumer with a food hypersensitivity would interpret this?**

- The product is safe to consume
- The product is unsafe to consume

A consumer would not know whether the product is safe to consume

I am not sure how a consumer would interpret this

In addition to the wording of precautionary allergen labelling statements, the FSA is considering the benefit of developing standards on how the information is displayed on a label (for example, text font size, font style, location on the packaging) to increase clarity for the consumer. For example, mandatory allergen declarations on labels are required to have a text font with minimum character height of 1.2 mm.

Images 5 and 6 are examples of text font size



Image 5

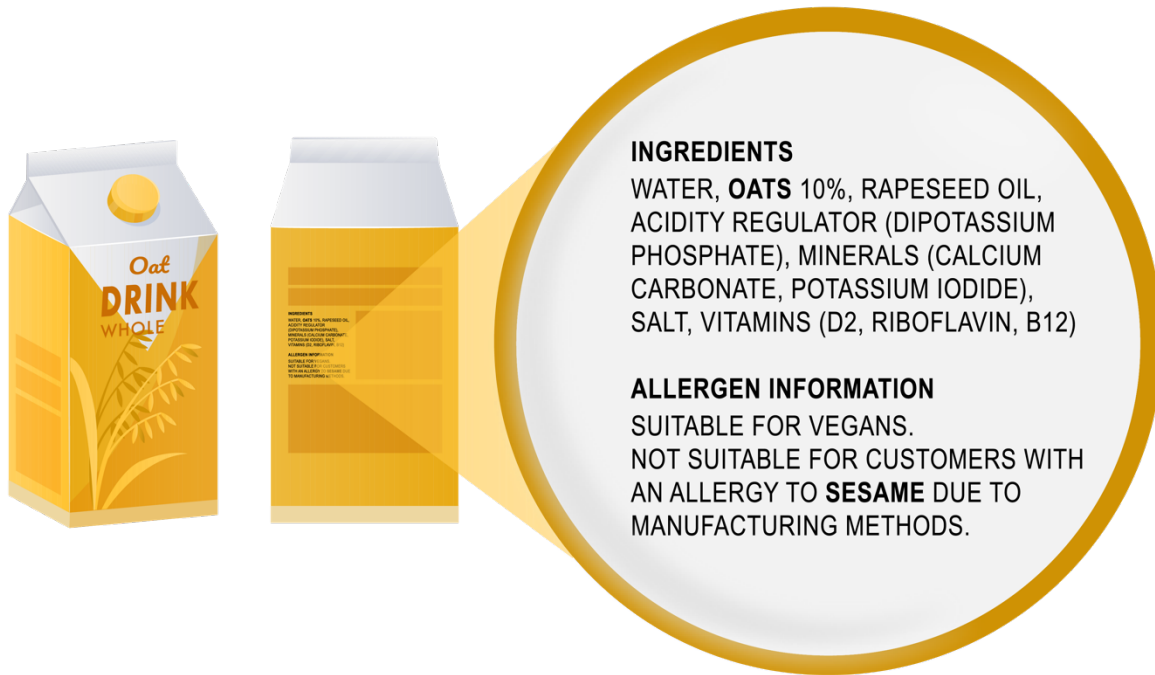


Image 6

**15. Should text font size be standardised on precautionary allergen labelling to increase clarity?**

- Yes
- No
- Not sure

Images 7 and 8 are examples of text font style



16. Should text font style be standardised on precautionary allergen labelling to increase clarity?

- Yes
- No
- Not sure

Images 9 and 10 are examples of text being highlighted



Image 9



Image 10

**17. Should text being highlighted for emphasis be standardised on precautionary allergen labelling to increase clarity?**

- Yes
- No
- Not sure

Images 11 and 12 are examples of where a PAL is located





### Blueberry Muffins

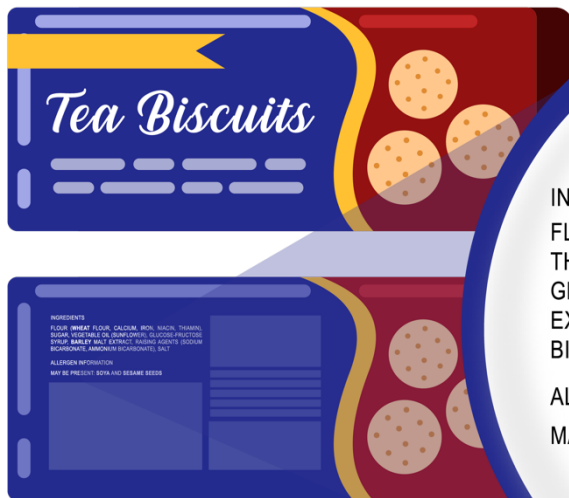
#### Ingredients

Fortified British Wheat Flour (**Wheat** Flour, Calcium Carbonate, Iron, Niacin, Thiamin), Sugar, Rapeseed Oil, Blueberries (12%), Water, Pasteurised **Egg**, Cornflour, **Wheat** Starch, Whey Powder (Cows' **Milk**), Whey Protein Concentrate (Cows' **Milk**)

