



Guidance on Allergen Management and Consumer Information - Evaluation Research

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Guidance on Allergen Management and Consumer Information - Evaluation Research

Administrative Information

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1. Executive Summary

BACKGROUND AND OBJECTIVES

In 2006, the Food Standards Agency (FSA) published voluntary Guidance on Allergen Management and Consumer Information. This is best practice guidance on controlling food allergens in the factory setting, with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling).

This guidance, which was accompanied by a leaflet for smaller businesses, was disseminated by members of the drafting group to their members (e.g. the Food and Drink Federation, the British Retail Consortium and LACORS), as well as by announcing it in a press release, placing media stories and via radio interviews. In addition, the Agency has recently undertaken a series of training workshops for enforcement officers where the guidance was discussed and those who received the training were given copies.

In 2008, the Agency developed research objectives focusing primarily on assessing the uptake and effectiveness of the 2006 guidance.

The more specific research objectives were to:

- Ascertain levels of awareness amongst businesses and Enforcement Officers (and how they became aware).
- Explore attitudes towards the guidance - does it meet the need for authoritative guidance?
- Understand the impact of the guidance - is it being followed? Has it led to changes?
- Identify any improvements to the content of the guidance (full guidance and leaflet).
- Understand whether the dissemination of the guidance could be improved.
- Establish whether the voluntary 'best practice' nature of the guidance is perceived to be better/more effective or otherwise than compulsory legislation.

RESEARCH METHODOLOGY

The project comprised of both qualitative and quantitative research, running between September and early November 2008.

For the qualitative stage, a total of 35 in-depth interviews were conducted with:

- 18 food manufacturers.
- 6 large retailers.
- 3 training bodies.
- 8 Enforcement Officers (EHOs/TSOs).

Most interviews were conducted before the quantitative stage to help inform the quantitative research design. However, 9 in-depth interviews were conducted after the quantitative stage (with respondents who had taken part in the quantitative stage and were identified as giving interesting responses worth further exploration). Some of these follow-up depths were reported as case studies.

For the quantitative stage, a total of 382 semi-structured telephone interviews were conducted with:

- 255 free-found food manufacturers (aware of guidance).
- 27 food manufacturers who ordered a hard copy of the guidance from the FSA.
- 100 Enforcement Officers.

In addition, those food manufacturers screened out of the main interview because they were unaware of the guidance (n=251) were asked a small number of questions to assess perceived usefulness of the guidance and information sources for allergens they currently use.

MAIN FINDINGS

Guidance awareness and readership

Just over a half of the food manufacturers (53%) were aware of either the full guidance or the leaflet. 48% were aware of the full guidance, while 22% were aware of the leaflet (with some aware of both). Awareness of either was much higher among large businesses (81%) than 'micro' businesses i.e. those with fewer than 20 employees (37%). Around a half of small-medium sized businesses i.e. those with 20-249 employees were aware of the guidance.

Most manufacturers became aware of the guidance either through internet searches on 'allergens' leading to the guidance on the FSA website or, particularly in the case of smaller organisations, through their EHO or TSO.

Over three quarters of Enforcement Officers (78%) were aware of the full guidance or the leaflet. Over a quarter (of those aware) had been told about it or given it at a training course. A similar number had been sent an email alert by the FSA, and 23% had found it on the FSA website (when looking for information on allergens generally).

Awareness amongst retailers was mixed, whilst most training bodies were aware.

Once manufacturers and Enforcement Officers became aware of the guidance this almost always converted into access (i.e. read on internet/order hard copy), and then readership. Very few become aware of it and then do nothing. Manufacturers were more likely to read the guidance in detail than Enforcement Officers.

Opinion of the guidance

Opinion of the guidance was very positive with 100% of manufacturers rating the full guidance as useful, while 74% did the same for the leaflet. Most of those that did not rate the leaflet as useful, rated the full guidance as useful i.e. the leaflet was not aimed at them and they were fine with this as they used the full guidance instead.

In addition, those manufacturers unaware of the guidance thought it would be useful. These respondents were read a short description of the guidance and asked to say how useful they thought it would be. 83% thought it would very or fairly useful.

Over 80% of Enforcement Officers felt the full guidance and the leaflet were useful to both themselves and the businesses they work with. Indeed 96% of Enforcement Officers rated the leaflet as useful for themselves (mainly as an aide memoir) and 88% rated the full guidance as useful for the businesses they deal with.

Both documents were rated well on attributes relating to ease of reading, navigation and layout but showed some relative weakness in terms of relevance, ease of application and offering practical solutions (although negative scores were very low). It was apparent, however, that many were frustrated that the guidance was not updated more regularly (evidenced by the fact that only 12 foods out of 14 were included i.e. lupins and molluscs were missing). This can undermine its usefulness as some people think it is out of date and therefore of less value. A few manufacturers and Enforcement Officers thought there needed to be something that was longer than the leaflet but shorter than the full guidance.

Usage and impact of the guidance

Over 90% of Enforcement Officers who have accessed the guidance are actually using it, either to inform their own approach to the issue or in their communications with businesses. The full guidance is mainly used to formulate their own approach to the issue, while the leaflet is used to hand out to local businesses and also as a guide i.e. to show specific pages/sections to businesses.

Manufacturers also told us that both the leaflet and particularly the full guidance have had a large impact on their business. Reading the documents had led to most businesses doing something as a result, ranging from checking their current procedures to fundamental changes to the way they tackle allergens and allergen labelling.

Dissemination of the guidance

Most manufacturers accessed the guidance through a general internet search (for 'allergens') leading them to guidance on the FSA website. However, micro businesses were more likely to cite their TSO/EHO as making them aware of the guidance. Other sources included: retailers they supply, the BRC, work colleagues or friends from other like organisations, food research organisations (that they have asked to help) and training sessions (the last two were more common among medium and large sized businesses). Many manufacturers think there is a role for TSOs and EHOs to tell businesses about the guidance and to encourage them to sign up to FSA email alerts (so they get to hear earlier and not reliant on the next EHO/TSO visit).

Enforcement Officers were asked to suggest ways in which the dissemination of the guidance could be improved, both to themselves and to business. Overall, they were content with the current ways in which they personally receive the guidance, with very few suggestions for improvement emerging. They were, however, more forthcoming when it came to suggestions for optimising communications with businesses. The following were cited:

- print the guidance in other languages (and use ethnic publishing groups).
- send it to businesses directly/mailshots.
- improve the navigation of the FSA website (some businesses had unsuccessfully searched for it after being advised to by the Enforcement Officer).
- disseminate via trade organisations e.g. FDF, BRC.
- place advertisements in trade magazines and supply Enforcement Officers with more leaflets for distribution.

Perceptions of the FSA

Amongst manufacturers, the FSA was by far the most easily recalled and influential organisation when thinking of bodies involved in food allergen and food allergen labelling. The FSA was followed by the Local Authority/TSO/EHO, which had a higher level of recall among micro businesses. Results were similar among Enforcement Officers with the FSA the most prominent, widely used and most useful organisation that they are aware of in relation to the topic at hand. It should be borne in mind, however, that the FSA was introduced as the sponsor of this research which will have undoubtedly boosted the level of recall, so these results need to be treated with caution.

76% of the manufacturers taking part in the survey had received training or advice on allergens/allergen labelling in the last few years. 27% of these manufacturers had received this training or advice from the FSA, whilst 35% and 28% respectively received it from food research organisations or specialist training providers.

A total of 38% of Enforcement Officers have had external or internal training or feedback from colleagues about the guidance. Of the 28% of Enforcement Officers (n=28) receiving direct external training, the majority (20) received this training via the FSA (4 via Hygiene Audit Systems, 2 via CIEH).

Legal Status

On the question of whether the guidance should remain voluntary guidance or become compulsory, almost two thirds of both Enforcement Officers and manufacturers felt that it should become compulsory. The picture is less clear cut amongst the large and the micro businesses, where opinion is split approximately 50:50, for and against (but often for different reasons). Micro businesses are concerned about the additional burden, whilst large businesses are more likely to think the regulations would be unworkable.

The qualitative interviews suggested that many of those who think it should become compulsory would want this to be introduced in the medium to long term (rather than in the short term).

RECOMMENDATIONS

It is clear that the guidance is appreciated and used by almost all those who are aware it. However, 47% of manufacturers and 22% of Enforcement Officers in this survey were unaware of it (furthermore, the majority of those unaware reported that it sounded useful).

The first recommendation would therefore be to take steps to increase awareness by:

- Further promotions in the trade press.
- Further promotions through the BRC and its network.
- Improving the FSA search engine so that 'allergens' come higher up the list of searches.
- Having a direct and visible link from the FSA home page to the relevant section.
- Sending more leaflets to Enforcement Officers.
- Publishing at least the leaflet in the main non-English languages.

Although respondents struggled to come up with many suggestions for improvement, there was clearly some appetite to see some changes to the guidance itself:

- Include more practical examples of how recommendations can be applied to the workplace (possibly as links to other sections of the FSA website in order to keep the guidance reasonably concise).
- Produce a version that is more detailed than the leaflet but shorter than the full guidance.
- Ensure that it is kept up to date so that it appears more relevant.

2. Background and Objectives

The UK Food Standards Agency aims to protect public health from risks that may arise in connection with the consumption of food, and otherwise to protect the interests of consumers in relation to food.

The Agency's strategic plan 2005-2010 has as its key aims:

- To continue to reduce foodborne illness.
- To reduce further the risk to consumers from chemical contamination including radiological contamination of food.
- To make it easier for all consumers to choose a healthy diet, and thereby improve quality of life by reducing diet-related disease.
- To enable consumers to make informed choices.

The Agency's approach to food sensitivity i.e. food allergy and intolerance has three main aims:

- 1) Fund research that will help increase knowledge and understanding of food allergy and intolerance.
- 2) Strengthen food labelling rules to help people who need to avoid certain ingredients.
- 3) Help raise awareness of food allergy and intolerance among caterers.

In 2003, the Agency agreed an action plan to help consumers with food sensitivity. One component of this plan was to develop voluntary guidance for industry on aspects of allergen management and information outside statutory control.

In 2006, the Agency published voluntary **Guidance on Allergen Management and Consumer Information**¹, which is best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). This guidance, which was accompanied by a leaflet for smaller businesses, was disseminated by members of the drafting group to their members (e.g. the Food and Drink Federation, the British Retail Consortium and LACORS), as well as by announcing it in a press release, placing media stories and via radio interviews. In addition, the Agency has recently undertaken a series of training workshops for enforcement officers where the guidance was discussed and those who received the training were given copies.

¹ food.gov.uk/multimedia/pdfs/maycontainguide.pdf

The guidance will have an impact on the following audiences across the UK:

- **Manufacturers** of pre-packed food – this could range from the largest manufacturers of pre-packed food to sole-traders producing just one pre-packed food product.
- **Retailers** selling pre-packed food where they are involved with food labelling or influencing smaller manufacturers with regards to food labelling – this would include only the larger retailers.
- **Training Bodies** – those who have used this guidance to provide training to others.
- **Enforcement Officers** – those responsible for checking food labelling (mainly TSOs and, to a lesser extent, EHOs).

Approximately 20,000 hardcopies of the mini guide (leaflet) and 1,800 of the full guidance have been ordered by 380 organisations/individuals – a mix of private companies, individuals (possibly representing companies) and local authorities. Local authorities then distribute the guide locally to small food businesses. Many more businesses will have downloaded the guide from the Internet.

In 2008, the Agency developed research objectives focusing primarily on **assessing the uptake and effectiveness of the 2006 guidance**.

More specifically, the research objectives were to:

- Ascertain levels of awareness amongst businesses and Enforcement Officers and how they became aware.
- Explore attitudes towards the guidance - does it meet the need for authoritative guidance?
- Understand the impact of the guidance - is it being followed? Has it led to changes?
- Identify any improvements to the content of the guidance (full guidance and leaflet).
- Understand whether the dissemination of the guidance could be improved.
- Establish whether the voluntary 'best practice' nature of the guidance is perceived to be better/more effective or otherwise than compulsory legislation.

3. Methodology and Sample Profile

The research was conducted through a combination of qualitative in-depth telephone interviews with food manufacturers, large retailers, training bodies and Enforcement Officers and semi-structured quantitative telephone interviews with food manufacturers and Enforcement Officers.

3.1. Overview of approach

The project was split into three phases.

Stage One - Qualitative

- 26 in-depth interviews:
 - 10 food manufacturers.
 - 5 large retailers.
 - 3 training bodies.
 - 8 Enforcement Officers.
- This stage examined relevant topics in-depth, enriching the quantitative responses but also informing the quantitative research design.

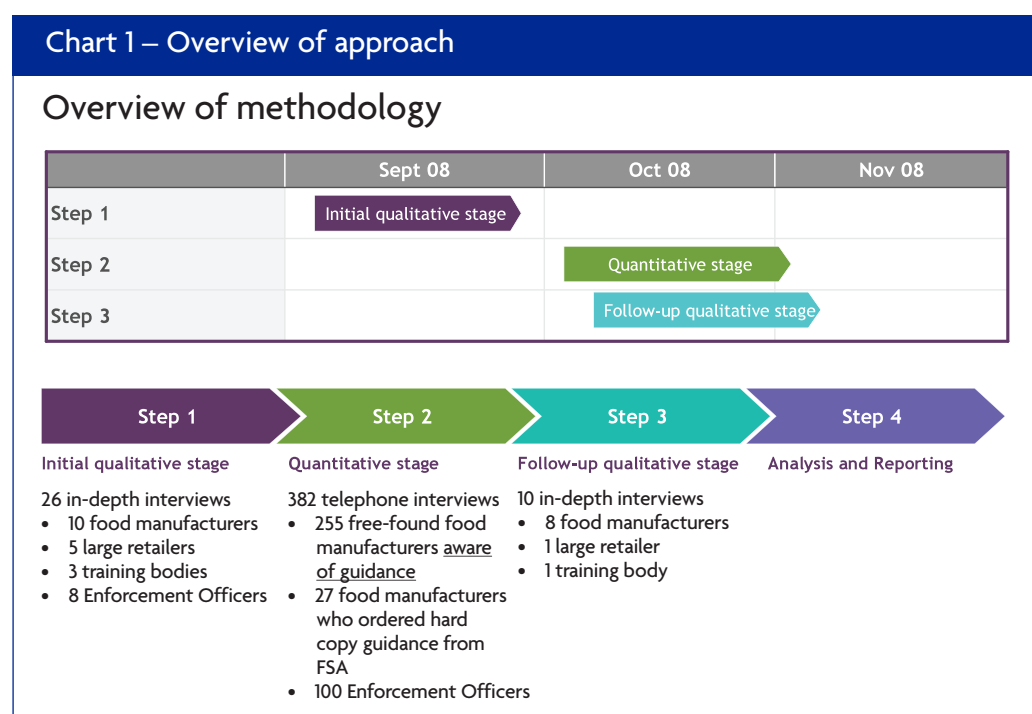
Stage Two – Quantitative

- 382 telephone interviews:
 - 255 free-found food manufacturers (aware of guidance)
 - 27 food manufacturers who ordered a hard copy of the guidance from FSA
 - 100 Enforcement Officers.
- This stage measured uptake and the extent to which particular views towards the guidance were held across the sample.

Stage Three – Qualitative

- 9 in-depth interviews:
 - 8 food manufacturers.
 - 1 large retailer.
- This stage allowed us to follow up accounts recorded in the previous phases resulting in case studies illustrating how the guidance was used in practice.

Chart 1 (overleaf) summarises when interviewing took place.



3.2. In-depth interviews

A total of 35 in-depth telephone interviews were completed during the study: 26 pre-quantitative and 9 as follow-up to the quantitative stage.

These interviews break down as follows:

- **18 manufacturers of pre-packed food**
 - 6 ‘large’ manufacturers (250 or more employees).
 - 12 ‘small-medium’ manufacturers, mix of:
 - ◆ Micro (<20 employees)
 - ◆ Small (20-49 employees)
 - ◆ Medium (50-249 employees)
 - Mix of countries (England, Scotland, Wales and NI).
 - To qualify for interview, the respondent had to be fully or partly responsible for the business’s internal handling of food allergens.

- **6 large retailers**
 - To qualify for interview, the respondent had to be fully or partly responsible for the organisation’s handling of food allergens.

- **3 training bodies**
 - To qualify for interview, the respondent had to train food manufacturers and cover the issue of food allergen and food allergen labelling within elements of their training programme/s.
- **8 Enforcement Officers**
 - To qualify for interview, the respondent had to have some responsibility for checking how local businesses handle food allergens and food allergen labelling for pre-packed food.
 - 4 Environmental Health Officers (EHOs) and 4 Trading Standards Officers (TSOs)
 - 2 from each country (England, Scotland, Wales and NI).

In-depth interviews tended to last approximately 45 minutes. All four discussion guides are included in the appendix at the end of this report.

All interviews were audio recorded and analysed by the Jigsaw Research Project Team.

3.3. Quantitative telephone survey

A total of **382 telephone (CATI) interviews** were conducted by a specialist fieldwork agency, Critical Research. Critical Research have conducted the telephone interviews on a large number of FSA projects in the past. The interviews were conducted as follows:

- **255 manufacturers of pre-packed food**
 - This was a free-found sample taken from a purchased list of potential food manufacturers, identified using relevant SIC codes² and screened by interviewers to ensure businesses did manufacture pre-packed food
 - Before the main survey a 'soft launch' of the survey was conducted which involved 50 interviews with food manufacturers to assess response rates and the suitability of the questionnaire. As a result of these initial 50 interviews, the quotas set and the questionnaire was modified to take into account new issues. These 50 interviews were included in the final analysis.
 - In order to enable analysis by company size and by country, minimum quotas were set on:
 - ◆ Company size: 64 micro businesses, 54 small businesses, 78 medium businesses and 59 large businesses.
 - ◆ Country: 104 England, 50 Scotland, 51 Wales and 50 NI.
 - ◆ To enable analysis by these key sub-groups.

² The **Standard Industrial Classification (SIC)** is a system for classifying industries by a four-digit code

- The respondent was fully or partly responsible for the business's internal handling of food allergens.
- All respondents had to be aware of either the full guidance or the leaflet:
 - ◆ Those unaware were asked a few profiling and attitude questions but not the full questionnaire.
- The sample was then weighted to reflect true country proportions, as follows: England – 82%, Scotland – 10%, Wales – 5% and Northern Ireland – 3%. Further detail on weights used is included in the appendix.
- A boost sample of **27 manufacturers of pre-packed food** who ordered a hard copy of the guidance directly from the FSA
 - This sample was supplied by the FSA.
 - The same eligibility criteria was set (as for the free-found sample).
- **100 Enforcement Officers**
 - This was a free-found sample
 - As with food manufacturers, a 'soft launch' of the survey was conducted before the main survey which involved 20 interviews with Enforcement Officers to assess response rates and the suitability of the questionnaire. As a result of these initial 20 interviews, the quotas set and the questionnaire was modified to take into account new issues. These 20 interviews were included in the final analysis.
 - The respondent had to handle at least one business in their area that manufactured pre-packed food.
 - 70 in England, 10 in each of Scotland, Wales and NI.
 - Mix of EHOs and TSOs.
 - Mix of local authority types (County Councils, District Authorities and Unitary Authorities).
 - The sample was then weighted to reflect true country Local Authority proportions, as follows: England – 65%, Scotland – 14%, Wales – 10% and Northern Ireland – 11%. Further detail on weights used is included in the appendix.

The manufacturer interviews lasted just under 20 minutes, while Enforcement Officer interviews lasted approximately 25 minutes. Both questionnaires are included in the appendix at the end of this report.

Data tables and verbatim comments to open-ended questions were generated from these interviews and subsequently analysed by the Jigsaw Research Project Team.