#### Allergen Information

THIS BAKERY PRODUCT MAY ALSO CONTAIN **NUTS, MILK, SESAME, EGG, SOYA** AND OTHER ALLERGENS

Image 11



#### INGREDIENTS

FLOUR (**WHEAT** FLOUR, CALCIUM, IRON, NIACIN, THIAMIN), SUGAR, VEGETABLE OIL (SUNFLOWER), GLUCOSE-FRUCTOSE SYRUP, **BARLEY** MALT EXTRACT, RAISING AGENTS (SODIUM BICARBONATE, AMMONIUM BICARBONATE), SALT

#### ALLERGEN INFORMATION

MAY BE PRESENT: **SOYA** AND **SESAME SEEDS**

Image 12

18. Should where a precautionary allergen label is located on the packaging be standardised to increase clarity?

Yes

No

Not sure

## **Providing Further Information on Potential Unintentional Presence of Allergens with Prepacked Foods**

Recent research suggests that the level of information on precautionary allergen labels may be insufficient to enable consumers to make informed decisions on whether they want to consume a 'prepacked' food (for example, chocolate bars, biscuits and other products that are sold in supermarkets).

Our research shows consumers, particularly those with severe or multiple allergies, want more information about why the precautionary allergen label was applied. For example, describing how allergen cross-contact might happen and what controls the business has put in place to minimise this risk. Consumers sometimes contact food businesses directly, asking for this information about their products.

If food businesses provided further information about how they assess and manage the risk of allergen cross-contact, this could provide the following benefits to the consumer:

- Consumers could understand the reason for the use of precautionary allergen labelling on a product
- Consumers may be more likely to trust and have confidence in precautionary allergen labelling as a tool to inform and protect them
- Consumers could understand how cross-contact could happen

A benefit to food businesses that provide further information on precautionary allergen labelling is that they would be able to demonstrate to consumers that they have taken the appropriate care and consideration when applying precautionary allergen labelling to a product.

However, information would not inform the consumer on the likelihood of an allergen being present or at what level.

**19. Do you agree that further information should be provided on why precautionary allergen labelling has been used on a product?**

Yes

No

Don't know

The FSA is exploring whether a two-tiered approach for precautionary allergen labelling would help address the problems identified by consumers. This two-tiered approach would appear on product labels with text such as the following:

- TIER 1: Not suitable for (where no further information has been provided by a food business)
- TIER 2: Possible allergen cross-contamination / cross-contact (where further information has been provided by a food business)

**20. Would a two-tiered approach (as described above) for precautionary allergen labelling be helpful in providing consumers with more information?**

Yes

No

Don't know

Food labels are restricted in size and some of this further information would be too detailed to put on the label. The FSA is considering how this information could be made available to consumers. For example, it could be placed on a business's website, published in a booklet, or accessed via a QR code.

Here are some examples of the kind of further information food businesses could provide on precautionary allergen labelling:

### Example 1

Allergen that could have been unintentionally incorporated within this food: Milk

How could this cross-contamination happen?: Milk chocolate can contaminate dark chocolate when the lines are changed in the chocolate factory

Actions taken by the company to reduce this risk: None – the food business has carried out a risk assessment and concluded the risk cannot be reduced

Findings of the company's risk assessment: There is an unavoidable risk that milk could unintentionally be present in the product and cause a reaction in consumers who are allergic to milk

### Example 2

Allergen that could have been unintentionally incorporated within this food: Peanuts

How could this cross-contamination happen?: Peanuts are an ingredient present within the factory  
Actions taken by the company to reduce this risk:

- Cleaning of lines between batches
- Ventilation to reduce spread of airborne particulates

Findings of the company's risk assessment: Despite the actions taken by the company, there is an unavoidable risk that peanuts could unintentionally be present in the product and cause a reaction in consumers who are allergic to peanuts