4. Main Findings

The findings from this section are generally based on the results from the quantitative phase of the project, with some supporting evidence from the qualitative phase. These are then enhanced by references and quotations from the quantitative and in-depth interviews wherever appropriate. We have also included a selection of illustrative case studies gathered from the follow-up in-depth interviews.

4.1. Guidance awareness and readership

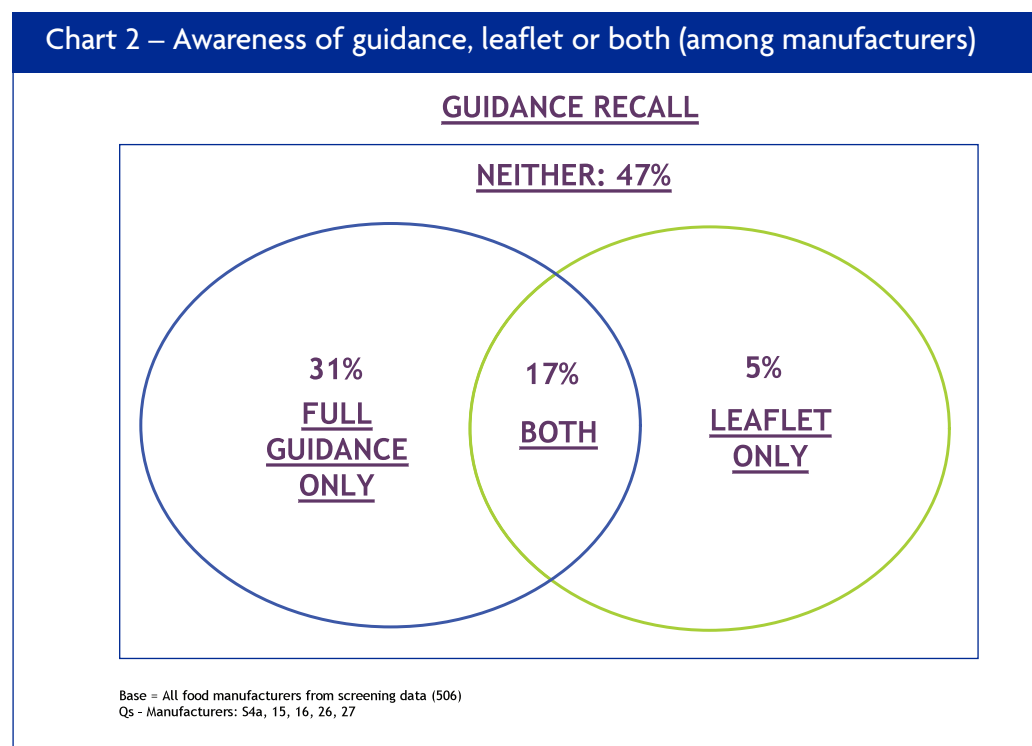
All respondents were asked to visit a simple webpage hosted by the fieldwork agency. This webpage displayed the following pictures of the full guidance and the leaflet to facilitate recall:

Figure 1 – Guidance front page and leaflet front page



Just over a half of the food manufacturers we screened were aware of either the full guidance or the leaflet (chart 2):

- 53% were aware of either the full guidance or the leaflet.
- 48% were aware of the full guidance.
- 22% aware of the leaflet.
- 47% were aware of neither.



Most manufacturers aware of the full guidance claimed to have been aware of it for some time. 52% have been aware for 18 months or longer, 18% for 12-18 months, 17% for 6-12 months and only 10% for less than 6 months.

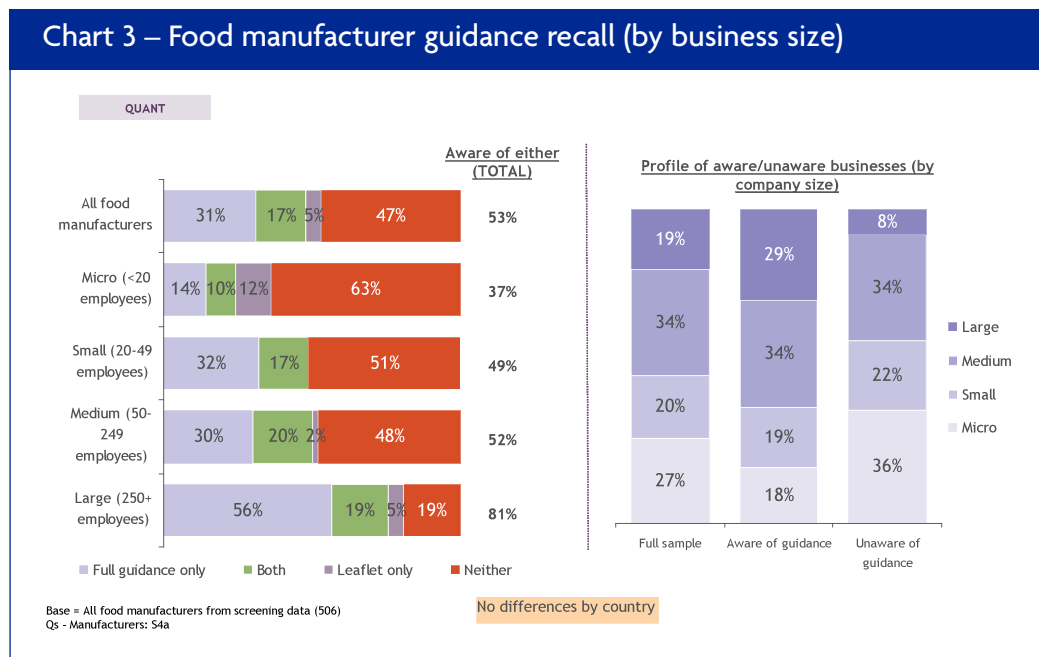
Awareness of the leaflet is often shorter. 17% have been aware for 18 months or longer, 15% for 12-18 months, 22% for 6-12 months and 37% for less than 6 months. It is important to note that those aware of the leaflet were often handed this by an Enforcement Officer, and therefore reliant on the Enforcement Officer to alert them (and why most were not aware as soon as the leaflet was published i.e. if they only see their Enforcement Officer once a year and a visit occurred 6-12 months after publication of the guidance, then they are very unlikely to be aware of the guidance until this visit). For the guidance, this was often found on the FSA website (and often not reliant on prompting from an Enforcement Officer) and so many manufacturers often found this quite soon after it was published.

We also found (from some of the in-depth interviews) that length of awareness is often driven by how long the respondent has been responsible for this issue, rather than a general lack of awareness while in the role i.e. someone who has only been aware for 6 months may have only been in the role for 6-12 months.

Of those manufacturers aware of the full guidance, 43% found it on the FSA website. This happened typically when searching generally for information on allergens e.g. on Google or, in a few cases, via the FSA search engine. Of those manufacturers aware of the leaflet, 31% found it on the FSA website. Other sources (in order of mentions) for being made aware of the guidance/leaflet were:

- The TSO/EHO (mainly mentioned by smaller businesses)
- Work colleagues
- Via Retailers
- Via the BRC
- Food research organisations (mainly mentioned by larger businesses)
- Through training sessions
- Email alerts from the FSA (only a few mentioned this).

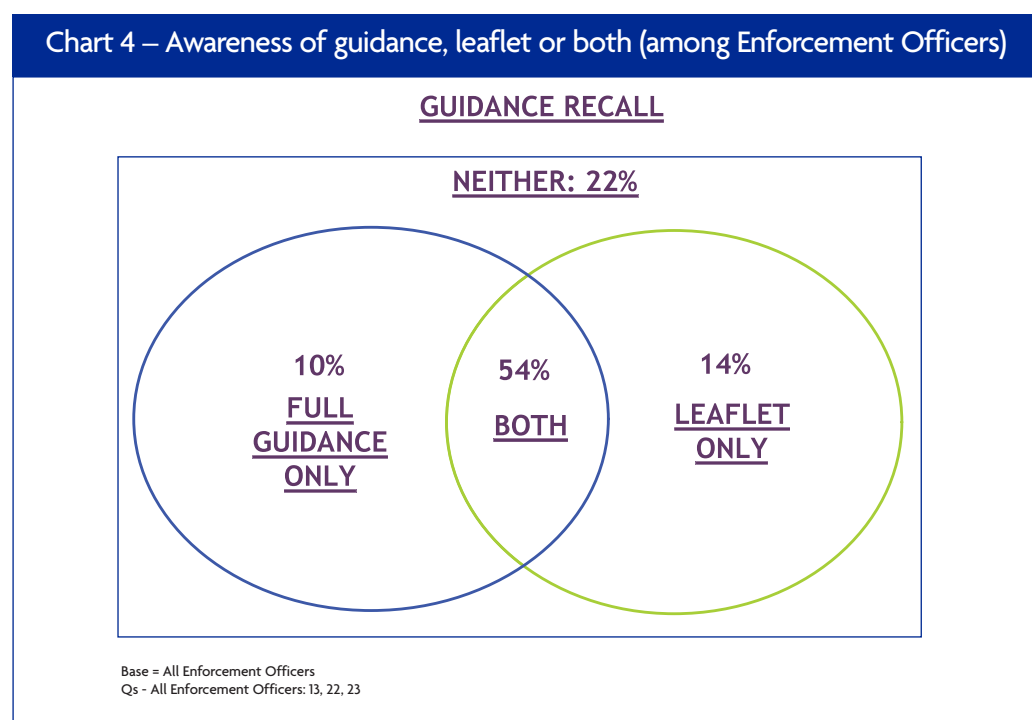
The size of a business has a huge impact on awareness of the full guidance (chart 3). 81% of large manufacturers were aware, whereas just one third of ‘micro’ businesses were able to recall either the full guidance or leaflet. Approximately a half of small-medium sized businesses (20-249 employees) were aware of either the full guidance or leaflet.



The in-depth interviews confirmed that small manufacturers were less likely to be aware of the guidance than medium and large manufacturers. Those responsible for this issue in small manufacturers are less specialised and tend to be busier i.e. they are often the owner or MD. This means they may not see messages about the guidance or have less time to seek out the information proactively. They reported that they were more likely to rely on the EHO/TSO to alert them to this sort of issue.

Over three quarters of Enforcement Officers are aware of the full guidance or the leaflet (chart 4):

- 78% were aware of either the full guidance or the leaflet
- 64% were aware of the full guidance
- 68% aware of the leaflet
- 22% were aware of neither.



Most Enforcement Officers aware of the full guidance have been aware of it for some time (although not as long as manufacturers seem to have been aware of it). 30% have been aware for 18 months or longer, 21% for 12-18 months, 27% for 6-12 months and 17% for less than 6 months. Awareness tended to come from three main sources:

- 29% were told about it or given it at training courses
- 27% had been sent an email alert by the FSA
- 23% found the material on the FSA website (usually when looking for information on allergens generally).

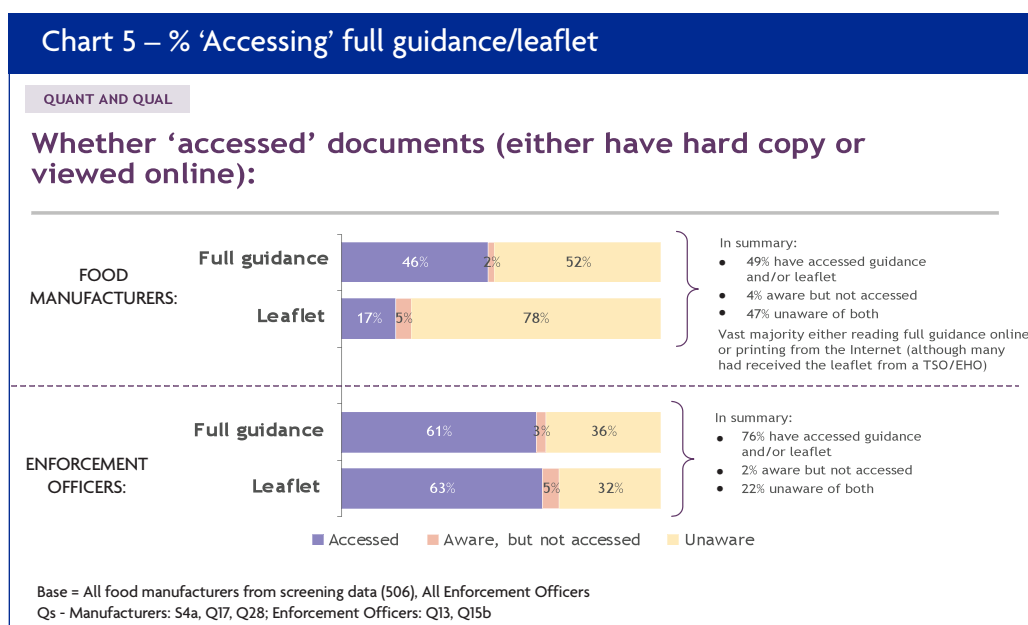
Awareness among large retailers was mixed. Where we found that some large retailers were not aware of the guidance, it was often because they were large enough to employ in-house expertise to handle this issue without the need to refer to external sources. So the person we interviewed may have felt quite knowledgeable about the issue but was not able to specifically recall the guidance. However, some retailers who were unaware did admit that it would be useful to have access to the full guidance.

All three training bodies from the qualitative stage were aware and were often made aware of the guidance via email alerts (from the FSA), through colleagues or just because they were constantly looking for information on this issue and happened to come across the guidance on the FSA website.

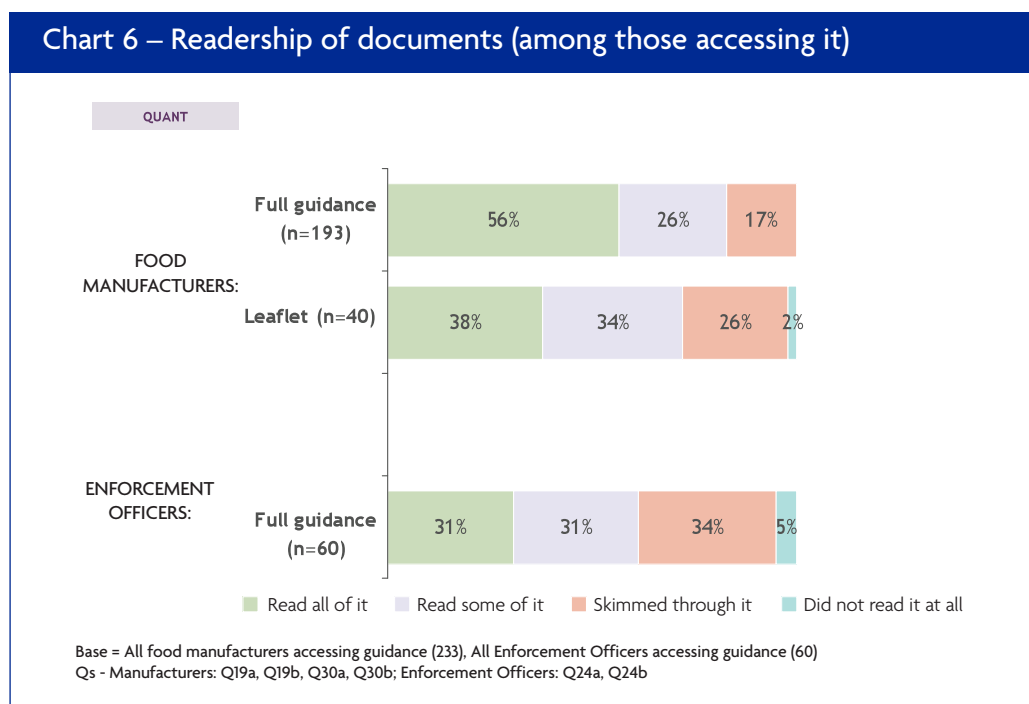
Once manufacturers and Enforcement Officers become aware of the publications, this almost always leads to ‘access’ (either hard copy or online) i.e. very few become aware of the guidance and then decide to ignore it or not read it at all. In summary:

- Of the 53% of manufacturers aware of the full guidance and/or leaflet, 49% then ‘accessed’ at least one of these i.e. ordered a hard copy, printed it out or read it online. Only 4% were aware of either but did not do anything as a result. The remaining 47% were not aware either existed.
- Of the 78% of Enforcement Officers aware of the full guidance and/or leaflet, 76% then ‘accessed’ at least one of these i.e. ordered hard copies, printed it out or read it online. Only 2% were aware of either but did not do anything as a result. The remaining quarter (22%) were not aware either existed.

The breakdown between the guidance and the leaflet can be seen in chart 5 below.



Not only does awareness almost always lead to access but also access almost always leads to readership (although to varying degrees). Of those manufacturers and Enforcement Officers who had accessed the documents, a clear majority had actually read them, although for some this amounted only to skim reading (chart 6).

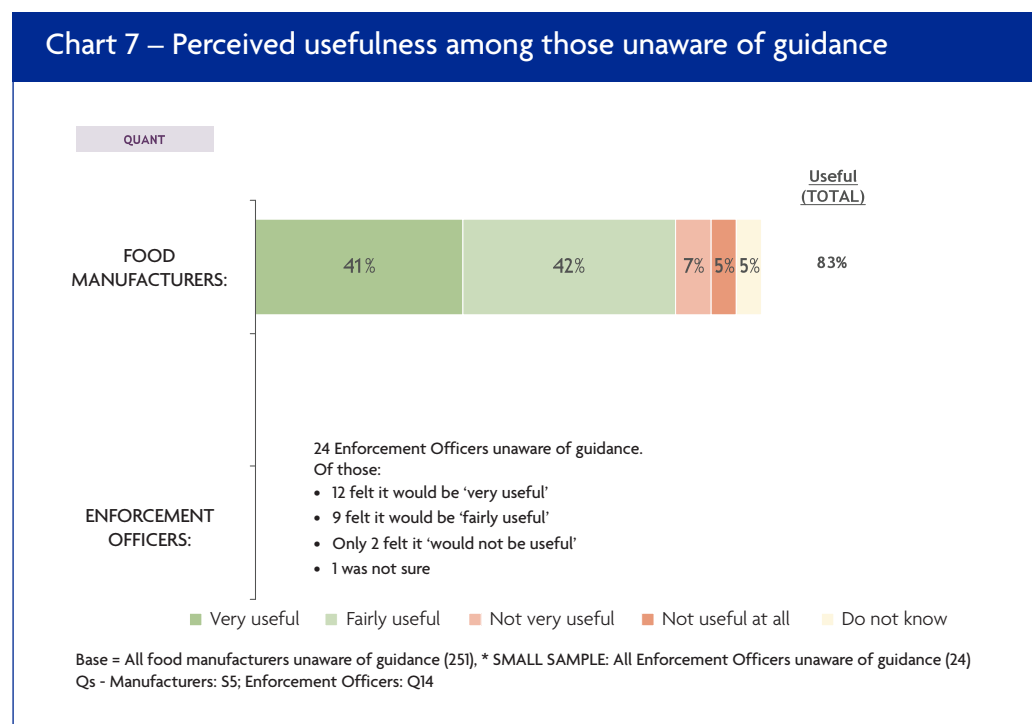


For the few 'aware' manufacturers who had not read the publications (three respondents), the reasons given for not doing so were a lack of time and a lack of (perceived) relevance. When the 'aware' Enforcement Officers who had not read the publications were asked for their reasons (again only 3 respondents), they said that they had been too busy, that only bits of the full guidance were relevant to their role or that it was not useful to local businesses in their area because it was only produced in English.

4.2. Opinion of the guidance

At this point in the interview, those respondents unaware of the guidance were read a description in order that they could give an opinion on its perceived usefulness. The vast majority of both manufacturers and Enforcement Officers (unaware of the guidance) felt that it would be useful (although it is important to note that the sample size of Enforcement Officers unaware of the documents is low: n= 24, and we have therefore reported these results qualitatively).

As can be seen in chart 7, 83% of food manufacturers (unaware of the guidance) thought it would be either very useful or fairly useful (once they were read a description). While 21 of the 24 Enforcement Officers thought it would be useful.

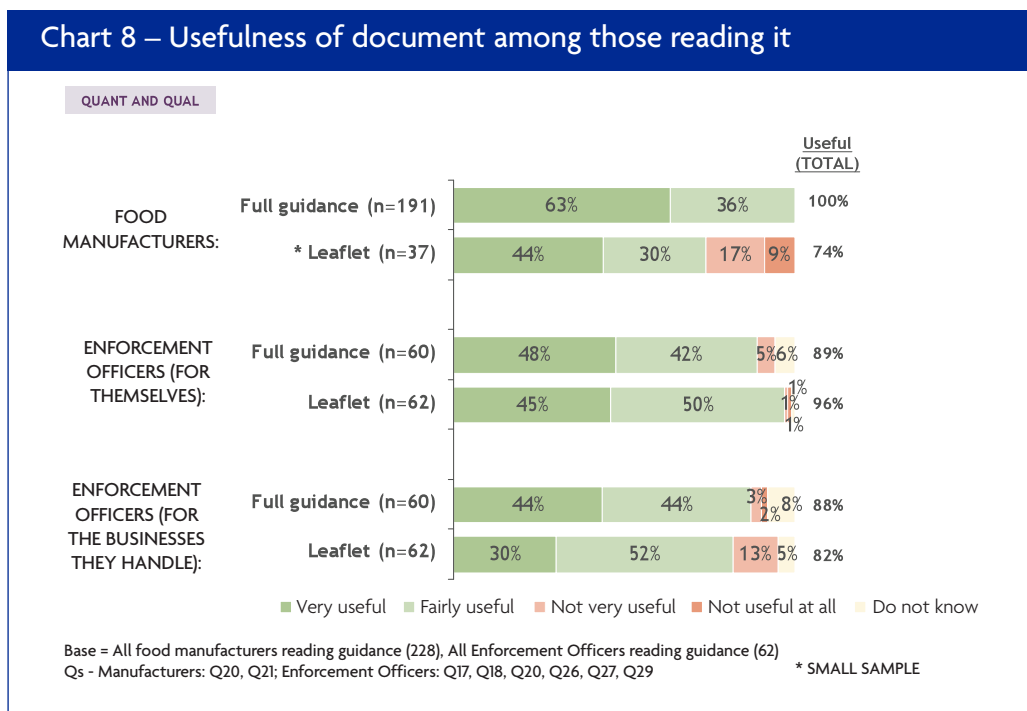


There were no differences in response by size of business or country amongst the manufacturers i.e. all could equally see the potential value.

For the manufacturers and Enforcement Officers who were aware of the guidance and who had read it (at least to some degree), the results were even more positive. In summary:

- All manufacturers who had read the full guidance found it useful
- 74% of manufacturers who had read the leaflet found it useful (note that this is based on a low sample size of 37 respondents). Evidence from the qualitative research was that those who did not find it particularly useful did find the full guidance useful (i.e. the leaflet was not detailed enough, but the full guidance catered to their needs).
- Over 80% of Enforcement Officers found both the full guidance and leaflet useful, both for themselves and for the manufacturers they were visiting. It was evident that they themselves found the leaflet more useful; whereas the full guidance was often more useful for the business they were visiting. Again the qualitative research suggested that this was because the leaflet was a useful 'aide memoir' and a good 'leave behind'; whereas they appreciated that the business needed something more detailed to refer to. From another question in the survey, we found that only 27% of Enforcement Officers thought the leaflet was appropriate for large businesses (it is seen as more appropriate for small businesses). Again this might explain the slightly lower perceived usefulness score for the leaflet (especially if an Enforcement Officer is only dealing with large food manufacturers in their area).

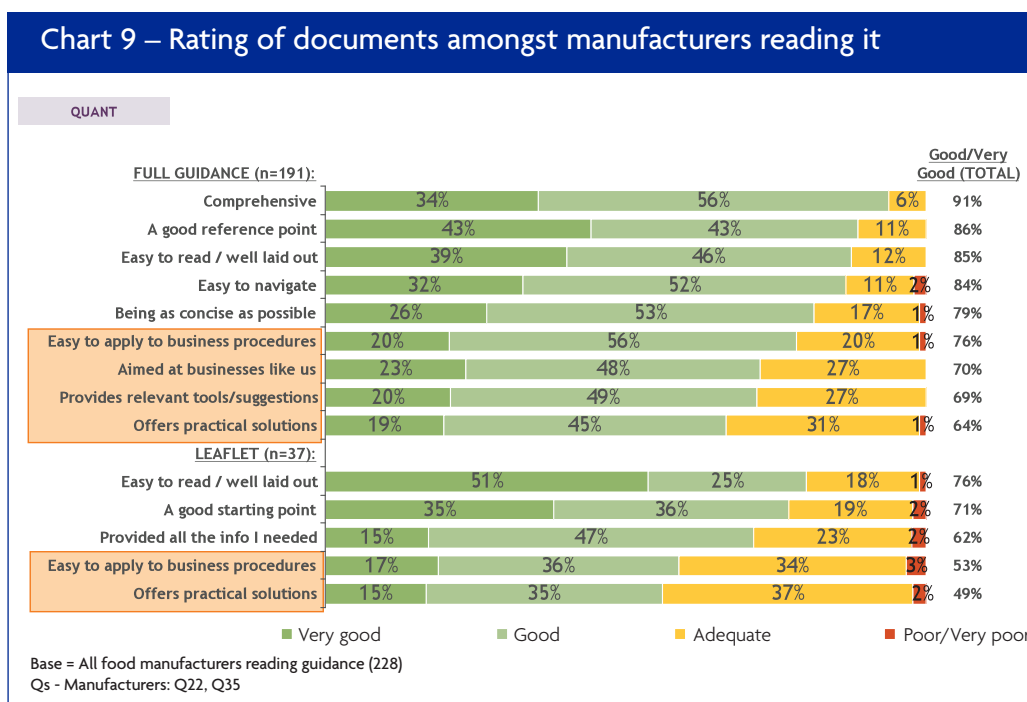
Chart 8 – Usefulness of document among those reading it



Those manufacturers and Enforcement Officers who had read the documents were asked to rate them on a number of different aspects.

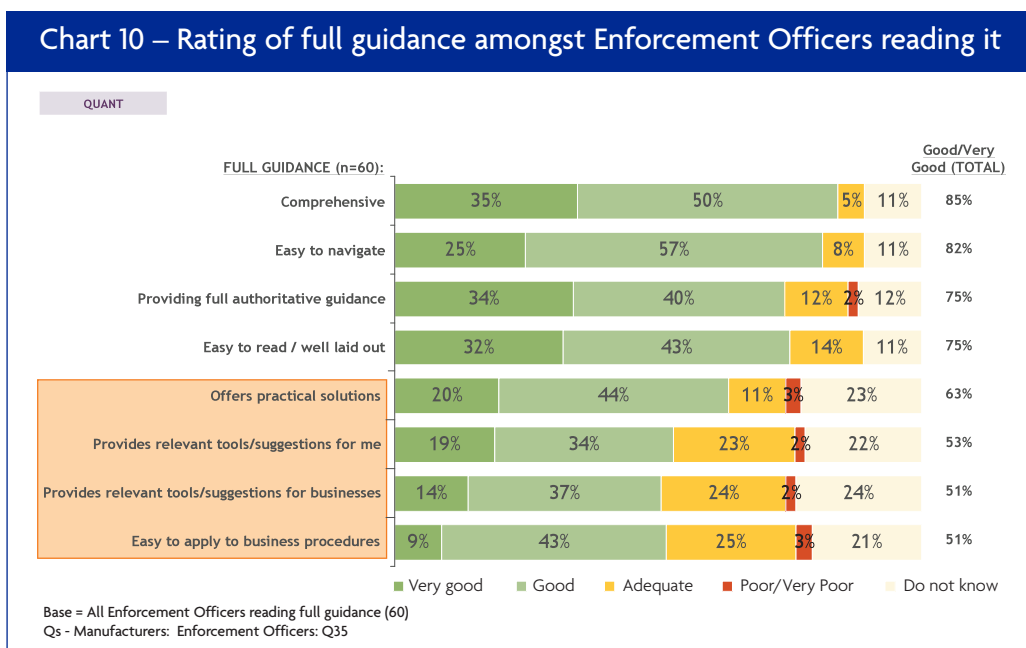
Manufacturers tended to rate both documents highly across all aspects (chart 9). However, it was evident that the documents were rated more positively for elements relating to layout and comprehension, and less positively (although still quite highly) for relevance, ease of application and practical solutions.

Chart 9 – Rating of documents amongst manufacturers reading it



Enforcement Officers were similarly positive with very few negative ratings. Again, the documents were rated more positively for elements relating to layout and comprehension, and less positively for relevance, ease of application and practical solutions. There were higher levels of ‘don’t know’ responses because many Enforcement Officers had not read the guidance in detail.

Chart 10 – Rating of full guidance amongst Enforcement Officers reading it



Manufacturers and Enforcement Officers (from both the qualitative and quantitative interviews) were asked what they found useful about the leaflet/full guidance and any specific likes and dislikes (chart 11). Positives centre on the layout, the information provided and the ease of understanding. While most struggled to find negatives about the full guidance, there were some negatives raised about the leaflet, mainly the lack of detail and perceived lack of relevance (for them).

Chart 11 – What was useful, plus likes and dislikes

QUANT AND QUAL		MANUFACTURERS:		ENFORCEMENT OFFICERS:	
		Leaflet	Guidance	Leaflet	Guidance
Positive comments		<ul style="list-style-type: none"> Easy to read Straight to the point Increased awareness of the situation Told me what I needed to know (usually the list of allergens) Tied in with BRC requirements Good document to show staff A good starting point 	<ul style="list-style-type: none"> Well laid out Well written/easy to understand Confirmed what I knew (but reassuring) Good reference document Told us what controls to put in place Specifically liked: decision tree, risk assessment, list of allergens, flow diagrams 	<ul style="list-style-type: none"> Works well as a brief overview/starting point Useful for small/new businesses Good as a handout Easy to read/concise Good reminder document for Enforcement Officer when talking to customers 	<ul style="list-style-type: none"> Less able to provide detailed feedback as many admitted not reading it in full Well laid out Well written/easy to understand Provides more detail (when I need it) Comprehensive/sets out in detail what to do
	Negative comments		<ul style="list-style-type: none"> Not enough detail Not relevant to us (do not use any of the high risk foods / never had a problem before) 	<ul style="list-style-type: none"> Most unable to find fault Too basic (technical manager at large manufacturer) Not enough practical examples Too detailed (mainly small manufacturers) 	<ul style="list-style-type: none"> Not detailed enough Prefer to tailor my presentation to each customer Supermarkets already provide businesses with this information Difficult to apply to business

The **retailers** we spoke to in the qualitative phase were generally complimentary about the guidance, although many of them had not read it in detail, or for many months. They saw it as well-written, comprehensive and easy to understand. However, most felt they already have the relevant measures in place, and would be more likely to visit the FSA's website if advice were needed. Some retailers will use it to show to food manufacturer suppliers or when checking their procedures:

"We have a team of people that visit suppliers and people that manufacture on our behalf and they would use it to review their processes."

Training bodies also thought the guidance was useful, both for themselves and for the food manufacturers they train. In particular, the decision tree was liked and seen as useful, as well as the guide on how to do risk assessments. One training body we spoke to had already integrated the guidance into their training programme, while one was considering it:

"There is some good information on severity, some good technical information, how prevalent they are in different countries and the legal considerations, all very useful information. I might print off a copy of this for the next course I run, and also ring the FSA to get a copy of it."

When asked to suggest improvements to the full guidance, most manufacturers and Enforcement Officers were unable to come up with anything specific. Some, however, did feel it could be made more practical and easier to apply in the workplace. The following were suggested improvements to the guidance from **manufacturers**:

- Make it practical to use, or include more examples of how it has been used by other (like) businesses.

"It should describe how to use more practical labelling and how to identify allergens with equipment. The guide needs to be more practical to use."

"It needs more development to explain in depth how to apply current procedures. More specific steps of control and more explanation of best practice."

- Make it more concise (mainly small businesses).
- Make it more detailed/more complex (mainly large businesses).
- Make it more relevant (like the Anaphylaxis Campaign Standards).

They also felt it should be updated more regularly:

"They really have to include the two new allergens, which are lupin and molluscs. We got our copy in August this year and the two allergens were not included. It was a bit disappointing as we got the guidance specifically for an audit."

There were only a few comments about 'quantifying' the risk levels i.e. what constitutes an acceptable risk.

Most **Enforcement Officers** were unable to suggest any improvements. Those that were able to, tended to raise similar suggestions. General comments included that it needed to be:

- Shorter. There needed to be something in-between the full guidance and the leaflet (the leaflet was too short, while the full guidance was too detailed).

“56 pages is too big for a guidance document, it needs to be shorter and more relevant to the specific issues we have to deal with, which are allergies and cross contamination.”

- More practical to use.
- Clear on differences between legal requirements and good practice.

There was only one comment made with regard to quantifying risk levels:

“There is no hard and fast answer to an issue. it is left to the opinion of either myself or the business”

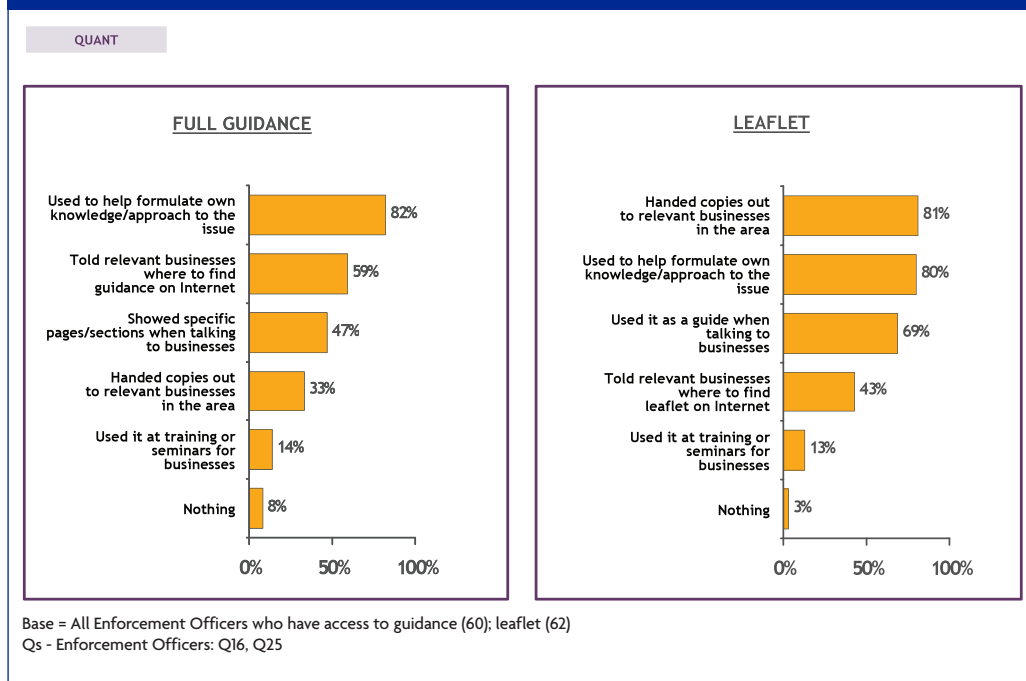
4.3. Usage and impact of the guidance

Over 90% of Enforcement Officers who have accessed the guidance or leaflet have actually used each resource.

Around four fifths (82%) with access to the full guidance have used it to formulate their own approach to the issue. They are also actively using the documents in their communications with businesses. 59% have told relevant businesses where to find the full guidance on the Internet, while just under half (47%) have used it to show specific pages/sections to businesses. A third have handed out hard copies, while 14% have used it at training sessions or seminars for businesses. Fewer than one in ten (8%) who have accessed the full guidance have not used it at all.

With regards to the leaflet, a large proportion of those with access have handed copies out to local businesses (81%) and have used it to show specific pages/sections to businesses (80%). Over two-thirds have used the leaflet as a guide when talking to businesses. Only 3% of Enforcement Officers who have accessed the leaflet have not used it at all.

Chart 12 – Actions taken by Enforcement Officers with the full guidance or the leaflet



Manufacturers were asked to comment on any changes they had made as a result of reading the leaflet or full guidance and most were able to provide real examples of the impact the documents had made.

As far as the **leaflet** was concerned manufacturers told us that:

- Some had changed their labelling (although not always correctly) e.g. to “produced in a bakery where nuts are handled”.
- Measures were often taken to reduce the risk of cross contamination, such as introducing physical contamination controls, making changes to existing controls and altering storage procedures.
- Some used it as part of their training to both existing staff and new joiners.

The **full guidance** has also had a large impact on manufacturers. Most have done at least something as a result of reading the guidance, including:

- Changing their approach to labelling.
- Updating the allergens they controlled for.
- Changing their risk assessment measures.
- Changing their procedures for cross-contamination e.g. introducing colour coded systems, changing their cleaning procedures, considering items like packed lunches and the shampoo that staff are using into their overall procedures, stricter controls generally.

“It totally changed from being a vegetarian and non-vegetarian environment to an allergen segregated environment. We now use colour coding and specialist staff training with allergen management is in use constantly.”

- Some used it for staff training.

Even those not using it to overhaul their current procedures were often using it to double check that what they were currently doing was correct.

Even some of those who have done nothing so far, plan to do something in the future. 35% of those who have read the guidance claim they will make some changes in the future as a result of the guidance. This was higher among micro businesses (fewer than 20 employees) where 46% said they would make changes in the future (we often find that those responsible for this issue in micro businesses will be busier and therefore less likely to have tackled this issue straight away).

It became clear during the in-depth interviews that manufacturers used the guidance sporadically on a needs basis, rather than as a regular occurrence. They tend to use the guidance to check that their current systems are satisfactory and make tweaks where necessary or fundamentally change their systems to fit in with the guidance's recommendations. Once this is achieved, there is a feeling that nothing else needs to be done until the requirements change again, for example the BRC makes new demands or the guidance changes/is updated.

There is no evidence that the guidance is not used on a more regular basis due to its content. Although there were specific criticisms of the guidance, the issues raised do not appear to affect the regularity with which it is referred to.

Here we include **three case studies**, drawn from the qualitative work, in order to illustrate typical scenarios where the guidance has been used:

Case study 1 – Retail Bakery	
Background	<p>The respondent was the Technical Manager of a cake and bun retailer.</p> <p>They operate on only one site and qualify as a small business (21 employees). They supply a retailer (Sainsbury) and a food manufacturer (Dunns).</p>
In the past	<p>They only put the foods actually in the product on the label and didn't think about cross-contamination. Their EHO was happy with this arrangement.</p>
Awareness and usage of guidance	<p>The business was subsequently pressured by the BRC to put procedures in place to tackle cross-contamination. They searched for 'allergens' on Google and came across the FSA guidance, which they printed out and read through. The business found it very easy to understand and use, and particularly liked using the decision tree.</p>
Impact of guidance	<p>They now have new systems in place to tackle cross-contamination and labelling. They use a spreadsheet that lists all ingredients and suppliers and has a list of allergens along the top. They then colour code each allergen by each ingredient.</p>
Current use of guidance	<p>It will be used if and when needed. For example, they had to use it a week before the interview when the BRC changed their allergens requirements and so referred to it again. However, the respondent reported that they found it hard to locate when searching on the FSA website.</p>

Case study 2 – A cake manufacturer

Background	This company manufactured cakes across three sites where allergens are present - wheat, nuts, milk and egg.
In the past	They had an HACCP system for allergen management with swabbing taking place to ensure no cross-contamination.
Awareness and usage of guidance	The full guidance was seen as crucial in setting up and establishing their food allergen management and labelling. There is a copy of the guide kept in the office. <i>“The guide was like a bible to us.”</i>
Impact of guidance	The guide was used extensively in establishing their policies and procedures to food allergen management. The flow charts were particularly useful.
Current use of guidance	The guide has not been used at all recently, <i>“I haven’t touched it in years”</i> . However, it remains an important resource for future reference.