### 21. Which of these types of further information should be provided (if any)? (Please tick all that apply)

- The allergen that could have been unintentionally incorporated within this food
- How this cross-contamination could happen
- Actions taken by the company to reduce this risk

The risk that remains following any actions taken (for example, “Whilst this product does not contain milk as an ingredient there is a risk it could be present due to cross-contamination within the factory that controls do not fully mitigate”)

None

Other (please specify)

## **Standardising precautionary allergen information provided with non-prepacked food**

‘Non-prepacked’ foods include ‘loose foods’ (for example, foods that would be made to order in a restaurant) and foods that are ‘prepacked for direct sale’ (for example, foods that are made, packaged, labelled and sold on the same premises). You might purchase these foods in a catering setting, such as a sandwich shop, café, or restaurant.

Feedback from consumers is that they can have mixed experiences when eating out, because there is also a lack of standardisation in how precautionary allergen information is currently provided to them. For example, information can be provided on a menu, verbally by staff, or on a sign on the premises.

The FSA is considering developing standard checklists to communicate the steps that have been taken to manage allergen-cross contamination on the premises. This standard information could be used in a catering setting (such as a café or restaurant) on menus, chalkboards, signs or when delivered verbally by staff, as well as the specific precautionary allergen information relating to the food ordered and the customers allergy requirements.

**22. In a catering setting, how well does the statement, ‘All staff involved with preparing the meal of a customer will be made aware of the customer’s allergen requirements’ communicate that allergen cross-contamination is being managed effectively?**

Communicates this very well

- Partially communicates this
- Unsure
- Communicates this a little
- Does not communicate this at all

**23. In a catering setting, how well does the statement, 'All staff are trained on allergens and food hypersensitivity and we regularly check in on staff practice' communicate that allergen cross- contamination is being managed effectively?**

- Communicates this very well
- Partially communicates this
- Unsure
- Communicates this a little
- Does not communicate this at all

**24. In a catering setting, how well does the statement, 'Allergenic ingredients and foods are stored separately on the premises and labelled clearly' communicate that allergen cross-contamination is being managed effectively?**

- Communicates this very well
- Partially communicates this
- Unsure
- Communicates this a little
- Does not communicate this at all

**25. In a catering setting, how well does the statement, 'Separate utensils and equipment (for example, spatulas, trays, cutting boards) are used for customers with a food allergy' communicate that allergen cross-contamination is being managed effectively?**

- Communicates this very well
- Partially communicates this
- Unsure
- Communicates this a little
- Does not communicate this at all

**26. In a catering setting, how well does the statement, 'Allergenic foods for other people at your table will be labelled to avoid confusion' communicate that allergen cross-contamination is being managed effectively?**

- Communicates this very well
- Partially communicates this
- Unsure
- Communicates this a little
- Does not communicate this at all

**27. In a catering setting, how well does the statement, 'Where possible, foods are prepared in order of least allergenic to most allergenic to manage cross-contamination' communicate that allergen cross-contamination is being managed effectively?**

- Communicates this very well
- Partially communicates this

Unsure

Communicates this a little

Does not communicate this at all

**28. In a catering setting, how well does the statement, 'We welcome feedback from customers about how well we've met your allergen needs. Please contact [XXX]' communicate that allergen cross- contamination is being managed effectively?**

Communicates this very well

Partially communicates this

Unsure

Communicates this a little

Does not communicate this at all

**29. We have shown you some ideas that the FSA is considering around the provision of further information on precautionary allergen labelling. Do you have any additional comments you would like to be noted? (100 words maximum)**



## Theme 2: Ensuring Compliance

Currently there is no legislation around precautionary allergen labelling. The FSA thinks it is important that the purpose for its application is clear.

**30. Do you think a precautionary allergen label (or precautionary allergen information) should only be applied when there is an unavoidable risk of allergen cross-contamination that cannot be sufficiently controlled?**

- Yes
- No – it can serve other purposes
- Unsure

The FSA has set 3 key voluntary standards for how precautionary allergen labelling should be applied if a food business decides to use it. These include:

1. A precautionary allergen label should only be applied where an unavoidable risk of the unintended presence of allergens within a food has been identified
2. Precautionary allergen labelling statements should make specific reference to one or more of the 14 allergens regulated by UK food law that could be unintentionally present in the food due to unavoidable cross-contact
3. Precautionary allergen labelling should not be used in combination with a 'free-from' statement for the same allergen

If food businesses do not meet these standards they may have breached the Food Information to Consumers (FIC) regulation. This regulation covers the labelling of general, nutritional, and voluntary food information.