Case study 3 – A pasta manufacturer

Background	This company manufactures pasta across two sites (a mill and a factory), where two allergens are present - wheat and egg.
In the past	Only allergens contained within the product were listed as ingredients, despite the risk of cross-contamination.
Awareness and usage of guidance	The full guidance was seen as vital in informing their allergen management procedures. The respondent is a regular user of the guide mainly via the internet (although he does have a hardcopy) - he has the guide listed in his internet browser ‘favourites’ for easy access. <i>“The guide is very, very good, very, very useful and has worked examples which include egg pasta (Number 5) which is very relevant to us”.</i>
Impact of guidance	Products are now run off in allergen batches i.e. all products containing the same allergen are run off consecutively and then that line is shut down and cleaned to remove the allergen. The guide has also been used to produce a two page document to pass on to all employees and other people coming into contact with the business. The guidance has also informed their allergen awareness training with the respondent using the guidance to develop their own internal literature on the issue (see below)
Current use of guidance	It is now used as and when it is needed and remains the first point of reference for allergen related issues. <i>“The FSA guide is my first port of call for anything allergen related”.</i>

As mentioned above, the pasta manufacturer had actually used the information provided in the full guidance to develop their own internal literature. A copy of this can be seen here:

Figure 2a – Example of Internal literature developed from guidance (page 1)

Figure 2a – Example of Internal literature developed from guidance (page 1)

<p style="text-align: center; color: red; font-weight: bold;">FOOD SAFETY POLICY</p> <p style="text-align: center; font-size: 1.2em; font-weight: bold;">Food Safety Policy:</p> <p style="text-align: center; background-color: #8bc34a; color: white; padding: 2px; font-weight: bold;">GMP02</p> <p style="text-align: center; font-size: 1.5em; font-weight: bold; margin-top: 20px;">FOOD ALLERGEN AWARENESS</p> <p style="text-align: center; margin-top: 20px;">VERSION: 05/08</p> <p style="font-size: 0.8em; margin-top: 20px;">Food Allergen Awareness – Version 05/08</p>	<p>WHAT ARE FOOD ALLERGENS?</p> <p>A food allergy is an immune system response to a food (usually a food protein) that the body mistakenly believes is harmful. Once the immune system decides that a particular food is harmful, it creates specific antibodies to it.</p> <p>The body's immune system normally reacts to the presence of toxins, bacteria or viruses by producing a chemical reaction to fight these invaders. However, sometimes the immune system reacts to ordinarily benign substances such as food or pollen, to which it has become sensitive. This overreaction can cause symptoms from the mild (hives) to the severe (anaphylactic shock) upon subsequent exposure to the substance. An actual food allergy, as opposed to simple intolerance due to the lack of digesting enzymes, is indicated by the production of antibodies to the food allergen, and by the release of histamines and other chemicals into the blood.</p> <p>These chemicals can trigger a cascade of allergic symptoms that can affect the respiratory system, gastrointestinal tract, skin, or cardiovascular system.</p>	<p>Many people worldwide suffer from true food allergies. At the present time, there is no cure for food allergy. Avoidance is the only way to prevent an allergic reaction.</p> <p>Although an individual could be allergic to any food, such as fruits, vegetables, and meats, they are not as common as the following eight foods which account for 90% of all food-allergic reactions:</p> <ul style="list-style-type: none"> Celery Cereals containing Gluten Crustaceans Fish Eggs Lupin Milk Molluscs Mustard Nuts Peanuts Sesame Seeds Seeds (other) Soybeans Sulphur dioxide and Sulphites at levels above 10mg/kg or 10mg/litre expressed as SO₂
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Figure 2b – Example of Internal literature developed from guidance (page 2)

Figure 2b – Example of Internal literature developed from guidance (page 2)

<p>FOOD ALLERGENS IN PASTA FOODS OPERATIONS</p> <p>Pasta Foods uses the following food materials on production sites:</p> <p>Durum Wheat is used as the main constituent ingredient of all milled wheat products and dried pasta products and therefore will be found in all milling, pasta manufacturing plant and associated equipment.</p> <p>Two wheat based raw materials are used for dried snack pellet production - Farigel Wheat (pregelatinised durum wheat semolina) and Wheat Rusk. These materials can be used in the manufacturing processes at the same time as any other raw materials. There is a small risk of carry-over contamination through the raw material tipping, silo storage, conveying, weighing, sieving and mixing systems, as well as line contamination but this risk is minimised by following the correct cleaning procedures.</p> <p>Egg is used in the form of whole pasteurized liquid egg and egg albumen powder in certain pasta products only. Liquid egg is delivered in chilled boxes which are labelled and segregated in secure storage. Egg</p> <p style="font-size: 0.8em; margin-top: 20px;">Food Allergen Awareness – Version 05/08</p>	<p>albumen is delivered in lined cardboard boxes and is labelled both by the supplier and by internal QA on arrival as an allergenic raw material.</p> <p>Egg production is restricted through the planning process to discreet production runs, followed by a 12-hour cleaning and sanitation process.</p> <p>Currently all egg pasta products are manufactured on Line 3. Snack production is not affected by egg raw materials and there is no risk of contamination by carry-over to the snack pellet processes.</p> <p>REDUCING THE RISKS IN MANUFACTURING</p> <p>There are a number of ways that risks of potential cross-contamination or carry-over can be reduced:</p> <ol style="list-style-type: none"> 1. Be extra careful when handling egg products. 2. Do not allow liquid egg to spill and clean up immediately if it does. 3. Do not allow egg albumen powder to become airborne. Ensure weighing is carried out in a controlled manner 4. Ensure all contact surfaces are cleaned and sanitised thoroughly after egg runs. 	<ol style="list-style-type: none"> 5. Remove all signs of egg pasta product throughout the line after egg production has stopped to avoid contaminating the next product. 6. Wheat is present throughout the Mill and Factory operations but additional care is taken with line cleaning procedures after manufacturing snack pellets containing wheat raw materials. <p>FOOD ALLERGEN AWARENESS – NUTS</p> <p>Although our manufacturing sites do not handle any raw materials containing nuts or nut derivatives, there can be nuts present in small quantities in the snack bars in this vending machine and food items brought in from outside the premises.</p> <p>Although risks may be very small, in order to ensure there is no risk of cross-contamination from hand contact when eating a snack bar and handling any food products or materials in the manufacturing/packing plants, please observe the current rules on thorough hand washing when returning to your work station after break periods.</p>
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4.4. Dissemination of the guidance

Manufacturers tend to hear about the guidance through a number of different channels.

Most commonly, they have made internet searches either directly through the FSA website or, more likely, via general search engines for information on allergens generally. As we have mentioned elsewhere in this report, some respondents felt that the route to information relating to allergens was not sufficiently obvious on the FSA website i.e. it was not clearly signposted from the homepage and the guidance didn't appear early in the list of searches when typing 'allergens' into the FSA search engine.

For many businesses (particularly micro businesses) their source of information was their TSO/EHO during the course of regular visits.

Other sources were (in order of mentions):

- Retailers they supply.
- The BRC.
- Work colleagues or friends from other like organisations.
- Food research organisations (that they have asked to help). This was more common among medium-large food manufacturers.
- Training sessions.

Many manufacturers think there is a role for TSOs and EHOs to tell businesses about the guidance and to encourage them to sign up to FSA email alerts.

Enforcement Officers were asked to suggest ways in which the dissemination of the guidance could be improved, both to themselves and to business. Overall, they were content with the current ways in which they personally receive the guidance, with very few suggestions for improvement emerging, but the following methods were cited:

- Mention at training sessions/seminars.
- Via FSA emails.
- On the FSA website (but promote it more effectively – often hard to find).
- Updates via EHC NET.
- Send hard copies to every EHO dept across the country.
- Via interactive DVDs (like HACCP).

They were, however, more forthcoming when it came to suggestions for optimising communications with businesses:

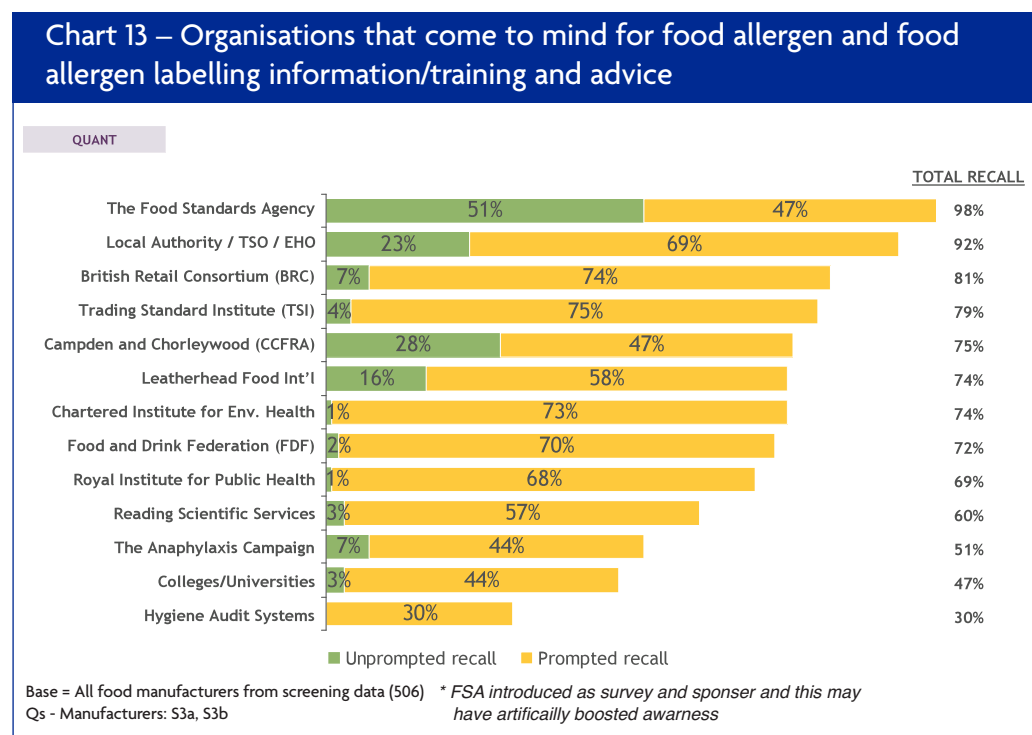
- Print the guidance in other languages (and use ethnic publishing groups).
- Send it to businesses directly/mailshots.
- Improve the navigation of the FSA website (some businesses had unsuccessfully searched for it after being advised to by the Enforcement Officer).
- Disseminate via trade organisations e.g. FDF, BRC etc.
- Place advertisements in trade magazines.
- Supply Enforcement Officers with more leaflets for distribution.

4.5. Perceptions of the FSA

Food manufacturers (aware of the guidance) were asked which organisations came to mind for food allergen and food allergen labelling information, training and advice (chart 13). This was asked unprompted and then prompted. The FSA was easily the most commonly recalled organisation with more than 50% spontaneously mentioning the Agency and almost all (98%) recalling it after a prompt. It should be borne in mind, however, that the FSA was introduced as the sponsor of this research which will have undoubtedly boosted the level of unprompted recall, so this percentage needs to be treated with caution.

The figures also show a high level of recall for the Local Authority/TSO/EHO as providers of this sort of information (23% mentioned this spontaneously and 92% after a prompt). This is even more the case amongst micro businesses which were less likely than other businesses to mention the FSA spontaneously (42%), and more likely to mention their LA/TSO/EHO (35%).

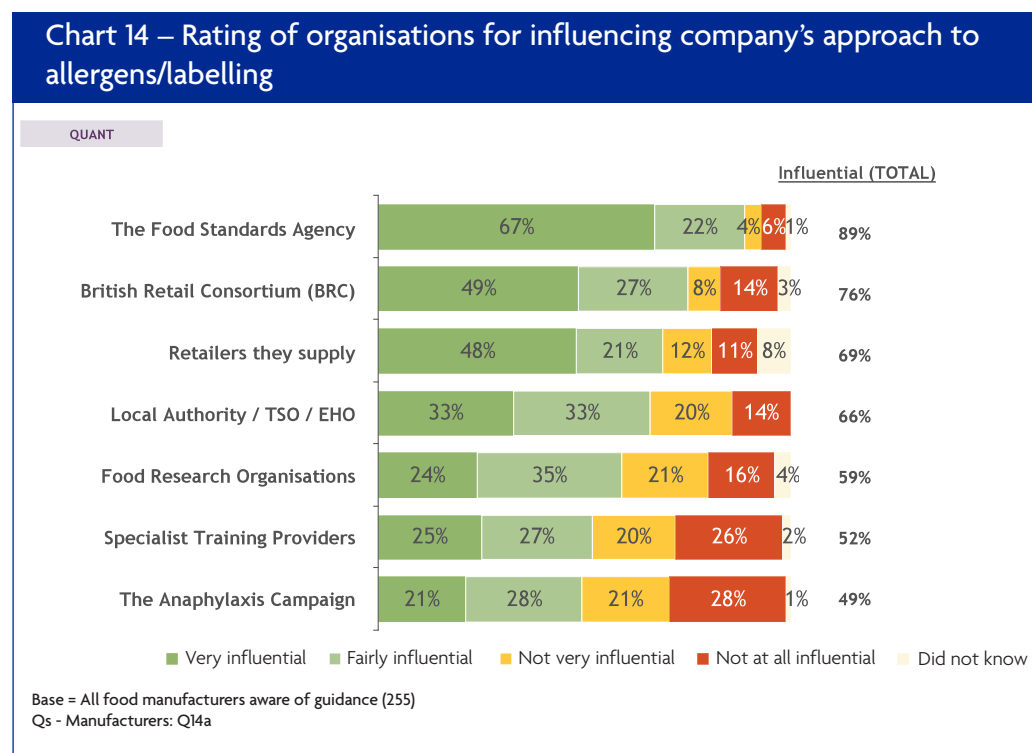
Most organisations included in this question received high prompted recall, but only one other organisation (Campden and Chorleywood) received a large number of spontaneous mentions. Over a quarter (28%) mentioned this organisation without prompting.



In terms of how influential different organisations are on this issue, the Food Standards Agency is seen as influential by almost nine in ten food manufacturers (89%). Three quarters rated the BRC as influential, while over two-thirds felt that suppliers were influential.

Although the FSA is overall the most influential organisation, micro businesses are more likely to cite their LA/TSO/EHO. Only 67% of micro businesses see the FSA as influential (compared with 90%+ for small/medium/large businesses), while 86% of micro businesses and 73% of small businesses see their local authority/TSO/ EHO as influential (compared with 60% for medium businesses and only 54% for large businesses).

Micro businesses are also much less likely to see the BRC and the Anaphylaxis Campaign as influential as their larger counterparts. 34% of micro businesses saw the BRC as influential (compared with 80%+ for small/medium/large businesses), while only 7% of micro businesses rated the Anaphylaxis Campaign as influential (compared with 50%+ for small/medium/large businesses).



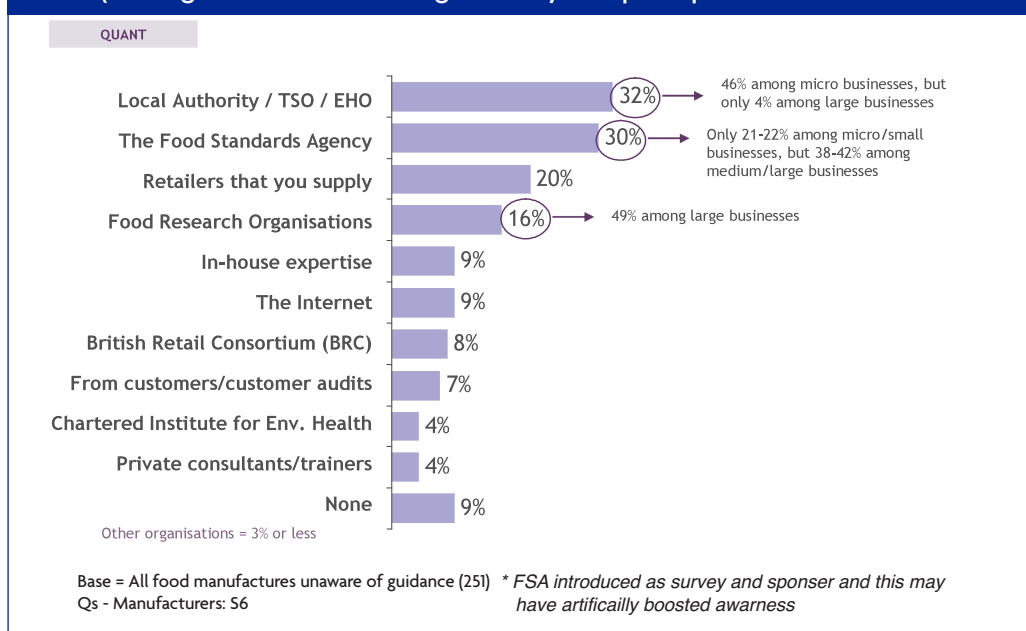
Respondents that were unaware of the guidance were asked which organisations they used in relation to food allergens and food allergens labelling advice (chart 15). Here the FSA was rated a very close second to the LA/TSO/EHO with scores for the FSA driven by larger businesses and scores for the LA driven by the smaller businesses.

The Food Standards Agency was used by just under a third of businesses unaware of the guidance (30%). This means that many will have been on the FSA website getting information about allergens, but not seen (or not recalling seeing) the guidance. A similar proportion (32%) use their local authority/EHO/TSO, rising to almost a half of micro businesses (46%).

Food research organisations are much more likely to be used by the larger manufacturers (49%) than other sized businesses.

9% of businesses unaware of the guidance are not using any organisations for information (equating to about 5% of all food manufacturing businesses).

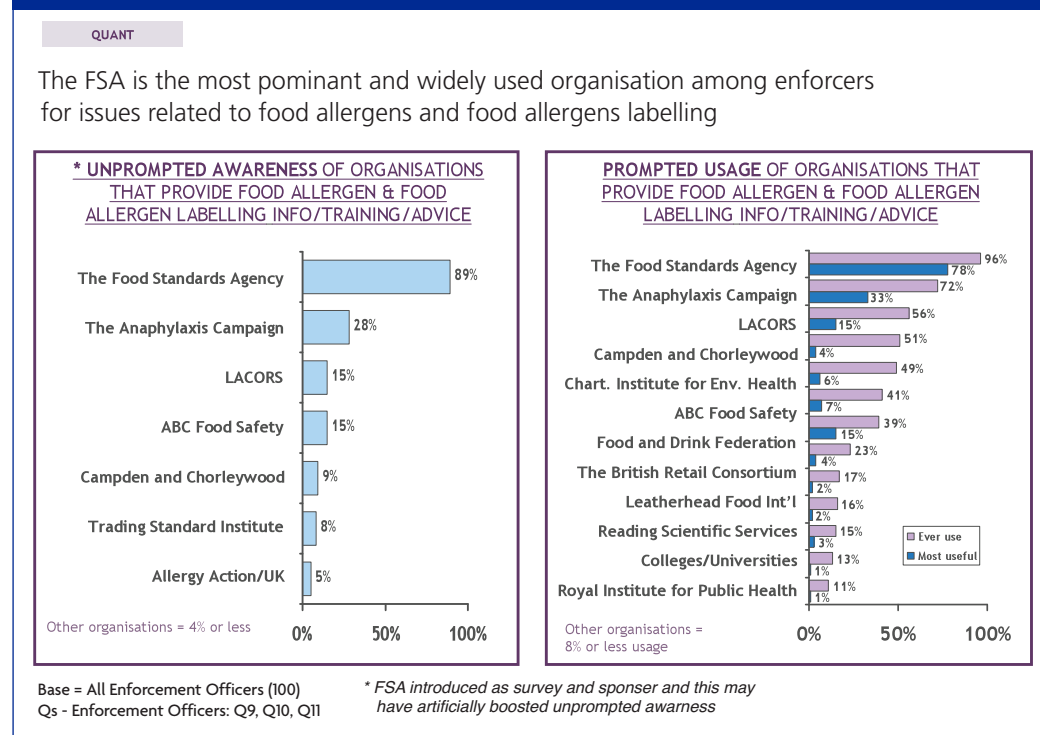
Chart 15 – Organisations used for food allergen & food allergen labelling info (among those unaware of guidance) – unprompted



When it comes to Enforcement Officers, the FSA is the most prominent, widely used and most useful organisation with regards to food allergens and food allergen labelling (chart 16). In summary:

- 89% spontaneously mentioned the Food Standards Agency as an organisation that provides information on this issue. Again, it should be borne in mind that the FSA was introduced as the sponsor of this research which undoubtedly will have boosted the level of unprompted recall, so this percentage needs to be treated with caution.
- 96% have used the Food Standards Agency for information on this issue (after being prompted).
- 78% rated the Food Standards Agency as most useful on this issue.

Chart 16 – Awareness and usage of organisations that provide food allergen and food allergen labelling info/training/advice amongst Enforcement Officers

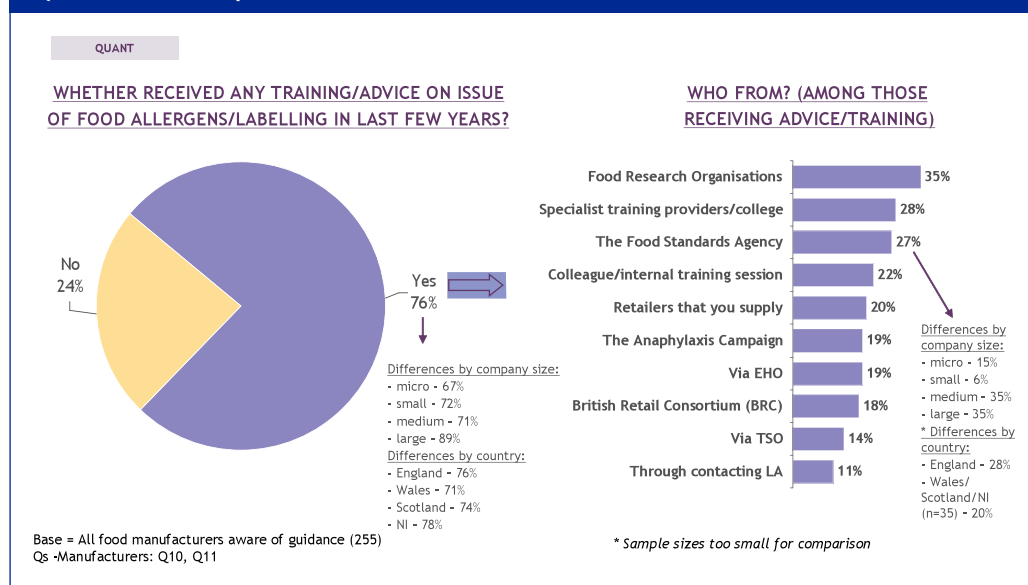


Over three quarters of the manufacturers taking part in the survey (76%) have received training or advice on allergens/allergen labelling in the last few years. The larger the company the more likely it was to have done so.

27% of these manufacturers (receiving training or advice) had received this training or advice from the FSA. This equates to 20% of all businesses who are aware of the guidance. Medium and large sized businesses were more likely to use the FSA for training/advice than small/micro businesses (probably due to increased awareness and the fact that the respondent was more specialised therefore training was deemed to be more relevant).

A third (35%) had received training or advice from a food research organisation, while a quarter (28%) had received training or advice from a specialist training provider.

Chart 17 – Training/advice on the issues in the last few years, and its source (manufacturers)



Enforcement Officers who took part in the quantitative study were asked whether they had received any training or feedback specifically about the guidance. In summary:

- 28% said they had received direct external training.
- 6% said they had received direct internal training.
- 16% reported they had received indirect feedback from colleagues who had attended external courses.

This equates to a total of 38% having had external or internal training or feedback from colleagues about the guidance.

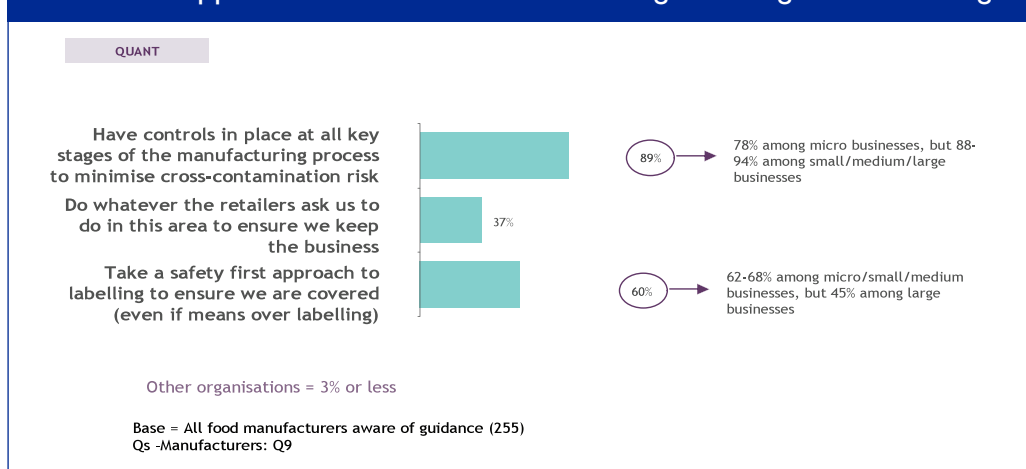
Of the 28% of Enforcement Officers (n=28) receiving direct external training, the majority (20 respondents) received this training via the FSA (4 via Hygiene Audit Systems and 2 via ClEH). Most received this training between 6 months and 2 years ago (26/28) and all but one found the training useful (19 'very useful' and 8 'fairly useful').

4.6. Approaches taken towards food allergen management/labelling

Manufacturers were asked what approaches they took towards food allergen management/labelling. They were read out three statements and were asked if each statement applied to them. As can be seen in chart 18 below:

- 89% agreed with the statement that they have controls in place at all key stages of the manufacturing process to minimise cross-contamination risk, although this was lower among micro businesses (78%) and higher among small/medium/large businesses (88-94%).
- 60% agreed that they take a safety first approach to labelling to ensure they are covered (even if this means over labelling). This is more likely to be the case amongst micro, small and medium sized manufacturers (62-68%) than the larger manufacturers (45%).
- 37% agreed that they do whatever the retailers ask them to do in this area to ensure they keep the business.

Chart 18 – Approaches taken towards food allergen management/labelling



On the question as to whether the guidance should become compulsory, almost two thirds of food manufacturers and Enforcement Officers agree that it should be (chart 19). Opinion is, however, more divided among micro businesses and large businesses (it is split roughly 50:50 for and against), for differing reasons.

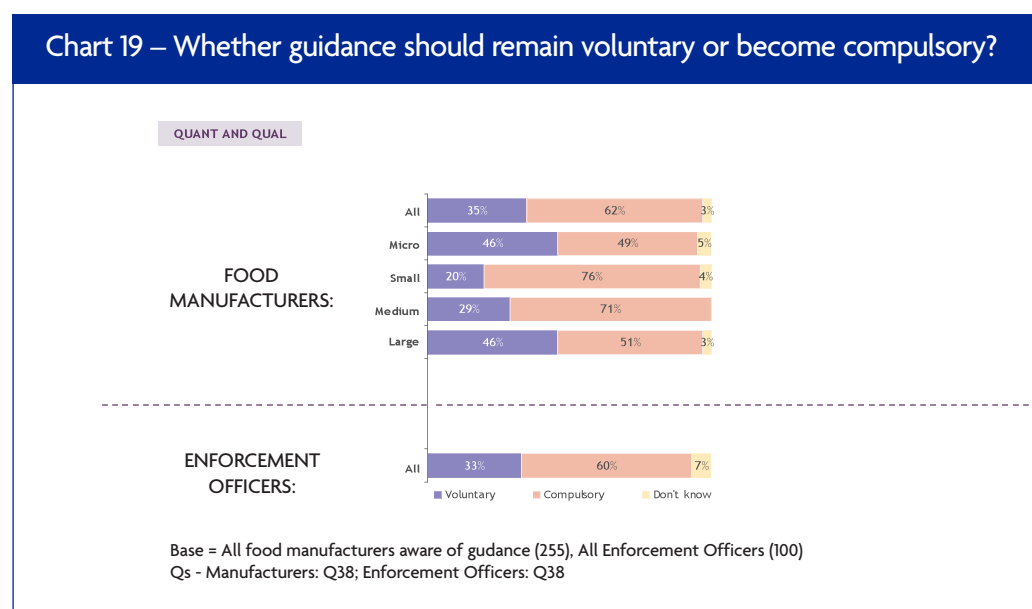
Evidence from the qualitative interviews is that micro businesses are keen to avoid making it compulsory because of the additional work involved for them:

*“I really hope they do not do that. I’ve got enough on my plate as it is.”
Micro manufacturer*

Whereas large businesses were more likely to be against it because they specialise in this area, and are therefore able to guarantee minimal risk, but also because they see regulations as unworkable:

“I can’t see how it could be made compulsory really as it is very hard to measure...and what about loose foods?” Large manufacturer

The qualitative interviews also suggest that many who think it should become compulsory would want this to be introduced in the medium to long term (rather than in the short term).



5. Summary, Conclusions and Recommendations

5.1. Summary of Findings

Guidance awareness and readership

Just over a half of the food manufacturers (53%) were aware of either the full guidance or the leaflet. 48% were aware of the full guidance, while 22% were aware of the leaflet (with some aware of both). Awareness of either was much higher among large businesses (81%) than 'micro' businesses, i.e. those with fewer than 20 employees (37%). Around a half of small-medium sized businesses, i.e. those with 20-249 employees were aware of the guidance.

Most manufacturers became aware of the guidance either through internet searches on 'allergens' leading to the guidance on the FSA website or, particularly in the case of smaller organisations, through their EHO or TSO.

Over three quarters of Enforcement Officers (78%) were aware of the full guidance or the leaflet. Over a quarter (of those aware) had been told about it or given it at a training course. A similar number had been sent an email alert by the FSA, and 23% had found it on the FSA website (when looking for information on allergens generally).

Awareness amongst retailers was mixed, whilst most training bodies were aware.

Once manufacturers and Enforcement Officers became aware of the guidance this almost always converted into access (i.e. read on Internet/order hard copy), and then readership. Very few become aware of it and then do nothing. Manufacturers were more likely to read the guidance in detail than Enforcement Officers.

Opinion of the guidance

Opinion of the guidance was very positive, with 100% of manufacturers rating the full guidance as useful, while 74% did the same for the leaflet. Most of those that did not rate the leaflet as useful, rated the full guidance as useful, i.e. the leaflet was not aimed at them and they were fine with this as they used the full guidance instead.

In addition, those manufacturers unaware of the guidance thought it would be useful. These respondents were read a short description of the guidance and asked to say how useful they thought it would be. 83% thought it would very or fairly useful.

Over 80% of Enforcement Officers felt the full guidance and the leaflet were useful to both themselves and the businesses they work with. Indeed 96% of Enforcement

Officers rated the leaflet as useful for themselves (mainly as an aide memoir) and 88% rated the full guidance as useful for the businesses they deal with.

Both documents were rated well on attributes relating to ease of reading, navigation and layout but showed some relative weakness in terms of relevance, ease of application and offering practical solutions (although negative scores were very low). It was apparent, however, that many were frustrated that the guidance wasn't updated more regularly (evidenced by the fact that only 12 foods out of 14 were included i.e. lupins and molluscs were missing). This can undermine its usefulness as some people think it is out of date and therefore of less value. A few manufacturers and Enforcement Officers thought there needed to be something that was longer than the leaflet but shorter than the full guidance.

Usage and impact of the guidance

Over 90% of Enforcement Officers who have accessed the guidance are actually using it, either to inform their own approach to the issue or in their communications with businesses. The full guidance is mainly used to formulate their own approach to the issue, while the leaflet is used to hand out to local businesses and also as a guide i.e. to show specific pages/sections to businesses.

Manufacturers also told us that both the leaflet and particularly the full guidance have had a large impact on their business. Reading the documents had led to most businesses doing something as a result, ranging from checking their current procedures to fundamental changes to the way they tackle allergens and allergens labelling.

Dissemination of the guidance

Most manufacturers accessed the guidance through a general internet search (for allergens) leading them to guidance on the FSA website. However, micro businesses were more likely to cite their TSO/EHO as making them aware of the guidance. Other sources included: retailers they supply, the BRC, work colleagues or friends from other like organisations, food research organisations (that they've asked to help) and training sessions (the last two were more common among medium and large sized businesses). Many manufacturers think there is a role for TSOs and EHOs to tell businesses about the guidance and to encourage them to sign up to FSA email alerts (so they get to hear earlier and not reliant on the next EHO/TSO visit).

Enforcement Officers were asked to suggest ways in which the dissemination of the guidance could be improved, both to themselves and to business. Overall, they were content with the current ways in which they personally receive the guidance, with very few suggestions for improvement emerging. They were, however, more forthcoming when it came to suggestions for optimising communications with businesses. The following were cited: print the guidance in other languages (and use ethnic publishing groups), send it to businesses directly/mailshots, improve the navigation of the FSA website (some businesses had unsuccessfully searched for it after being advised to by the Enforcement

Officers), disseminate via trade organisations e.g. FDF, BRC, place advertisements in trade magazines and supply Enforcement Officers with more leaflets for distribution.

Perceptions of the FSA

Amongst manufacturers, the FSA was by far the most easily recalled and influential organisation when thinking of bodies involved in food allergen and food allergen labelling. The FSA was followed by the Local Authority/TSO/EHO, which had a higher level of recall among micro businesses. Results were similar among Enforcement Officers with the FSA the most prominent, widely used and most useful organisation that they are aware of in relation to the topic at hand.

76% of the manufacturers taking part in the survey had received training or advice on allergens/allergen labelling in the last few years. 27% of these manufacturers had received this training or advice from the FSA, whilst 35% and 28% respectively received it from food research organisations or specialist training providers.

A total of 38% of Enforcement Officers have had external or internal training or feedback from colleagues about the guidance. Of the 28% of Enforcement Officers (n=28) receiving direct external training, the majority (20) received this training via the FSA (4 via Hygiene Audit Systems, 2 via CIEH).

Legal Status

On the question of whether the guidance should remain voluntary guidance or become compulsory, almost two thirds of both Enforcement Officers and manufacturers felt that it should become compulsory. The picture is less clear cut amongst the large and the micro businesses, where opinion is split approximately 50:50, for and against (but often for different reasons). Micro businesses are concerned about the additional burden, while large businesses are more likely to think the regulations would be unworkable.

The qualitative interviews suggested that many of those who think it should become compulsory would want this to be introduced in the medium to long term (rather than in the short term).

5.2. Conclusions

We feel the key conclusions that should be drawn from this research are as follows:

Awareness of the guidance is mixed with just over half of businesses and three quarters of Enforcement Officers aware of the full guidance or leaflet. However, awareness is lower among micro businesses i.e. those with fewer than 20 employees (37%). Awareness among food manufacturers is typically driven by Internet searches on allergens or via the EHO / TSO.

Once businesses and Enforcement Officers become aware of the guidance they almost always access it, read it and (in most cases) use it. Opinions of the leaflet and full guidance are very positive:

- It is generally seen as useful.
- The full guidance is seen as comprehensive, easy to read and concise. However it is rated slightly less positively for being easy to apply and offering practical solutions.
- The leaflet is seen as a good starting point for some and for providing all information needed for others.

The evidence from this research is that most businesses are using the guidance extensively. This is either to check the procedures they have in place are up-to-date or, in quite a number of cases, to completely revamp their procedures. Enforcement Officers are often using the full guidance to inform their own advice/thinking and using the leaflet as a 'leave behind' (or a reminder of points to cover).

5.3. Recommendations

It is clear that the guidance is appreciated and used by almost all those who are aware it. However, 47% of manufacturers and 22% of Enforcement Officers in this survey were unaware of it (furthermore, the majority of those unaware reported that it sounded useful).

The first recommendation would therefore be to take steps to increase awareness by:

- Further promotions in the trade press.
- Further promotions through the BRC and its network.
- Improving the FSA search engine so that allergens comes higher up the list of searches.
- Having a direct and visible link from the FSA home page to the relevant section.
- Sending more leaflets to Enforcement Officers.
- Publishing at least the leaflet in the main non-English languages.

Although respondents struggled to come up with many suggestions for improvement, there was clearly some appetite to see some changes to the guidance itself:

- Include more practical examples of how recommendations can be applied to the workplace (possibly as links to other sections of the FSA website in order to keep the guidance reasonably concise).
- Produce a version that is more detailed than the leaflet but shorter than the full guidance.
- Ensure that it is kept up to date so that it appears more relevant.

Appendix 1 – Questionnaires

Jigsaw Research, 13-14 Margaret Street, London, W1W 8RN

26/9/2008

99668

– FOOD STANDARDS AGENCY –
FOOD SAFETY MANAGEMENT QUESTIONNAIRE
FOOD MANUFACTURERS

Interviewer Name: _____ I.D. No. _____

Respondent Name: _____

Business Name and Address: _____

Postcode: _____ Telephone No: _____

INTERVIEWER DECLARATION

I declare that this interview has been conducted strictly in accordance with your specifications within the MRS Code of Conduct and with a person totally unknown to me.

Signed (INTERVIEWER): _____ Date _____

INTRODUCTION

Good morning/afternoon. My name is _____, from a company called Critical Research. We are conducting a survey on behalf of the Food Standards Agency among businesses who manufacture pre-packed food to find out how they handle food allergens and food allergens labelling.

Ask to speak to person fully or at least partly responsible for the business's handling of food allergens within the business.

Your answers will be treated in confidence and not reported back in a way that identifies you by name. Your answers will be put together with those from many other businesses to give an overall picture

No-one will try to sell you anything as a direct result of this survey, and the survey is not designed to test your knowledge, but to gauge your opinions.

NEED TO KEEP RECORD OF NUMBER OF PEOPLE UNABLE TO CONDUCT INTERVIEW DUE TO LANGUAGE DIFFICULTIES

CODE WHETHER SAMPLE TAKEN FROM FREE-FOUND LISTS OR SUPPLIED BY FSA AS BUSINESS THAT ORDERED BOOKLET - SINGLE CODE

FREE-FOUND SAMPLE1
 FSA SAMPLE.....2

SCREENING QUESTIONS

S1 Can I just check that your business manufactures pre-packed food and that you need to consider issues related to food allergens, cross contamination and food allergens labelling? **SINGLE CODE**

Yes.1 **CONTINUE**
 No2 **CLOSE**

S2a And can I just check that you are the person fully or at least partly responsible for the business's handling of food allergens within the business? **SINGLE CODE**

Yes1 **CONTINUE**
 No2 **ASK TO SPEAK TO RELEVANT PERSON**

IF LARGE BUSINESS AND RESPONDENT SEEMS HESITANT AND MAKES IT CLEAR THAT MORE THAN ONE PERSON HANDLES THIS ROLE, THEN READ OUT THE FOLLOWING (OTHERS SKIP TO S3a)

For a few large businesses we have interviewed so far, issues related to food allergens, cross contamination and food allergens labelling are managed by more than one person. In this interview we will be covering the following areas:

- The systems or procedures you have in place with regards to the management of food allergens, cross contamination and food labelling
- Any training or advice you may have received on this issue
- Your opinion on the different organisations that specialise in this area
- Your views on a Food Standards Agency publication called voluntary Guidance on Allergen Management and Consumer Information.