**31. Do you agree or disagree with the following key standard from the FSA - Precautionary allergen labelling may be misleading food information if it is applied without first assessing whether there is an unavoidable risk of allergen cross-contamination that cannot be sufficiently controlled?**

- Agree

Disagree

Image 13 is an example of a 'may contain allergens' statement



Image 13

32. Do you agree or disagree with the following key standard from the FSA - A precautionary allergen labelling statement that does not specify individual allergens may be misleading (for example, 'may contain allergens', or 'may contain nuts' without specifying whether individual tree nuts or peanuts)?

Agree

Disagree

Image 14 is an example of PAL used in conjunction with a 'free-from' claim for the same allergen



...CH, TRICALC  
 ...GUM), ACIDITY REGULAT  
 ... FLOUR: CAROTENE), YEAST FE  
 ... GROUND WHITE PEPPER, GROUND  
 ... SHEETS (11%) [GLUTEN FREE FLOUR  
 ... METABISULPHITE, RICE FLOUR, PEA P  
 ... HYDROXYPROPYLMETHYL CELLULOSE  
 ... XANTHAN GUM, PSYLLIUM HUSK), WATE

**ALLERGEN INFORMATION**  
**FREE FROM: 14 ALLERGENS**  
**MAY CONTAIN: ALMONDS AND MILK**

Image 14

33. Do you agree or disagree with the following key standard from the FSA - A precautionary allergen label applied in conjunction with a 'free-from' claim for the same allergen may be misleading?

- Agree
- Disagree

Information could be included within the Food Information for Consumers Regulation on how precautionary allergen labelling needs to be applied (for example, a specific article stating that precautionary allergen labelling must refer to specific allergens).

**34. Do you think that amendments to the Food Information for Consumers Regulation are needed to provide clarity on the legal requirements for the application of precautionary allergen labels?**

Yes

No

Unsure

**35. We have asked you some questions around compliance with precautionary allergen labelling. Do you have any additional comments you would like to be noted? (100 words maximum)**

## **Advice and guidance for food businesses and risk analysis of allergen cross-contamination**

The next two sections asks questions relating to:

- advice and guidance for food businesses, and
- risk analysis of allergen cross-contamination within food supply chains

Some of the questions may seem very technical unless you are familiar with the areas.

**36. Would you like to answer questions on advice and guidance for food businesses, and risk analysis of allergen cross-contamination within food supply chains?**

Yes

No (you can go straight to question 54 - the “Your big ideas” section)

### Theme 3: Advice and Training

The FSA appreciates that it is not easy for food businesses to decide whether to apply precautionary allergen labelling on food products.

Currently, there are sources of advice on the FSA website (food.gov.uk) to help support businesses in applying precautionary allergen labelling and how to provide precautionary allergen information to consumers, including:

Food allergy and intolerance online training - this includes a module on the use of voluntary precautionary allergen labelling FSA precautionary allergen labelling guidance for small and medium sized food businesses with accompanying checklist Technical Guidance on food allergen labelling and information requirements

We would like to understand whether current advice and training provided to food businesses is adequate, or whether further support is needed.

#### **37. Are you aware of FSA food allergy and intolerance online training?**

Aware

Not aware

#### **38. Are you aware of FSA precautionary allergen labelling guidance for small and medium food businesses with accompanying checklist?**

Aware

Not aware

#### **39. Are you aware of FSA technical guidance for detailed technical information currently provided by the FSA?**

Aware

Not aware

The FSA has also produced additional precautionary allergen labelling guidance, particularly aimed at smaller businesses. This guidance contains the following:

## The 4-step process of risk analysis

### Risk analysis for allergen cross-contamination

Undertaking a risk analysis will allow your business to identify the risk of allergen cross-contamination, decide whether precautionary allergen labelling is appropriate, and agree next steps. This risk analysis process involves four stages:

1. Risk assessment – What is the risk?
2. Risk management – Can the risk be managed? What actions could reduce the risk?
3. Risk communication – How should the risk be communicated?
4. Risk review – Has the risk changed? How frequently will you review your system?