Do you think you would be to answer the questions in this survey or would you need to consult with any other colleagues beforehand? We could email you a PDF version of the questionnaire and the phone you back at a later date once you have consulted with your colleagues? (IF RESPONDENT WOULD PREFER TO COMPLETE QUESTIONNAIRE AND POST BACK – THIS IS FINE ALTHOUGH WE SHOULD TRY AND KEEP THESE TO A MINIMUM)

S3a When thinking about organisations providing information, advice or training about food allergens and food allergens labelling, which ones come to mind? **DO NOT READ OUT - MULTICODE**

S3b And which of the following organisations are you aware of that provide information, advice or training about food allergens and food allergens labelling? **READ OUT - MULTICODE – ROTATE ORDER**

	S3a	S3b
The Food Standards Agency	1.....	1
Your local authority / Trading Standards Officers / Environmental Health Officers	2.....	2
The British Retail Consortium (BRC)	3.....	3
Leatherhead Food International	4.....	4
Campden and Chorleywood Food Research Association (CCFRA)	5.....	5
Hygiene Audit Systems	6.....	6
The Chartered Institute for Environmental Health (CIEH)	7.....	7
The Royal Institute for Public Health	8.....	8
Reading Scientific Services	9.....	9
Trading Standards Institute (TSI)	10.....	10
Food and Drink Federation (FDF)	11.....	11
The Anaphylaxis Campaign	12.....	12
Colleges / Universities	13.....	13
None	14.....	14
Do not know	15.....	15
Other (specify)	16	

S4a In 2006, the Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information, which is best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). This full guidance was also accompanied by a leaflet. If you go to the following webpage: www.critical.co.uk/guidance you will be able to see what the full guidance, its contents page and the leaflet look like.

IF UNABLE TO ACCESS LINK SAY: The full guidance is a 50 page A4 booklet with an orange and white front, while the leaflet is much smaller and of a jar with an orange label on the front

Are you aware of either of these documents? **SINGLE CODE**

Yes, aware of full guidance only	1	ELIGIBLE – SKIP TO SECTION 1
Yes, aware of leaflet only	2	ELIGIBLE – SKIP TO SECTION 1
Yes, aware of both	3	ELIGIBLE – ASK S4b
No, not aware of either	4	ASK S5 THEN CLOSE
Do not know / can't remember	5	ASK S5 THEN CLOSE

- S4b Do you think you are more familiar with the full guidance or the leaflet? SINGLE CODE
- | | | |
|---------------------|---|-------------------|
| Full guidance | 1 | SKIP TO SECTION 1 |
| Leaflet | 2 | SKIP TO SECTION 1 |
- S5 How useful do you think it would have been to have had access to these documents over the last 2 years? Do you think it would have been...**SINGLE CODE – IF NECESSARY RE-READ DESCRIPTION OF GUIDANCE FROM S4**
- | | |
|-------------------------------------|---|
| Very useful | 1 |
| Fairly useful | 2 |
| Not very useful | 3 |
| Not at all useful | 4 |
| Do not know (DO NOT READ OUT) | 5 |
- S6 From who do you tend to get your information about food allergens and food allergens labelling? DO NOT READ OUT - SINGLE CODE
- | | |
|--|----|
| The Food Standards Agency | 1 |
| Your local authority / Trading Standards Officers /
Environmental Health Officers | 2 |
| The British Retail Consortium (BRC) | 3 |
| The retailer/s that you supply | 4 |
| Food Research Organisations e.g. Leatherhead, Campden | 5 |
| Hygiene Audit Systems | 6 |
| The Royal Institute for Public Health | 7 |
| The Chartered Institute for Environmental Health /
Trading Standards Institute | 8 |
| Food and Drink Federation (FDF) | 9 |
| The Anaphylaxis Campaign | 10 |
| Colleges / Universities | 11 |
| In-house expertise | 12 |
| From customers / Customer audits | 13 |
| The Internet | 14 |
| None – do not get information | 15 |
| Other (specify) | 16 |

SECTION 1 – RESPONDENT/BUSINESS PROFILE

Say: Before I ask you questions about how you handle issues related to food allergies and labelling, I'd like to ask you a few questions about your role within the organisation and the organisation itself.

Q1 What is your job title? **SINGLE CODE**

Proprietor/owner	1
Manager	2
Labelling Standards Manager / Director	3
Technical Manager / Director	4
Legal Compliance Manager	5
Quality (Assurance/Control/Issues) Manager	6
Other (specify)	6

Q2 And for how long have you been the person fully or at least partly responsible for the business's handling of food allergens within the business? **SINGLE CODE**

	Q2
Under 1 year	1
1 - 2 years	2
3 – 4 years	3
5 – 9 years	4
10 years or longer	5
Do not know	6

Q3 How many different premises does your business have in total that manufacture food? **SINGLE CODE**

	Q3
1 only	1
2	2
3	3
4	4
5 or more	5
Do not know	6

Q4 Approximately how many employees work for the organisation? **SINGLE CODE**

1 employee	1
2-5 employees	2
6-10 employees	3
11-20 employees	4
21-49 employees	5
50-249 employees	6
250 or more employees	7
Do not know	8

Q5 LOCATION OF HEAD OFFICE - SINGLE CODE – DO NOT NEED TO ASK – CODE FROM SAMPLE

North East	1
North West	2
East Midlands	3
West Midlands	4
East of England	5
South East (excluding Greater London)	6
Greater London	7
South West	8
Yorks/Humber	9
Scotland	10
Wales	11
Northern Ireland	12

Q6a What types of food do you produce? WRITE IN

Q6b And do you sell your food ...READ OUT AND MULTICODE

Direct to the general public	1
To retailers	2
To other food manufacturers	3
Other (specify)	4

IF SELL THROUGH RETAILERS (CODES 2 AT Q6b), ASK Q6c

Q6c Approximately how many different retailers do you supply your food products to? SINGLE CODE – NOTE FOR INTERVIEWER, WE WANT TO KNOW HOW MANY DIFFERENT ACTUAL RETAILERS SUPPLIED NOT NUMBER OF DIFFERENT BRANCHES (E.G. 50 BRANCHES OF TESCO = 1 RETAILER)

1	1
2	2
3 - 5	3
More than 5	4
Do not know	5

Q6d Which of the following ingredients, if any, do you ever use in any of your food products? **READ OUT -MULTICODE**

Cereals containing gluten such as wheat, rye, barley, oats, spelt, kamut1
Crustaceans (e.g. prawns, crab, Lobster)2
Molluscs (e.g. mussels, squid, snails)3
Egg4
Fish5
Lupin6
Peanuts7
Milk8
Nuts (if necessary: including almond, hazelnut, walnut, cashew, pecan nut, brazil nut, pistachio nut, macadamia nut, Queensland nut9
Soya10
Sesame11
Celery and or celeriac12
Mustard13
Sulphur dioxide/sulphites14
None of the above (DO NOT READ OUT)15

SECTION 2 – SYSTEMS OR PROCEDURES USED

Q7 What systems or procedures, if any, do you have in place with regards to the management of food allergens and cross contamination? WRITE IN

Q8 And what is your general approach or policy towards food allergen labelling? WRITE IN

Q9 Which of the following statements, if any, do you think apply to the way you approach this issue? **READ OUT - MULTICODE**

You have controls in place at all key stages of the manufacturing process to ensure the risk of cross-contamination is minimised ... 1

You do whatever the retailers ask you to do in this area to ensure you keep their business 2

You take a safety first approach to food labelling to ensure you are covered for any eventuality even it means over-labelling 3

None of the above (DO NOT READ OUT) 4

Q10 Have you received any training or advice on the issue of food allergens and food allergens labelling in the last few years?

Yes 1

No 2

CONTINUE

SKIP TO Q14a

Q11 Who has provided this training or advice? **READ OUT AND MULTICODE**

- A colleague or through an internal training session1
- Via a specialist training provider2
- Through a Trading Standards Officer3
- Through an Environmental Health Officer4
- Through contacting your local authority/council5
- Via the Food Standards Agency6
- Via the British Retail Consortium (BRC)7
- Food Research Organisations e.g. Leatherhead, Campden8
- The Anaphylaxis Campaign9
- Through talking to the retailers that you supply10
- Other (specify)11

ASK ALL

Q14a. I am going to read out some similar organisations. For each organisation I read out I'd like you to tell me how influential you think that organisation has been in moulding or changing your approach to food allergens and food allergens labelling. Again, I'd like you to rate each organisation on a scale of 1-5 where 5 means you think they've been 'very influential' and 1 means you think they've been 'not at all influential'.

So with regards to moulding or changing your organisation's approach to food allergens and food allergens labelling, how influential would you say (READ OUT FIRST ORGANISATION) has been? **REPEAT FOR ALL ORGANISATIONS – ROTATE ORDER**

Not at all Very
influential influential

- The Food Standards Agency12345
- Your local authority / Trading Standards Officers /
Environmental Health Officers12345
- The British Retail Consortium (BRC)12345
- The retailer/s that you supply12345
- Food Research Organisations e.g. Leatherhead, Campden12345
- Anaphylaxis Campaign/Allergy UK/Coelic UK12345

SECTION 3 – THE LEAFLET

ASK QUESTIONS IN SECTION 3 IF MOST AWARE OF THE LEAFLET AT S4a (CODES 2) OR AT S4b (CODE 2)

Q15 You mentioned at the beginning of the interview that you were aware of the leaflet. When did you first become aware of it? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months. 1
- 4-6 months ago. 2
- 7-12 months ago 3
- 1-1 ½ years ago 4
- 1 ½ to 2 years ago 5
- Do not know / can't remember (DO NOT READ OUT) 6

Q16 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY -**

POSSIBLE MULTICODE

- Found on FSA website 1
- Told/Given to by TSO/EHO. 2
- Told/Given to at training session 3
- Told/Given to by retailer 4
- Told/Given to by BRC 5
- Told/Given to by work colleague. 6
- Told/Given by Food Research Organisations e.g.
Leatherhead, Campden. 8
- Other (specify) 9
- Do not know / can't remember (DO NOT READ OUT) 10

Q17 In addition to being aware of it, did you...**READ OUT - POSSIBLE MULTICODE**

- Receive a hard copy in-person or in the post that you specifically requested 1 SKIP TO Q19a
- Receive a hard copy in-person or in the post that you didn't specifically request 2 SKIP TO Q19a
- Read it on the Internet. 3 SKIP TO Q19a
- Read it after printing it out from the Internet. 4 SKIP TO Q19a
- None – didn't receive it or view online 4 CONTINUE

Q18 Which of the following best describes why you haven't received it or read it online? **READ OUT -**

MULTICODE

- You didn't know how to get it. 1
- You were confident that the systems you had in place were adequate. 2
- You thought the leaflet was too brief to be of any use. 3
- Only been in the role for a short period. 4
- Other (specify) 7
- Do not know / can't remember (DO NOT READ OUT) 8

ASK Q19a IF RECEIVED A COPY OF LEAFLET (CODES 1-3 AT Q17), OTHERS SKIP TO SECTION 4

Q19a And which of the following best describes how much of the leaflet you read? **READ OUT AND SINGLE CODE**

- | | | |
|---|---|-------------------|
| You read all of it..... | 1 | SKIP TO Q20 |
| You read some of it..... | 2 | SKIP TO Q20 |
| You only skimmed through it..... | 3 | SKIP TO Q20 |
| You didn't read it at all..... | 4 | CONTINUE |
| Do not know / can't remember (DO NOT READ OUT)..... | 5 | SKIP TO SECTION 4 |

Q19b Why didn't you read it at all? **WRITE IN**

ASK Q20 IF READ LEAFLET (CODES 1-4 AT Q19a), OTHERS SKIP TO SECTION 4

Q20 And how useful did you find the leaflet? Would you say it was...**READ OUT AND SINGLE CODE**

- | | | |
|---|---|--------------|
| Very useful..... | 1 | CONTINUE |
| Fairly useful..... | 2 | CONTINUE |
| Not very useful..... | 3 | CONTINUE |
| Not at all useful..... | 4 | CONTINUE |
| Do not know / can't remember (DO NOT READ OUT)..... | 5 | SKIP TO Q21b |

Q21a Why do you say that? **WRITE IN**

Q21b What changes, if any, did you make to the way you manage food allergens and food allergen labelling as a result of reading leaflet? **WRITE IN**

Q22. I'd now like you to rate different attributes of the leaflet as very good, good, adequate, poor or very poor. So firstly, how would you rate the leaflet for being: **(READ OUT FIRST ATTRIBUTE)? REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER**

		Very Poor	Poor	Adequate	Good	Very good
Easy to read / well laid out	1	2	3	4	5	
A good starting point to the whole issue of food allergen management	1	2	3	4	5	
Providing you with all the information you needed	1	2	3	4	5	
Easy to apply to our business procedures	1	2	3	4	5	
Offering practical solutions	1	2	3	4	5	

Q23 Did you know that a more detailed guidance on allergen management was available? **SINGLE CODE**

Yes	1	CONTINUE
No	2	SKIP TO SECTION 4
Do not know / can't remember	3	SKIP TO SECTION 4

Q24 And which of the following best describes what you did as a result of being aware of this? **READ OUT AND SINGLE CODE**

You decided to read the fuller guidance.....	1	SKIP TO SECTION 4
You decided not to read the fuller guidance.....	2	CONTINUE
Do not know / can't remember (DO NOT READ OUT)	3	SKIP TO SECTION 4

ASK Q25 IF DECIDED NOT TO READ THE FULLER GUIDANCE (CODE 3 AT Q24)

Q25 Why did you decide not to read the fuller guidance? **SINGLE CODE**

SECTION 4 – THE FULL GUIDANCE

ASK QUESTIONS IN SECTION 4 IF MOST AWARE OF THE GUIDANCE AT S4 (CODES 1) OR AT S4b (CODE 1), OTHERS SKIP TO SECTION 5

Say: I'd now like to ask you some questions about the full guidance.

Q26 You mentioned at the beginning of the interview that you were aware of the full guidance. When did you first become aware of it? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months..... 1
- 4-6 months ago..... 2
- 7-12 months ago..... 3
- 1-1 ½ years ago 4
- 1 ½ to 2 years ago 5
- Do not know / can't remember (DO NOT READ OUT) 6

Q27 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY - POSSIBLE MULTICODE**

- Found on FSA website 1
- Via leaflet 2
- Told/Given by TSO/EHO..... 3
- Told/Given at training session..... 4
- Told/Given by retailer 5
- Told/Given by BRC 6
- Told/Given by work colleague 7
- Told/Given by Food Research Organisations e.g. Leatherhead, Campden..... 8
- Other (specify) 9
- Do not know / can't remember (DO NOT READ OUT) 10

Q28 In addition to being aware of it, did you...**READ OUT - POSSIBLE MULTICODE**

- Receive a hard copy in-person or in the post that you specifically requested..... 1 SKIP TO Q30a
- Receive a hard copy in-person or in the post that you didn't specifically request..... 2 SKIP TO Q30a
- Read it on the Internet..... 3 SKIP TO Q30a
- Read it after printing it out from the Internet..... 4 SKIP TO Q30a
- None – didn't receive it or view online 5 CONTINUE

Q29 Which of the following best describes why you haven't received it or read it online?

READ OUT - MULTICODE

- You didn't know how to get it 1
- You were confident that the systems you had in place were adequate. 2
- You thought the full guidance was too detailed for your business .. 3
- Only been in the role for a short period..... 4
- Other (specify) 5
- Do not know / can't remember (DO NOT READ OUT) 6

ASK Q30a IF RECEIVED A COPY OF FULL GUIDANCE (CODES 1-4 AT Q28), OTHERS SKIP TO SECTION 5

Q30a And which of the following best describes how much of the guidance you read? **READ OUT AND SINGLE CODE**

- | | |
|--|-------------------|
| You read all of it..... 1 | SKIP TO Q31 |
| You read some of it..... 2 | SKIP TO Q31 |
| You only skimmed through it..... 3 | SKIP TO Q31 |
| You didn't read it at all..... 4 | CONTINUE |
| Do not know / can't remember (DO NOT READ OUT) 5 | SKIP TO SECTION 5 |

Q30b Why didn't you read it at all? **WRITE IN**

ASK Q31 IF READ BOOKLET (CODES 1-3 AT Q30a), OTHERS SKIP TO SECTION 5

Q31 And how useful did you find the full guidance? Would you say it was...**READ OUT AND SINGLE CODE**

- | | |
|--|--------------|
| Very useful..... 1 | CONTINUE |
| Fairly useful..... 2 | CONTINUE |
| Not very useful..... 3 | CONTINUE |
| Not at all useful..... 4 | CONTINUE |
| Do not know / can't remember (DO NOT READ OUT) 5 | SKIP TO Q32b |

Q32a Why do you say that? **WRITE IN**

Q32b What changes, if any, did you make to the way you manage food allergens and food allergen labelling as a result of reading the guidance? **WRITE IN**

IF NO CHANGES MADE AT Q32a, ASK Q32b

Q32c And did you do anything as a result of reading the full guidance? E.g. check your current procedures were complete, pass onto a colleague etc. **WRITE IN**

Q33. Are you planning to make any changes in the future as a result of reading the full guidance?
SINGLE CODE

- | | | |
|-------------------|---|-------------|
| Yes | 1 | CONTINUE |
| No | 2 | SKIP TO Q35 |
| Do not know | 3 | SKIP TO Q35 |

Q34. What changes are you planning to make? **WRITE IN**

Q35. I'd now like you to rate some different attributes of the full guidance as very good, good, adequate, poor or very poor. So firstly, how would you rate the full guidance for: (READ OUT FIRST ATTRIBUTE)? REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER

	Very Poor	Poor	Adequate	Good	Very good
Being easy to read / well laid out	1	2	3	4	5
Being comprehensive	1	2	3	4	5
Being aimed at businesses like yours	1	2	3	4	5
Providing tools or suggestions that you were able to implement within the business	1	2	3	4	5
Being easy to navigate and find the sections relevant to you	1	2	3	4	5
Easy to apply to our business procedures	1	2	3	4	5
Offering practical solutions	1	2	3	4	5
Being a good reference point should I have any issues in the future	1	2	3	4	5
Being as concise as possible	1	2	3	4	5

Q36a What, if anything, did you like about the full guidance? Which sections did you find helpful?

WRITE IN

Q36b And what, if anything, didn't you like about the full guidance? Which sections did you not find helpful? **WRITE IN**

Q36c In order for the FSA to provide you with all the relevant information you need, what improvements or changes would you suggest they make to the full guidance? **WRITE IN**

SECTION 5 – OTHER ISSUES

ASK ALL

Q38. Do you think in the future the guidance on allergen management should...

READ OUT – SINGLE CODE

- Remain voluntary 'best practice' 1
- Or, become compulsory legislation..... 2
- Do not know 3

ASK ALL

Q39. And finally, would you be willing to take part in a follow-up telephone interview if we wanted to re-contact you and ask you a few more questions in a bit more depth? **SINGLE CODE**

- Yes 1
- No 2

Jigsaw Research, 13-14 Margaret Street, London, W1W 8RN

26/9/2008

99668
– FOOD STANDARDS AGENCY –
FOOD ENFORCERS

Interviewer Name: _____ I.D. No. _____

Respondent Name: _____

Business Name and Address: _____

Postcode: _____ Telephone No: _____

INTERVIEWER DECLARATION

I declare that this interview has been conducted strictly in accordance with your specifications within the MRS Code of Conduct and with a person totally unknown to me.

Signed (INTERVIEWER): _____ Date _____

INTRODUCTION

Good morning/afternoon. My name is _____, from a company called Critical Research. We are conducting a survey on behalf of the Food Standards Agency among trading standards officers and environmental health officers who have some responsibility for checking how local businesses handle food allergens and food allergen labelling for **pre-packed** food.

(Once through) We're conducting research on behalf of the Food Standards Agency. Can I just double-check that you have some responsibility for checking how local food manufacturers handle food allergens and food allergen labelling for **pre-packed** food (not just loose foods) i.e. do any of the businesses that you cover fall into that category?

IF NOT – ASK TO SPEAK TO SOMEONE WHO DOES

Your answers will be treated in confidence and not reported back in a way that identifies you by name. Your answers will be put together with those from many other local authorities to give an overall picture.

SECTION 1 – RESPONDENT/LA PROFILE

Say: Before I ask you questions about how you handle issues related to food allergies and labelling, I'd like to ask you a few questions about your role within (READ OUT NAME OF LOCAL AUTHORITY).

- Q1 What is your job title? **SINGLE CODE**
- Environmental Health Officer1
 - Trading Standards Officer2
 - Principal Environmental Health Officer3
 - Food Officer / Food Safety Officer / Food Safety Standards Officer4
 - Team Leader for Food & Health5
 - Team Leader for Trading Standards6
 - Other (specify)3

Jon – might need question findings out whether they handle cross-contamination or labelling or both; and question establishing whether they are an EHO or TSO (if their job title doesn't give it away!)

- Q2a And for how long have you worked for your local authority? **DO NOT READ OUT - SINGLE CODE**

- Q2b And for how long have you been responsible for checking how local food manufacturers handle food allergens and food allergen labelling for pre-packed food? **DO NOT READ OUT - SINGLE CODE**

	Q2a	Q2b
Under 1 year	1.....1	1.....1
1 - 2 years	2.....2	2.....2
3 – 4 years	3.....3	3.....3
5 – 9 years	4.....4	4.....4
10 years or longer	5.....5	5.....5
Do not know	6.....6	6.....6

- Q3a Approximately how many food manufacturers are there in your area that you personally check for how they handle food allergens and food allergen labelling for pre-packed food? **DO NOT READ OUT - SINGLE CODE**

Less than 5	1
5-9	2
10-19	3
20 or more	4
Do not know	5

Q3b Thinking about the food manufacturers in your area that you personally check for how they handle food allergens and food allergen labelling for pre-packed food, approximately how many of the following types of business do you deal with on this issue? **CODE NUMBER BELOW**

- Micro businesses i.e. 20 or fewer employees
- Small businesses i.e. 20-49 employees
- Medium businesses i.e. 50-249 employees
- Large businesses i.e. 250 or more employees
- Do not know (DO NOT READ OUT)

Q4 Approximately how many Environmental Health Officers and Trading Standards Officers, including yourself, are there working for (READ OUT NAME OF LOCAL AUTHORITY) that monitor how local food manufacturers handle food allergens and food allergen labelling for **pre-packed food**? **SINGLE CODE**

- 1 – me only1
- 22
- 33
- 44
- 5-95
- 10 or more6
- Do not know7

Q5 LOCATION OF LOCAL AUTHORITY- **SINGLE CODE – Do not NEED TO ASK – CODE FROM SAMPLE**

- North East1
- North West2
- East Midlands3
- West Midlands4
- East of England5
- South East (excluding Greater London)6
- Greater London7
- South West8
- Yorks/Humber9
- Scotland10
- Wales11
- Northern Ireland12

SECTION 2 – INFORMATION SOURCES

Q6 How knowledgeable and up-to-date do you think you are on the whole issue of food allergens, cross contamination and food allergen labelling for **pre-packed** food? Would you say you are...**READ OUT - SINGLE CODE**

Q7 And how knowledgeable and up-to-date do you think the food manufacturers that you monitor are on their handling of food allergens, cross contamination and food allergen labelling for pre-packed food? Would you say they are...**READ OUT - SINGLE CODE**

Q6 Q7

Very knowledgeable and up-to-date	1
Fairly knowledgeable and up-to-date	2
Not very knowledgeable and up-to-date	3
Not at all knowledgeable and up-to-date	4
Varies by/depends on business (DO NOT READ OUT)	5

Q8 Do you think the whole issue of food allergens, cross contamination and food allergen labelling for pre-packed food is now...**READ OUT - SINGLE CODE**

Much more important than a few years ago	1
A little more important than a few years ago	2
About the same level of importance as a few years ago	3
A little less important than a few years ago	4
Much less important than a few years ago	5
Do not know (DO NOT READ OUT)	6

Q9 When thinking about organisations providing information, advice or training about food allergens and food allergens labelling, which ones come to mind? **DO NOT READ OUT - MULTICODE**

Q10 And which of the following organisations have you ever used for information, advice or training about food allergens and food allergens labelling? **READ OUT - MULTICODE – ROTATE ORDER**

Q11 And which would you say has been most useful in providing information about food allergens and allergens labelling? **READ OUT - SINGLE CODE – ROTATE ORDER**

	Q9	Q10	Q11
The Food Standards Agency1	.1	.1
Leatherhead Food International4	.4	.4
Campden and Chorleywood Food Research Association (CCFRA)	5	.5	.5
Hygiene Audit Systems6	.6	.6
The Chartered Institute for Environmental Health (CIEH)7	.7	.7
The Royal Institute for Public Health8	.8	.8
Reading Scientific Services9	.9	.9
Trading Standards Institute (TSI)10	.10	.10
The Anaphylaxis Campaign12	.12	.12
Colleges / Universities13	.13	.13
ABC Food Safety14	.14	.14
None15	.15	.15
Do not know16	.16	.16
Other (specify)17	.17	.17

SECTION 3 – THE GUIDANCE

Q13 In 2006, the Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information, which is best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. ‘may contain’ labelling). This full guidance was also accompanied by a leaflet. If you go to the following webpage: www.critical.co.uk/fsa you will be able to see what the full guidance, its contents page and the leaflet look like.

IF UNABLE TO ACCESS LINK SAY: The full guidance is a 50 page A4 booklet with an orange and white front, while the leaflet is much smaller and has a jar with an orange label on the front

Are you aware of either of these documents? **SINGLE CODE**

Yes, aware of full guidance only	1	SKIP TO Q15a
Yes, aware of leaflet only	2	SKIP TO Q15a
Yes, aware of both	3	SKIP TO Q15a
No, not aware of either	4	CONTINUE
Do not know / can't remember	5	SKIP TO Q15a

Q14 How useful do you think it would have been to have received these documents over the last 2 years? Do you think it would have been...**SINGLE CODE – IF NECESSARY RE-READ**

DESCRIPTION OF GUIDANCE FROM S4

Very useful	1	SKIP TO SECTION 4
Fairly useful	2	SKIP TO SECTION 4
Not very useful	3	SKIP TO SECTION 4
Not at all useful	4	SKIP TO SECTION 4
Do not know (DO NOT READ OUT)	5	SKIP TO SECTION 4

ASK Q15a AS APPROPRIATE FROM Q13

Q15a Do you have original hard copies of these documents? **SINGLE CODE**

Yes, have hard copy of full guidance only	1
Yes, have hard copy of leaflet only	2
Yes, have hard copies of both	3
No, Do not have hard copies of either	4
Do not know / can't remember	5

ASK Q15b AS APPROPRIATE FROM Q13

Q15b Have you ever viewed these documents online or printed them out from the Internet? **SINGLE CODE**

- Yes, full guidance only1
- Yes, leaflet only2
- Yes, both3
- No, have not viewed either4
- Do not know / can't remember5

ASK Q16 IF EVER HAD COPY OF LEAFLET (CODES 2-3 AT Q15a AND/OR Q15b), OTHERS SKIP TO Q22

Q16 Which of the following have you done with the leaflet? **READ OUT AND MULTICODE**

- Used to help develop your own knowledge/approach to the issue of food allergens and food allergens labelling1
- Handed copies out to relevant businesses in your area2
- Used it as a guide whilst discussing the issue with a business3
- Used it at training / seminars for businesses4
- Told relevant businesses in your area where to find the leaflet over the Internet5
- Other (please specify)6
- None (DO NOT READ OUT)7
- Do not know / can't remember (DO NOT READ OUT)8

Q17 Which of the following types of pre-packed food manufacturers do you think this leaflet is most appropriate for? **READ OUT AND MULTI CODE – ROTATE ORDER**

- All businesses1
- Large businesses2
- Small businesses3
- New businesses4
- Other (specify)5
- Do not know6

Q18 And how useful do you personally find this leaflet? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q19 Why do you say that? **WRITE IN**

Q20 And how useful do you think this leaflet is for food manufacturing businesses? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q21 Why do you say that? **WRITE IN**

ASK Q22 IF EVER HAD COPY OF FULL GUIDANCE (CODES 1 OR 3 AT Q13), OTHERS SKIP TO SECTION 4

Q22 When did you first become aware of the full guidance? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months1
- 4-6 months ago2
- 7-12 months ago3
- 1-1 ½ years ago4
- 1 ½ to 2 years ago5
- Do not know / can't remember (DO NOT READ OUT)6

Q23 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY - POSSIBLE MULTICODE**

- Found on FSA website1
- Via the FSA allergens labelling leaflet2
- Told/Given at training session3
- Told/Given by work colleague4
- Sent by the FSA5
- Other (specify)6
- Do not know / can't remember (DO NOT READ OUT)7

ASK Q24a IF EVER HAD COPY OF GUIDANCE (CODES 1 or 3 AT Q15a AND/OR Q15b) - OTHERS SKIP TO SECTION 4

Q24a And which of the following best describes how much of the guidance you have read? **READ OUT AND SINGLE CODE**

- | | | |
|--|---|-------------|
| Read all of it | 1 | SKIP TO Q25 |
| Read some of it | 2 | SKIP TO Q25 |
| Only skimmed through it | 3 | CONTINUE |
| Didn't read it at all | 4 | CONTINUE |
| Do not know / can't remember (DO NOT READ OUT) | 5 | SKIP TO Q25 |

Q24b Why haven't you read it at all / have you only skim read it? **WRITE IN**

Q25 Which of the following have you ever done with the guidance? **READ OUT AND MULTICODE**

- Used it to help formulate your own knowledge/approach to the issue of food allergens and food allergens labelling1
- Handed hard copies out to relevant businesses in your area 2
- Told relevant businesses in your area where to find the guidance over the Internet 3
- Used it at training / seminars for businesses 4
- Showed specific pages/sections when talking to relevant businesses 5
- Other (please specify) 6
- None (DO NOT READ OUT) 7
- Do not know / can't remember (DO NOT READ OUT) 8

Q26 Which of the following types of pre-packed food manufacturers do you think this guidance is most appropriate for? **READ OUT AND MULTI CODE – ROTATE ORDER**

- All businesses 1
- Large businesses 2
- Small businesses 3
- New businesses 4
- Other (specify) 5
- Do not know 6

Q27 And how useful did you personally find the full guidance? Would you say it was...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q28 Why do you say that? **WRITE IN**

Q29 And how useful do you think this guidance is for food manufacturing businesses? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q30 Why do you say that? **WRITE IN**

Q31 What changes, if any, did you make to the way you provide advice on the issue of food allergens and food allergen labelling as a result of reading the guidance? **WRITE IN**

Q33. Are you planning to make any changes in the future to the way you provide advice on the issue of food allergens and food allergen labelling as a result of reading the full guidance?
SINGLE CODE

- | | |
|--------------------|-------------|
| Yes1 | CONTINUE |
| No2 | SKIP TO Q35 |
| Do not know3 | SKIP TO Q35 |

Q34. What changes are you planning to make? **WRITE IN**

Q35. I'd now like you to rate some different attributes of the full guidance as very good, good, adequate, poor or very poor. So firstly, how would you rate the full guidance for: (READ OUT FIRST ATTRIBUTE)? **REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER**

	Very Poor	Poor	Adequate	Good	Very good
Being easy to read / well laid out	1	2	3	4	5
Being comprehensive	1	2	3	4	5
Providing tools or suggestions that you were able to build into the advice you provide to businesses in your area	1	2	3	4	5
Providing tools or suggestions that businesses in your area were able to implement	1	2	3	4	5
Being easy to navigate and find the sections relevant to you	1	2	3	4	5
Easy for businesses to apply to their business procedures	1	2	3	4	5
Offering practical solutions	1	2	3	4	5
Providing full authoritative guidance on food allergens and food labelling	1	2	3	4	5

Q36a What, if anything, **did you like** about the full guidance? Which sections did you find helpful?
WRITE IN

Q36b And what, if anything, **didn't you like** about the full guidance? Which sections did you not find helpful? **WRITE IN**

Q36c In order for the FSA to provide you and the businesses that you deal with, with all the relevant information you need, what improvements or changes would you suggest they make to the full guidance? **WRITE IN**

Q36d And how do you think the FSA could improve awareness and dissemination of the guidance among...

- a) People like yourself in Local Authorities? **WRITE IN**
- b) Among the businesses it is aimed at? **WRITE IN**

Q37a Over the last 2 years or so, have you received any...**READ OUT AND MULTI CODE**

- | | | |
|---|---|-------------------|
| Any direct training or advice about the guidance by attending an external training course | 1 | CONTINUE |
| Any direct training or advice about the guidance by attending an internal training course | 2 | SKIP TO Q37c |
| Feedback from colleagues who have attended courses about the guidance | 3 | SKIP TO Q37c |
| Neither (DO NOT READ OUT) | 4 | SKIP TO SECTION 4 |
| Do not know/can't remember (DO NOT READ OUT) | 5 | SKIP TO SECTION 4 |

Q37b Who has provided this training? **DO NOT READ OUT AND MULTICODE**

- A specialist training provider2
- Via the Food Standards Agency3
- Via Hygiene Audit Systems4
- The Chartered Institute for Environmental Health (CIEH)5
- Trading Standards Institute (TSI)6
- The Royal Institute for Public Health7
- Other (specify)8
- Do not know/can't remember9

Q37c And how long ago did you last receive training/feedback from your colleagues who attended a training session (ASK AS APPROPRIATE FROM Q37a) on this issue? **SINGLE CODE**

- In the last 6 months1
- 6-12 months ago2
- 2 years ago3
- Over 2 years ago4
- Do not know5

Q37d And how useful would you say this training / feedback from your colleagues was (ASK AS APPROPRIATE FROM Q37a) in helping you deal with relevant businesses in your area? Would you say it was...**READ OUT - SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q37e Why do you say that? **WRITE IN**

SECTION 4 – OTHER ISSUES

ASK ALL

Q38. Do you think in the future the guidance on allergen management should...**READ OUT – SINGLE CODE**

- Remain voluntary 'best practice'1
- Or, become compulsory legislation2
- Do not know3

Q39. And finally, would you be willing to take part in a follow-up telephone interview if we wanted to re-contact you and ask you a few more questions in a bit more depth? **SINGLE CODE**

- Yes1
- No2

Appendix 2 - Discussion Guides

Allergens Guidance Research
Manufacturing Businesses
Qualitative Discussion Guide

RECRUITMENT QUESTIONS:

- *Can I please speak to the person fully or partly responsible for the business's handling of food allergens and labelling within the business (note for interviewer: this might be someone within legislation, QA/QC or labelling)*
- *(When through) Can I just double-check that you are fully or at least partly responsible for the business's handling of food allergens within the business?*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL BUSINESS DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you approach handling food allergens and food allergen labelling within your business*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*

2. Business Background (4 minutes)

- *Before we start talking about Food Allergens can you please tell me a little bit about yourself and the business you work for, probe for:*
 - o *Type of business*
 - o *How large is the company i.e. how many people do they employ?*
 - o *Respondent job title, role and how long worked there*
 - o *Type of food manufactured*
 - o *Where is the food manufactured? Number of locations where food is manufactured? What food is manufactured at each location?*
 - o *Level of responsibility for implementation of food labelling /allergens management within business*
- *Who else is involved?*

3. Company Approach to Food Allergen Management – Controlling Cross-contamination and Food Allergen Labelling (7 minutes)

- *What is your general approach to food allergen management, particularly in terms of food labelling, risk assessment and controlling allergen cross-contamination?*

- o *Has your approach to this changed over the last few years?*
- o *In what way?*
- o *What has prompted this change?*
- *Does your business have any systems or procedures in place with regards to food labelling and particularly allergen labelling?*
- *Does your business have systems or procedures in place with regard to allergens and cross-contamination?*
- *What food allergens, if any, do you handle in your factory?*
 - o *If necessary probe for: peanuts, nuts, eggs, milk, crustaceans, molluscs, fish, sesame seeds, cereals containing gluten, Soya, lupin celery, mustard, sulphur dioxide/sulphites*
- *When these are not deliberate ingredient in a product do you use any form of advisory labelling to let customers know about possible cross-contamination?*
- *Does your company have any specific issues that make food allergen labelling complicated? For example, a food factory that makes more than one food with a risk of cross-contamination?*
 - o *How have you tackled this issue?*
- *Have you ever received advice on food allergen labelling issues?*
 - o *Who have you received advice from? Probe for: solicitors, local authority, Food Standards Agency, trade body/association, large supermarket they supply*
 - o *How useful was this advice?*

4. Awareness and Receipt of Guidance (10 minutes)

- *ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF GUIDANCE BEFORE INTERVIEW (IF Do not HAVE COPY)*
- *Read out: The Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information in 2006. It provides best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail?*
- *Before we contacted you originally, had you heard of this guidance or leaflet?*
- *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*
- *How did you become aware of it? Probe for: local authority TSOs/EHOs, retailers, trade bodies/associations, trade magazines, media, training workshops*
- *And when did you first receive/download the guidance?*
- *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
- *How would you expect to receive a document like this?*
 - o *Through which channels?*

5. Usage and Opinion of Guidance (10 minutes)

- *What have you done with the guidance since receiving/downloading it?*
 - o *How much of the guidance/leaflet have you read?*
 - o *Which sections of the guidance/leaflet, if any, have you read?*
- *Did you read the guidance in full or have you just referenced the sections you need information on?*
- *Who else within the organisation has read the guidance?*
- *What are your overall impressions of the guidance?*
 - o *What do you like about it?*
 - o *What do you dislike about it?*
 - o *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful*
 - *Well laid out*
 - o *Do you see the guidance as something that is useful or an extra burden (or somewhere in between)?*
 - o *How could it be improved? Is there anything missing?*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergen labelling?*
 - o *Why/why not?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance across the organisation?*
 - o *Why / why not?*
 - o *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance in helping you incorporate these ideas? Why do you say that?*
 - *Did you use any other documents or advice?*
 - *Which ones?*
 - *Have you encountered any barriers using the guidance and implementing the suggestions contained in it?*
 - *What barriers have you encountered?*
- *Have you made any changes as a result of the guidance to:*
 - o *The way you carry out risk assessments for your Critical Control Points?*
 - o *Your procedures e.g. cleaning procedures, scheduling, introduction of new ingredients, range of product lines*
 - *Can you give me some examples of how your procedures have changed?*
 - o *Allergen Labelling?*
 - *Can you give me some examples of how labelling has changed?*
- *And have you made any changes to labelling as a result of other issues?*
 - o *Probe for: EHOs, TSOs, pressure from customers, pressure from retailers, as a result of withdrawals/recalls etc*

- And are you **planning** to implement any of the ideas and suggestions from the guidance into the future
 - o Why / why not?
 - o If planning to implement:
 - What ideas and suggestions are you planning to use?
 - How helpful do you think the guidance will be in helping you incorporate these ideas? Why do you say that?
 - Will you use any other documents or advice?
 - Do you think you are likely to encounter any barriers using the guidance/leaflet or implementing the suggestions contained in it?
 - What barriers do you think you are likely to encounter?
 - What benefits do you think exist for the organisation if it acts upon this guidance?
 - What other support do you feel you need to help you with this issue?
 - o What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc
 - In future, do you think you be willing to pay for the full guidance booklet?
 - o If yes, how much do you think you would be willing to pay for it?
 - How much do you think you would be willing to pay for a:
 - Hard copy
 - PDF copy?
 - What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?
 - o Why do you say that?
6. And finally... (2 minutes)
- How do you feel about the messages/advice businesses get from central and local Government with regards to food allergen labelling?
 - o Does it feel joined up?
 - If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc
 - What advice or key issues would you highlight/identify to other organisations intending on using the guidance?
 - Are there any issues related to allergen management / food allergen labelling we haven't discussed that you think are important to mention to the Food Standards Agency?
 - And thinking of all the issues we've discussed what do the Food Standards Agency need to do to make it easier for you to implement allergen management procedures and food allergen labelling across your organisation?