**40. Are you aware of the guidance on the 4-step process of risk analysis for cross-contamination (above)?**

Yes

No

**41. How useful is this guidance in helping food businesses manage allergen cross-contamination?**

Very useful

Somewhat useful

Unsure

Not very useful

Not useful at all

This new guidance on precautionary allergen labelling also contains the following:

**The 8-point checklist on precautionary allergen labelling**

1. Identify potential sources of allergens
2. Identify points of allergen cross-contamination
3. Remove or substitute allergens
4. Separate allergens
5. Clean points of allergen cross-contamination
6. When to apply PAL
7. How to apply PAL
8. Review

**42. Are you aware of the 8-point checklist on precautionary allergen labelling?**

Yes

No

**43. How useful is this guidance in helping food businesses to manage allergen cross-contamination?**

Very useful

Somewhat useful

Unsure

Not very useful

Not useful at all

**44. Are you aware of other sources of information relating to precautionary allergen labelling?**

- No
- Yes (please name them)

**45. To what extent do you agree that the advice and guidance currently available to businesses is adequate to enable them to apply precautionary allergen labelling appropriately?**

- Strongly agree
- Agree
- Don't know
- Disagree
- Strongly disagree

**46. Do you think that any of the following advice and guidance should be required in relation to precautionary allergen labelling? (Please tick all that apply)**

- Food sector-based guidance - for example, catering, retail etc.
- Precautionary allergen labelling checklists relevant to specific business sectors - for example, for cheesemakers or restaurants
- Case studies showing real-life examples of food businesses following precautionary allergen labelling best practice
- Online training for businesses on how to apply precautionary allergen labelling
- In-person training on how to apply precautionary allergen labelling
- Specific guidance on the effectiveness of cleaning to remove or minimise allergen cross-contamination



**47. We have shown some ideas that the FSA is considering around advice and guidance on precautionary allergen labelling. Do you have any additional comments you would like to be noted about this? (100 words maximum)**

#### **Theme 4: Standards for Risk Analysis of Allergen Cross-Contact**

There is a lack of standards for the risk analysis of allergen cross-contact within food supply chains. Recent research for the FSA found that food businesses take very different approaches to assess and control risk before applying precautionary allergen labelling, and that standardisation around the application of precautionary allergen labelling is needed.

A Hazard Analysis and Critical Control Point (HACCP) is a way of managing food safety hazards. A Food Safety Management System (FSMS) is a systematic approach to controlling food safety hazards within a food business in order to ensure that food is safe to eat. Food safety management procedures should be based on HACCP principles.

**48. Should precautionary allergen labelling be incorporated as part of a Food Safety Management System (FSMS), or considered as a separate process?**

- Incorporated as part of a FSMS
- A separate process for precautionary allergen labelling
- Don't know

**49. Should there be a requirement for businesses to make their allergen risk-assessment and management processes available to the public?**

- Yes
- No
- Unsure

Food businesses have told us that they find it challenging to decide whether to apply a precautionary allergen label because the allergen information they receive from their suppliers is insufficient. There is currently no standardised format for the provision of information relating to allergen cross-contamination from suppliers.

**50. Should information regarding the risk of allergen cross-contamination within supply chains be standardised?**

- Yes
- No
- Don't know

**51. Would a new accreditation scheme be a good way to ensure standards for allergen risk analysis?  Yes**

- No
- Don't know

Currently there are no set levels for allergens found in a final food product that can be used to guide the application of precautionary allergen labelling. Due to this, food businesses that test for allergen levels in a final food product do not have clarity on whether to apply a PAL or not.

**52. Should a standard be set for allergen levels to guide the application of precautionary allergen labelling for prepacked foods?**

- Yes
- No
- Don't know

**53. We have asked you questions around the standards for risk analysis of allergen cross-contamination. Do you have any additional comments you would like to be noted about this topic? (100 words maximum)**

## **Your Big Ideas**

**54. In 250 words or less, please propose your own suggested approaches on precautionary allergen labelling that have not previously been referred to here. We welcome any other views or alternative approaches.**

## **Demographic Questions**

### **Respondent Type**

**55. Which of the following best describes how you are responding to this consultation?**

On behalf of a business or organisation (go to question 56 and complete the “About your business or organisation” section)

Member of the public / consumer Scientist or academic (go to question 65 and complete the “About you” section)

Clinical professional (go to question 56 and complete the “About your business or organisation” section)

Local authority food officer (go to question 56 and complete the “About your business or organisation” section)

### **About your business or organisation**

**56. What is the name of your business or organisation?**

**57. Is this the official response from your organisation or business?**

- Yes
- No, I am responding in a personal capacity

**58. Which of the following describe the organisation or business you are responding on behalf of? (Please tick all that apply)**