THANK AND CLOSE

Allergens Guidance Research Enforcers Qualitative Discussion Guide

RECRUITMENT QUESTIONS:

- *Once through to local authority, explain purpose of research and ask to speak to a Trading Standards Officer or Environmental Health Officer who has responsibility for checking how local businesses handle food allergens and food allergen labelling*
- *(Once through) We're conducting research on behalf of the Food Standards Agency. Can I just double-check that you have some responsibility for checking how local businesses handle food allergens and food allergen labelling*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you monitor food allergens and food allergen labelling within food manufacturers and food retailers in your area*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*

2. Respondent Background (4 minutes)

- *Before we start talking about monitoring businesses, can you please tell me a little bit about yourself and your role, probe for:*
 - o *Respondent job title, role and how long worked at Local Authority*
 - o *How many other TSO/EHO work for this organisation?*
 - *How many are involved in monitoring how businesses handle food allergens and food allergen labelling?*
 - o *Level of responsibility for monitoring food labelling /allergens management within businesses in your area*
 - *How long have you had this remit?*
 - o *What training, if any, have you received in the area of food allergens and food allergen labelling in the last few years?*
 - *Probe for: Food Standards Agency, 3rd party training body, by someone else within the local authority*
 - o *And what other information or advice have you received in that time to help you in this area?*
 - *Written guides, online support etc.*

3. **Local Authority Approach to Monitoring Food Allergen Management – Controlling Cross-contamination and Food Allergen Labelling (7 minutes)**
- *What is your general approach to monitoring businesses in your area for food allergen management, particularly in terms of food labelling, risk assessment and allergen cross-contamination?*
 - *Has your approach to this changed over the last few years?*
 - *In what way?*
 - *What has prompted this change?*
 - *Approximately how many businesses in your area require monitoring for food allergen management and food labelling?*
 - *How many of these do you personally monitor?*
 - *How does that breakdown between:*
 - *Large food manufacturers*
 - *Small-medium food manufacturers*
 - *Large retailers*
 - *How do you monitor food labelling and particularly allergen labelling in the businesses you visit?*
 - *And how do you monitor allergens and cross-contamination in those businesses?*
 - *Do you have to monitor any businesses which have any specific issues that make food allergen labelling complicated? For example, a food factory that makes more than one food with a risk of cross-contamination?*
 - *How have you tackled this issue?*
4. **Awareness and Receipt of Guidance (10 minutes)**
- ***ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF GUIDANCE BEFORE INTERVIEW (IF Do not HAVE COPY)***
 - ***Read out: The Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information in 2006. It provides best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail?***
 - *Before we contacted you originally, had you heard of this guidance or leaflet?*
 - *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*
 - *How did you become aware of it? Probe for: local authority, other TSOs/EHOs, retailers, trade bodies/associations, trade magazines, media, training workshops*
 - *And when did you first receive/download the guidance?*
 - *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
 - *Would you expect to have a copy of the guidance/leaflet for reference purposes?*
 - *How would you expect to receive a document like this?*
 - *Through which channel/s?*

5. Usage and Opinion of Guidance (10 minutes)

- *Have you or your local authority tried to make businesses aware of this guidance since it has been published?*
- *Have you distributed any hard copies to businesses in your area?*
 - *How have you done this? Probe for: post, at seminars/conferences, on site visits, sent weblink via email/letter?*
- *What else have you done with the guidance since receiving/downloading it?*
 - *How much of the guidance/leaflet have you personally read?*
 - *Which sections of the guidance/leaflet, if any, have you read?*
 - *Have you used any of the information when sending information out to relevant businesses in the area?*
- *Did you read the guidance in full or have you just referenced the sections you need information on?*
- *Who else within the local authority has read the guidance?*
- *What are your overall impressions of the guidance?*
 - *What do you like about it?*
 - *What do you dislike about it?*
 - *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful for you*
 - *Useful for businesses in the area*
 - *Well laid out*
 - *Do you see the guidance as something that is useful or an extra burden for businesses (or somewhere in between)?*
 - *How could it be improved? Is there anything missing?*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergen labelling?*
 - *Why/why not?*
- *And to what extent do you think businesses have incorporated the ideas and suggestions outlined in this guidance?*
 - *Why / why not?*
 - *If implemented:*
 - *What ideas and suggestions have they used?*
 - *How helpful was the guidance in helping them incorporate these ideas? Why do you say that?*
 - *Did they use any other documents or advice?*
 - *Which ones?*
 - *Do you know if they encountered any barriers using the guidance and implementing the suggestions contained in it?*
 - *What barriers did they encounter?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance in to your role and the way you monitor businesses?*

- o *Why / why not?*
 - o *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance in helping you in your role? Why do you say that?*
 - *Do you use any other documents or advice?*
 - *Which ones?*
 - *Have you made any changes to the way you operate and monitor businesses as a result of the guidance, particularly in the way businesses:*
 - o *Carry out risk assessments for their Critical Control Points?*
 - o *Their procedures e.g. cleaning procedures, scheduling, introduction of new ingredients, range of product lines*
 - o *Allergen Labelling?*
 - *What benefits do you think exist for the organisations in your area if they act upon this guidance?*
 - *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*
 - *In future, do you think you would be willing to pay for the full guidance booklet?*
 - o *If yes, how much do you think you would be willing to pay for it?*
 - *How much do you think you would be willing to pay for a:*
 - *Hard copy*
 - *PDF copy?*
 - *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*
 - o *Why do you say that?*
- 6. And finally... (2 minutes)**
- *How do you feel about the messages/advice businesses get from central and local Government with regards to food allergen labelling?*
 - o *Does it feel joined up?*
 - *If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc*
 - *What advice or key issues would you highlight/identify to other TSOs/EHOs intending on using the guidance?*
 - *Are there any issues related to allergen management / food allergen labelling we haven't discussed that you think are important to mention to the Food Standards Agency?*
 - *And thinking of all the issues we've discussed what do the Food Standards Agency need to do to make it easier for businesses manage their allergen management procedures and food allergen labelling across your organisation?*
 - *And what could they do to make your role easier?*

THANK AND CLOSE

Allergens Guidance Research
Large retailers
Qualitative Discussion Guide

RECRUITMENT QUESTIONS:

- *Can I please speak to the person fully or partly responsible for the business's handling of food allergens and labelling within the business (note for interviewer: this might be someone within legislation, QA/QC or labelling)*
- *(When through) Can I just double-check that you are fully or at least partly responsible for the business's handling of food allergens within the business?*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL BUSINESS DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you approach handling food allergens and food allergen labelling within your business*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*

2. Business Background (4 minutes)

- *Before we start talking about Food Allergens can you please tell me a little bit about yourself and the business you work for, probe for:*
 - o *Type of business*
 - o *How large is the company i.e. how many people do they employ?*
 - o *Respondent job title, role and how long worked there*
 - o *Type of food manufactured:*
 - *Do you manufacture foods yourself?*
 - *Do other people manufacture your 'own brand' products?*
 - *Do you sell only 'branded' goods?*
 - o *Where is the retailer's food manufactured? Number of locations where food is manufactured? What food is manufactured at each location?*
 - o *Level of responsibility for implementation of food labelling /allergens management within business*
 - *Who else is involved?*

3. **Company Approach to Food Allergen Management – Controlling Cross-contamination and Food Allergen Labelling (7 minutes)**

- *What is your general approach to food allergen management when manufacturing your own food products, particularly in terms of food labelling, risk assessment and controlling allergen cross-contamination?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *And what is your general approach to food allergen management for food manufacturers that supply your business with products, particularly in terms of food labelling, risk assessment and controlling allergen cross-contamination?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *Does your business have any systems or procedures in place with regards to food labelling and particularly allergen labelling?*
- *Does your business have systems or procedures in place with regard to allergens and cross-contamination?*
- *What food allergens, if any, do you handle in your factory?*
 - o *If necessary probe for: peanuts, nuts, eggs, milk, crustaceans, molluscs, fish, sesame seeds, cereals containing gluten, Soya, lupin celery, mustard, sulphur dioxide/sulphites*
- *When these are not deliberate ingredient in a product do you use any form of advisory labelling to let customers know about possible cross-contamination?*
- *Does your company have any specific issues that make food allergen labelling complicated? For example, a food factory that makes more than one food with a risk of cross-contamination?*
 - o *How have you tackled this issue?*
- *Have you ever received advice on food allergen labelling issues?*
 - o *Who have you received advice from? Probe for: solicitors, local authority, Food Standards Agency, trade body/association, suppliers/producers making your 'own brand' products*
 - o *How useful was this advice?*

4. **Awareness and Receipt of Guidance (10 minutes)**

- **ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF GUIDANCE BEFORE INTERVIEW (IF Do not HAVE COPY)**
- **Read out: The Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information in 2006. It provides best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail?**
- *Before we contacted you originally, had you heard of this guidance or leaflet?*
- *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*

- *How did you become aware of it? Probe for: local authority TSOs/EHOs, retailers, trade bodies/associations, trade magazines, media, training workshops*
- *And when did you first receive/download the guidance?*
- *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
- *How would you expect to receive a document like this?*
 - *Through which channel/s?*

5. Usage and Opinion of Guidance (10 minutes)

- *What have you done with the guidance since receiving/downloading it?*
 - *How much of the guidance/leaflet have you read?*
 - *Which sections of the guidance/leaflet, if any, have you read?*
- *Did you read the guidance in full or have you just referenced the sections you need information on?*
- *Who else within the organisation has read the guidance?*
- *What are your overall impressions of the guidance?*
 - *What do you like about it?*
 - *What do you dislike about it?*
 - *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful*
 - *Well laid out*
 - *Do you see the guidance as something that is useful or an extra burden (or somewhere in between)?*
 - *How could it be improved? Is there anything missing?*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergen labelling?*
 - *Why/why not?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance across the organisation?*
 - *Why / why not?*
 - *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance in helping you incorporate these ideas? Why do you say that?*
 - *Did you use any other documents or advice?*
 - *Which ones?*
 - *Have you encountered any barriers using the guidance and implementing the suggestions contained in it?*
 - *What barriers have you encountered?*
- *Do you suggest that the food manufacturers that you deal with follow this guidance or do you issue them with your own guidance?*
- *Have you made any changes as a result of the guidance to: (a) internal procedures, and (b) your dealings with food manufacturers that you deal with*
 - *The way you carry out risk assessments for your Critical Control Points?*
 - *Your procedures e.g. cleaning procedures, scheduling, introduction of new ingredients, range of product lines?*

- *Can you give me some examples of how your procedures have changed?*
 - o *Allergen Labelling?*
 - *Can you give me some examples of how labelling has changed?*
 - *And have you made any changes to labelling as a result of other issues?*
 - o *Probe for: EHOs, TSOs, pressure from customers, pressure from retailers, as a result of withdrawals/recalls etc.*
 - *And are you planning to implement any of the ideas and suggestions from the guidance into the organisation in the future?*
 - o *Why / why not?*
 - o *If planning to implement:*
 - *What ideas and suggestions are you planning to use?*
 - *How helpful do you think the guidance will be in helping you incorporate these ideas? Why do you say that?*
 - *Will you use any other documents or advice?*
 - *Do you think you are likely to encounter any barriers using the guidance/leaflet or implementing the suggestions contained in it?*
 - *What barriers do you think you are likely to encounter?*
 - *What benefits do you think exist for the organisation if it acts upon this guidance?*
 - *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*
 - *In future, do you think you would be willing to pay for the full guidance booklet?*
 - o *If yes, how much do you think you would be willing to pay for it?*
 - *How much do you think you would be willing to pay for a:*
 - *Hard copy?*
 - *PDF copy?*
 - *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*
 - o *Why do you say that?*
- 6. And finally... (2 minutes)**
- *How do you feel about the messages/advice you get from Government with regards to food allergen labelling?*
 - o *Does it feel joined up?*
 - *If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc*
 - *What advice or key issues would you highlight/identify to other organisations intending on using the guidance?*
 - *Are there any issues related to allergen management / food allergen labelling we haven't discussed that you think are important to mention to the Food Standards Agency?*
 - *And thinking of all the issues we've discussed what do the Food Standards Agency need to do to make it easier for you to implement allergen management procedures and food allergen labelling across your organisation?*

THANK AND CLOSE

Allergens Guidance Research Training Bodies Qualitative Discussion Guide

RECRUITMENT QUESTIONS:

- *Can I speak to someone responsible for training businesses in the area of food safety management.*
- *(Once through) We're conducting research on behalf of the Food Standards Agency, and we'd like to talk to people who train businesses about food safety management. In particular we want to talk to people who cover the issue of food allergens and labelling within businesses. Is this something you ever cover in your training sessions?*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL BUSINESS DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you train businesses about handling food allergens and food allergen labelling*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*

2. Business Background (4 minutes)

- Before we start talking about training businesses, can you please tell me a little bit about yourself and your role, probe for:
 - Respondent job title, role and how long worked at training body
 - How many other trainers work for this organisation?
- How many are involved in training businesses about food allergens and food allergen labelling?
 - What types of businesses do you train on this type of issue? Probe for: small/medium food manufacturers, large food manufacturers and large retailers
- Do you mainly train businesses in one area or do you cover other regions?
 - Do you train anybody else in this subject area such as local authorities?

3. Approach to Training Businesses about Food Allergen Management – Controlling Cross-contamination and Food Allergen Labelling (7 minutes)

- What is your general approach to training businesses about food allergen management, particularly in terms of food labelling, risk assessment and allergen cross-contamination?
 - Has your approach to this changed over the last few years?
 - In what way?
 - What has prompted this change?
- What other areas do you cover in your training programme?
 - What proportion of training sessions relate specifically to food allergens and food allergen labelling?

- o Has the proportion this accounts for increased, decreased or remained about the same over the last few years? Why do you say that?
 - Do you have to train/help businesses which have any specific issues that make food allergen labelling complicated? For example, a food factory that makes more than one food with a risk of cross-contamination?
 - o How have you tackled this issue?
4. Awareness and Receipt of Guidance (10 minutes)
- **ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF GUIDANCE BEFORE INTERVIEW (IF DO NOT HAVE COPY)**
 - *Read out: The Food Standards Agency published voluntary Guidance on Allergen Management and Consumer Information in 2006. It provides best practice guidance on controlling food allergens in the factory setting with particular reference to avoiding cross-contamination and using appropriate advisory labelling (e.g. 'may contain' labelling). The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail?*
 - *Before we contacted you originally, had you heard of this guidance or leaflet?*
 - *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*
 - *How did you become aware of it? Probe for: via Food Standards Agency, , TSOs/EHOs, professional bodies (CIEH, TSI etc), media*
 - *And when did you first receive/download the guidance?*
 - *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
 - *Would you expect to have a copy of the guidance/leaflet for reference purposes?*
 - *How would you expect to receive a document like this?*
 - o *Through which channels?*
5. Usage and Opinion of Guidance (10 minutes)
- *Have you or your organisation tried to make businesses aware of this guidance since it has been published?*
 - *Have you distributed any hard copies to businesses that have been involved in your training?*
 - o *How have you done this? Probe for: post, at training sessions, sent weblink via email/letter?*
 - *What else have you done with the guidance since receiving/downloading it?*
 - o *How much of the guidance/leaflet have you personally read?*
 - o *Which sections of the guidance/leaflet, if any, have you read?*
 - o *Have you used any of the information as part of your training programme?*
 - *Which sections have used most frequently? Why?*
 - *Which sections have you also used? Why?*
 - *Which sections haven't you used at all? Why?*
 - *Did you read the guidance in full or have you just referenced the sections you need information on?*
 - *Who else within your organisation has read the guidance?*

- *What are your overall impressions of the guidance?*
 - *What do you like about it?*
 - *What do you dislike about it?*
 - *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful for you*
 - *Useful for businesses that you train*
 - *Well laid out*
 - *Do you see the guidance as something that is useful or an extra burden for businesses (or somewhere in between)?*
 - *How could it be improved? Is there anything missing?*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergen o Why/why not?*
- *And to what extent do you think businesses have incorporated the ideas and suggestions outlined in this guidance?*
 - *Why / why not?*
 - *If implemented:*
 - *What ideas and suggestions have they used?*
 - *How helpful was the guidance in helping them incorporate these ideas? Why do you say that?*
 - *Did they use any other documents or advice?*
 - *Which ones?*
 - *Do you know if they encountered any barriers using the guidance and implementing the suggestions contained in it?*
 - *What barriers did they encounter?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance in to your role and the way you train businesses?*
 - *Why / why not?*
 - *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance in helping you in your role? Why do you say that?*
 - *Do you use any other documents or advice?*
 - *Which ones?*
- *Have you made any changes to the way you train and advise businesses as a result of the guidance, particularly in the way businesses:*
 - *Carry out risk assessments for their Critical Control Points?*
 - *Their procedures e.g. cleaning procedures, scheduling, introduction of new ingredients, range of product lines*
 - *Allergen Labelling?*
- *What benefits do you think exist for the organisations in your area if they act upon this guidance?*

- *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*
 - *In future, do you think you would be willing to pay for the full guidance booklet?*
 - o *If yes, how much do you think you would be willing to pay for it?*
 - *How much do you think you would be willing to pay for a:*
 - *Hard copy*
 - *PDF copy?*
 - *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*
 - o *Why do you say that?*
6. **And finally... (2 minutes)**
- *How do you feel about the messages/advice businesses get from Government with regards to food allergen labelling?*
 - o *Does it feel joined up?*
 - *If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc*
 - *What advice or key issues would you highlight/identify to other training bodies intending to use the guidance?*
 - *Are there any issues related to allergen management / food allergen labelling we haven't discussed that you think are important to mention to the Food Standards Agency?*
 - *And thinking of all the issues we've discussed what do the Food Standards Agency need to do to make it easier for businesses manage their allergen management procedures and food allergen labelling across your organisation?*
 - *And what could they do to make your role easier?*

THANK AND CLOSE

Appendix 3 – Weights applied during quantitative analysis

Businesses from Scotland, Wales and Northern Ireland were over-represented during the quantitative stage so that we could analyse the results by each of the four countries. Weights were then applied to the quantitative findings to ensure the total data was representative by country.

The following weights were applied to the quantitative results:

Food Manufacturers:

Country	Unweighted base size	Weighted base size
England	104	219
Scotland	50	26
Wales	51	12
Northern Ireland	50	9
Total sample size	255	266

Enforcers:

Country	Unweighted base size	Weighted base size
England	70	65
Scotland	10	14
Wales	10	10
Northern Ireland	10	11
Total sample size	100	100