- Manufacturing business (including all types of manufacturing in a food factory) Retail business
- Wholesale business
- Transportation of food business
- Primary producer business (for example, agriculture)
- Catering business
- Institution (for example, hospital, care home, school/college) Compliance and enforcement (for example, Local Authority, Solicitors) Health organisation
- Science or academic institution Charity or third sector organisation Trade body
- Other (please specify)

**59. Which best describes how food is packaged in your business? (Please tick all that apply)**

- Prepacked for Direct Sale (PPDS)
- Non-prepacked (loose) Prepacked
- Other

**60. Do you provide training and support or advice on the following for your staff or members?**

- Both food hygiene and allergens
- Food hygiene only
- Allergens only
- None of the above

**61. Is your training on food hygiene and allergens provided separately in different courses or together in the same course?**

- As separate courses
- Together in a single course

**62. What is the size of your business or organisation?**

- Large: with 250 or more employees
- Medium-sized: with 50 to 249 employees
- Ordinary partnership: run by two or more self-employed people
- Small: with 0 to 49 employees

**63. Does your business currently apply precautionary allergen labelling? For example, 'May contain...' or 'Packed in a factory where...'**

- Yes
- No
- Not sure

**64. Which countries and regions does your organisation cover? (Please tick all that apply)**

- Wales
- Northern Ireland
- North East England
- North West England Yorkshire and the Humber East Midlands
- West Midlands
- East of England
- London
- South East England
- South West England
- Prefer not to say

If you are responding on behalf of a business or organisation, or as a local authority enforcement officer, scientist, academic or clinical professional, then you do not have to complete the following “About you” section and have finished your response.

### **About you**

**65. Do you have, or do you care for someone with a food hypersensitivity (allergy, intolerance or coeliac disease) relating to any of the following allergens? (Please tick all that apply)**

- Celery
- Cereals containing gluten (such as barley and oats)
- Crustaceans (such as prawns, crabs, and lobsters)

- Egg
- Fish
- Lupin
- Milk
- Molluscs (such as mussels and oysters)
- Mustard
- Peanuts
- Sesame
- Soybeans
- Sulphur dioxide and sulphites
- Tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios, and macadamia nuts) I do not have, nor do I care for someone with, a food hypersensitivity

**66. What is your sex?**

- Female
- Male
- Prefer not to say

**67. Is the gender you identify with the same as your sex registered at birth?**

- Yes
- No
- Prefer not to say

**68. What is your age?**

- Under 16
- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85+
- Prefer not to say

**69. What is your ethnic group?**

- White (go to question 70)
- Mixed or multiple ethnic groups (go to question 71)
- Asian or Asian British (go to question 72)
- Black, African, Caribbean or Black British (go to question 73)
- Other ethnic group (go to question 74)
- Prefer not to say (go to question 75)

**70. Which of the following best describes your White background?**

- English, Welsh, Scottish, Northern Irish or British



- Irish
- Gypsy or Irish Traveller Roma
- Any other White background
- Prefer not to say

**71. Which of the following best describes your Mixed or Multiple ethnic groups background?**

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed or Multiple background
- Prefer not to say

**72. Which of the following best describes your Asian or Asian British background?**

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background
- Prefer not to say

**73. Which of the following best describes your Black, African, Caribbean or Black British background?**

- Caribbean
- African background
- Any other Black, Black British or Caribbean background
- Prefer not to say

**74. Which of the following best describes your background?**

- Arab
- Any other ethnic group
- Prefer not to say

**75. What is your main language?**

- English
- Other (please specify)

**76. Which country do you live in?**

- England (go to question 77)
- Wales (go to question 78)
- Northern Ireland (go to question 78)
- Prefer not to say (go to question 78)

**77. Which region of England do you live in?**

- North East

- North West
- Yorkshire and the Humber East Midlands
- West Midlands
- East of England
- London
- South East
- South West
- Prefer not to say

**78. Do you have any educational qualifications for which you received a certificate?**

- Yes (go to question 80)
- No (go to question 79)
- Prefer not to say (go to question 81)

**79. Do you have any professional, vocational or other work-related qualifications for which you received a certificate?**

- Yes (go to question 81)
- No (go to question 81)
- Prefer not to say (go to question 81)

**80. Was your highest qualification?**

At degree level or above

Another kind of qualification

Prefer not to say

**81. In the last seven days, were you doing any of the following? Include casual or temporary work even if only for one hour**

- Working as an employee
- Self-employed or freelance
- Temporarily away from work ill, on holiday or temporarily laid off On maternity or paternity leave
- Doing any other kind of paid work
- Retired
- Studying
- Looking after home or family
- Long term sick or disabled
- Other
- Prefer not to say

Thank you for your response.

## Appendix 2: List of respondents - Consultation

Businesses and organisations responding to the consultation survey were given the opportunity to either provide their details or to respond anonymously. Members of the public responded to the consultation anonymously. Those businesses and organisations that responded to the consultation and provided their details are listed below in alphabetical order. Those names highlighted in bold are where the respondent has indicated that their response was the official response from that organisation.

A F Blakemore

**AB world foods**

**Abersoch Deli limited**

**Afternoon tea**

Aldi Stores Ltd

**Allergen Accreditation (Operational name of Food Service Allergen Management Ltd.)**

**Allergen Bureau**

**Allergen Consultancy**

Allergy Action

**Allergy UK**

**Alliance Pharmaceuticals Ltd**

Alternative foods London Ltd

**Anaphylaxis Campaign**

Anil Ghelani Asian Languages

Apetito Ltd

**Appleby Westward**

Armagh Banbridge Craigavon Borough Council

**Asda**

**AYMES International Ltd**

**Banc restaurant**

Barts Health NHS Trust

**Bidfood**

Birmingham City Council

Blaby district council

Boparan Restaurant Group

Bradfield College

**Branston Potatoes**

**Brighton & Hove City Council**

British Airways

**British Beer & Pub Association (BBPA)**

**British Food Allergy Awareness**

**British Independent Retailers Association**

**British Retail Consortium (BRC)**

**British Sandwich & Food to Go Association**

**British Soft Drinks Association**

**Bromley High School**

**Buckfast Organic Bakery Ltd**

Caerphilly CBC

**Cakes by Harry**

Campden BRI

Carmans (Australia)

Carnival Maritime

Carol Walker Technical Services Ltd

**Carole Stewart Consulting**

**Carron fish bar**

Castell Howell foods

**Caterpillar catering Ltd**

Chartwells

chs hygiene and safety ltd

**Chilled Food Association**

**Chocolate Moments Ltd**

**Chunkys Ice Cream**

City of London Corporation

City of Stoke on Trent Trading Standards Service

Civica

Coeliac society

**Coeliac UK**

**Compass Group**

**Cornwall Council**

**Costa Ltd**

Cottage Delight Ltd

**Council for Responsible Nutrition UK (CRN UK)**

Country Choice Foods

**CTSI - Chartered Trading Standards Institute**

**Dairy UK**

**Daisy & Belle Ice Cream**

Danone UKI

Dawn meats

**Debare Limited**

Devon County Council

**Domino's Pizza Group UK & ROI**

**Double 7 Training**

**Dudes Foods**

Durham County Council

e-foods ltd

East Lancashire nhs trust

**East Of England Trading Standards Association**

**East park chippy**

East Riding of Yorkshire Council

**Emily's Eatery**

**Erudus Ltd**

**Essex County Council**



**F Duerr & Sons Limited**

**FERMANAGH & OMAGH DISTRICT COUNCIL**

**Fiddlers Elbow Fish & Chips**

**Fishnets**

**FLC**

Food Allergy Aware

**Food and Drink Federation**

FoodsMatter

Freelance Dietitian

gategroup

**Givaudan**

**GlaxoSmithKline Consumer Healthcare (UK) Trading Limited, Brentford, TW8 9GS,  
U.K.**

**Gloucestershire County Council Trading Standards Service**

Gluten Free Industry Association (part of the FDF - I am the Chair)

**Gluten Free Ireland Limited**

Govindas Ltd

Graze (Nature Delivered)

Greencore PLC

**Greggs**

Gressingham Foods

Griffith Foods

**GS1 UK**

**H.J.Heinz Foods UK Ltd.**

HCL

Heart of the SW Trading Standards

Heart of Worcestershire College Cafes

**Henderson Group**

**Homefree, LLC**

**Humdinger Ltd**

Hunters Grill Mobile Catering BBQ & HOG Roast

I2FAST

InBio

**Indie Northants**

**innocent drinks**

**Institute of Food Science and Technology**

**itsu [grocery]**

**JACS LTD**

**just love food co ltd**

K,Äôs Wors Ltd

Kache Food Systems

KC Chefs Ltd

Kellogg

KFC UK&I

Kids Planet Day Nurseries Ltd

King Asia Foods

**Kits Kitchen Ltd**

**Knead Bakery**

Lancashire County Council

Lancashire NHS foundation trust

Lancaster City Council

Lantmannen Unibake UK

Leeds Teaching Hospitals NHS Trust

**Leicester City Council**

**Leon Restaurants**

Lionheart Safety Systems Ltd.

**Little Bird Coffee**

**London Food Coordinating Group**

**Long Clawson Dairy Ltd**

**Love My Health**

**Manchester City Council Environmental Health team**

**Marks and Spencer**

**Marston's Pubs & Bars**

Martha trust

**Martin Thomas Family Butchers**

Mayfield Grammar School

**McCain Foods**

**McDonald's UK**

**Menu Guide Pro (part of Glint Media Ltd)**

Merton College

MID ULSTER DISTRICT COUNCIL

**Mitchells & Butlers**

**mmmm Cakes**

mobile bar hire and sales Ltd

**Mondelez International**

Morning Foods Ltd

**Moto**

**Moy Park**

My Sugar Fairy Cakes

**Nando's Chickenland Ltd**

**National Craft Butchers**

**Nestle UK Ltd**

**New Bean Cafe**

NHS (Children allergy doctor)

NHS England

**Ninkee Ltd**

No1 Living

**Nomad Foods**

Norfolk CC

**Norfolk County Council Trading Standards**

Nottingham Children's Hospital, Nottingham University Hospitals NHS Trust

**Nut Free Food Guide/ Nutfreeliving Market Place**

**Oatly**

**OCADO RETAIL LTD**

Orian

Orkney Islands Council

Oviva

Oxford High School

**P&B (Foods) Ltd**

Paediatric Dietitian

**Palhota**

**Peak Supps Ltd**

**PepsiCo UK and Ireland**

Pioneer Foodservice

Pip & Nut

Plant-based Food Alliance UK

**POP Food Technical Consultancy Ltd**

**Prefer not to say**

**Pret A Manger**

**Price Marriner & Associates Limited**

Prime Source Foods Ltd

PRINCES LTD

Private

**Provision Trade Federation**

Pulsin

Qualtec Consulting

R&R Ice Cream

Ragdale Hall spa

Redcar & Cleveland Council

**Ren<sup>v</sup>© Crevel Consulting Limited**

Retail and manufacturing

**Rhondda Cynon Taf County Borough Council**

Royal Borough of Greenwich

**Royal High School Bath**

**Royal Northern College of Music**

Royal United Hospital Bath

Royal United Hospital Foundation Trust

**RSSL**

**Safe Sustainable Authentic Food Wales (SSAFW) Committee**

**Safety in Action**

Salt River foods

**Samworth Brothers Ltd**

Scandtys Ltd.

Seagreens Ltd

**Selfridges & Co**

Selfridges& Co

Shire Foods

**Shire Foods Limited**

SIPS

SIPS Education

**Sisters Traditional Fish and Chips**

**Sleaford Quality Foods Ltd**

**Society of Food Hygiene and Technology**

**Sodexo Ltd**

**SophistiCakes**

**South Eastern Health and Social Care Trust**

Southwark Council

**SPAR UK Ltd**

**St. Davids Food And Wine**

St. Albans City and District Council

**Starbucks Coffee Company UK**

Stephens Fresh Foods

Stokesley School

Student Middlesex University

Suki Tea

Sussex Bake Down

Sussex bakedown

**Swindon Borough Council**

Taste Original

**Tasty Foods**

**Tata Consumer Products LTD**

**The Allergy Team**

**The Bart Ingredients Co Ltd**

The Cake Professionals

**The Consumer Council**

**The Federation of Small Businesses (FSB)**

THE JUNCTION LODGE

The Quadram Institute

The Streetly Academy

**The Vegan Society**

**Tom & Simon's kitchen**

Torbay Council

**Towngate Fisheries**

**Trading Standards East Midlands (TSEM)**

**Trading Standards North West**

**Trading Standards South East (TSSE)**

**Trading Standards Wales**



**UK Flour Millers**

**UK Potato Processors' Association (PPA)**

**UK Hospitality**

**Unilever**

**Unitas Wholesale**

University of Bath

University of Bristol

University of Cambridge

University of Glasgow

University of Leeds

University of Parma

Upfield

**VEG OUT**

Warburtons

**Webbs Garden Centres**

West Suffolk Hospital

**West Yorkshire Trading Standards**

Westaway Sausages Limited

Wigan Council

**World Wise Foods Ltd**

**Young's Seafoods Limited**

**Zero2five Food Industry, Cardiff Metropolitan University**